



**PERMIT STREAMLINING  
TASK FORCE  
SUBCOMMITTEE  
MEETING  
June 15, 2023**

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**Permit Streamlining Task  
Force Subcommittee**

June 15, 2023

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## Agenda



Application  
Inventory  
Update



Strategic  
Initiatives



Online Filing  
Update



Source Test  
Tracking Portal



Other Business  
and Public  
Comment

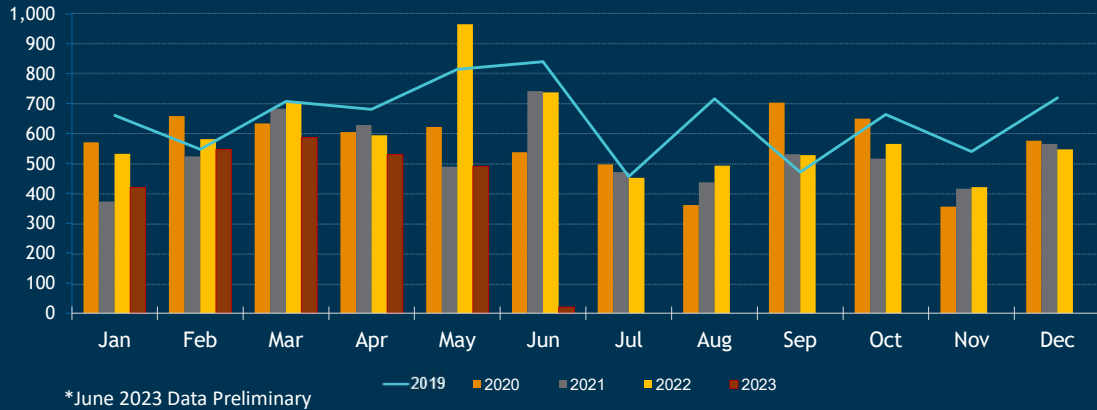
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## Application Inventory Update

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# Permit Application Activity

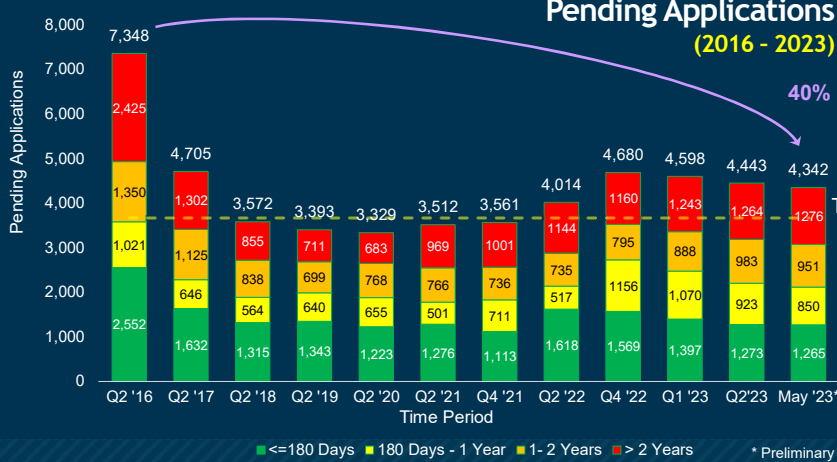
## Number of Applications Received per Month



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# Pending Application Inventory

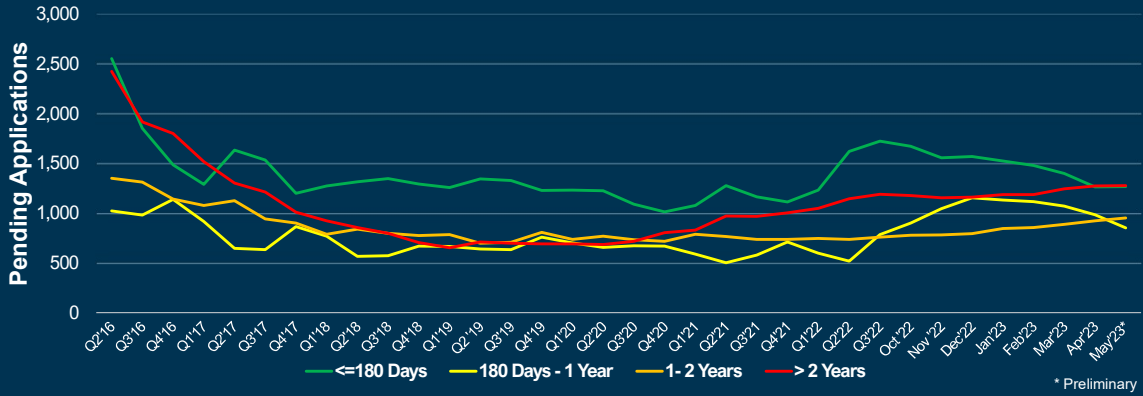
## Pending Applications (2016 - 2023)



- Inventory increase halted
- Peak Inventory 4,721 (1/31/23)
- Key promotions late 2022
- 2022 - 11% more applications submitted compared to 2021
- More complexity; new rules
- Workplan for aged applications being developed through Chair's Permitting Enhancement Program (PEP)

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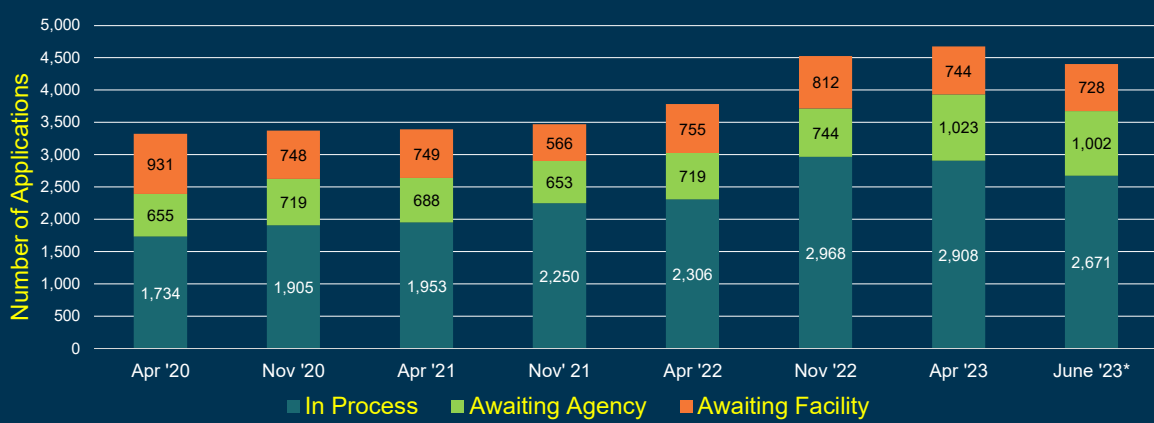
## Total Pending Applications (2016-2023)



\* Preliminary

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## Dashboard Pending Action Trends



\*June 6, 2023

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## Pending Permit Application Status Dashboard

April 2023 Snapshot

Completeness Determ. (Facility Action)		In Process		Awaiting Facility Action		Awaiting South Coast AQMD Action	
<b>Add'l Info. Req.</b>	<b>7%</b>	Engineering Evaluation and Administrative Processing	62%	Compliance Review Draft	1%	<b>Supv/Mgr Review</b>	<b>14%</b>
Related App A/I	1%			Conduct Source Test Awaiting Constr.	3%	Related App Proc.	3%
						Other Agency Rev.	2%
						<b>Source Test Review</b>	<b>1%</b>
						Policy Review	1%
						Field Eval	< 1%
						Public Notice	< 1%

Data to be utilized to identify opportunities for permitting enhancements

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## Pending Permit Application Status Dashboard

April 2023 Snapshot - Aged Apps (> 2 years)

Completeness Determ. (Facility Action)		In Process		Awaiting Facility Action		Awaiting South Coast AQMD Action	
<b>Add'l Info. Req.</b>	<b>10%</b>	Engineering Evaluation and Administrative Processing	50%	Compliance Review Draft	2%	<b>Supv/Mgr Review</b>	<b>13%</b>
Related App A/I	1%			Conduct Source Test Awaiting Constr.	2%	Related App Proc.	6%
						Other Agency Rev.	1%
						<b>Source Test Review</b>	<b>3%</b>
						Policy Review	1%
						Field Eval	< 1%
						Public Notice	< 1%

Higher portion of aged applications are awaiting facility action

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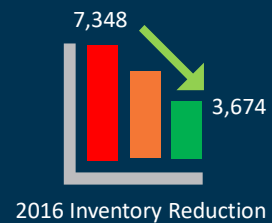
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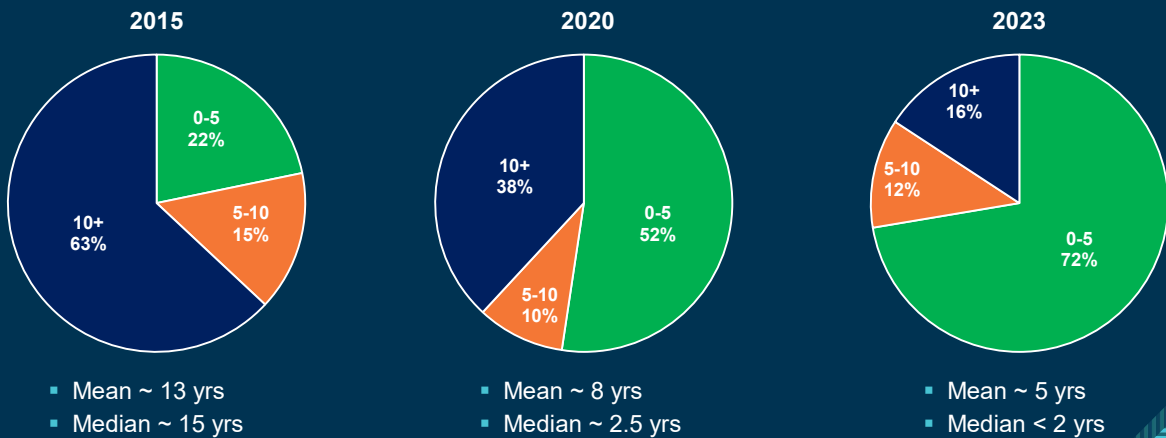
## Permitting Enhancement Project (PEP)

- Chair announced priority initiative to enhance permitting system (April 2023)
  - Staffing and workload challenges resulting in increased application inventory
  - Initiative to modernize permitting process and improve issuance timelines
  - Staff will present a comprehensive workplan at August 2023 Board meeting
- Average of 500-600 applications received monthly
- Previous effort - 2016 Action Plan to address:
  - Growing inventory of pending applications
  - Issuing permits in a timely manner
  - Increasing transparency
  - 2016 Goal: cut pending application inventory by 50% (3,674)
  - Current pending application inventory: 4,340

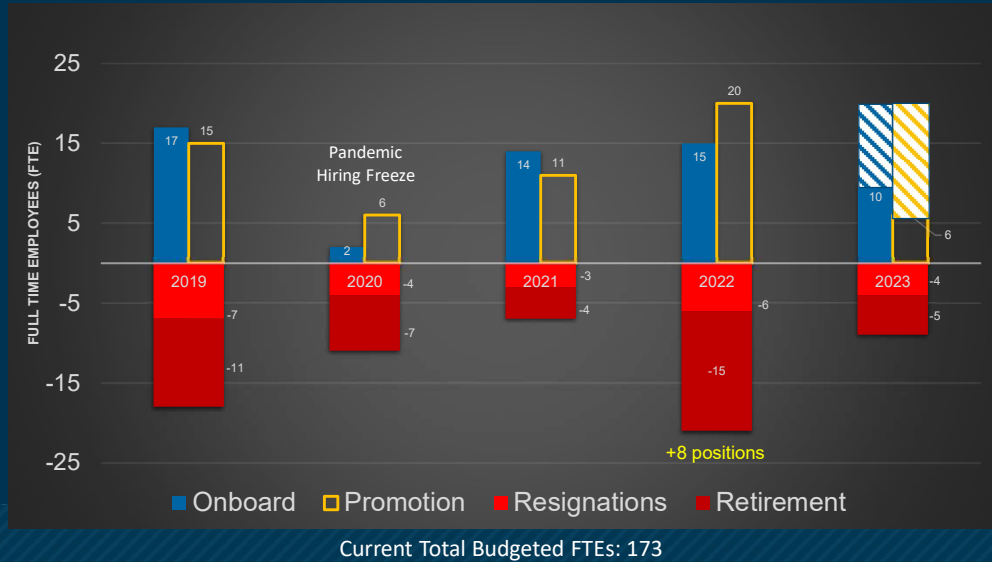


2016 Inventory Reduction

## E&P Staffing Turnover and Attrition Years Experience in Role - Processing Engineers



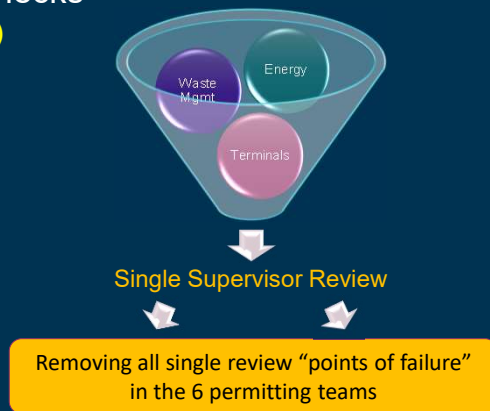
## E&P Staffing Recent Efforts



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## Workflows Analysis and Adjustments in 2022

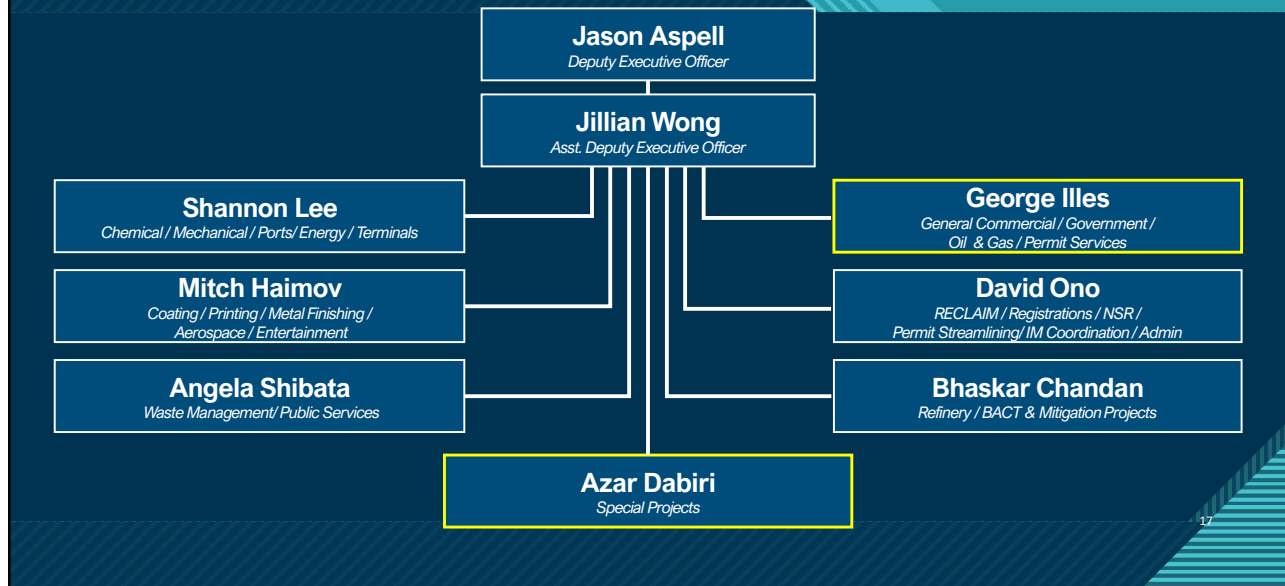
- 2022 Dashboard analysis identified bottlenecks
  - Supervisory review stage (primary bottleneck)
  - Additional supervisory positions added
  - 8 additional positions in Q4 2022
    - Mid-year budget
    - December 2022 promotions
    - Staff retention challenges
  - Debottlenecking review
- Source Test Reviews
  - Prioritized aged source test reviews
- Redistribution of workloads



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# Updated Organizational Chart



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# Process Streamlining

## Review of recent efforts

### Streamlining of internal process

- Preparation of Guidance documents
- Analyzing implementation requirements during rule development to remove obstacles and delays that may be encountered during permit processing
- Create consistency - facility requests to change standard conditions take more time to approve
- Streamlining is not removing requirements or lessening enforceability of permit

CEQA Findings Implementation Document	Rule 461.1 Implementation Document	E85 Screening Tables	Staff Training Emissions Modeling	Tier 4 Emer. ICE Source Test Guidance
<ul style="list-style-type: none"> <li>• Developed criteria for when CEQA review is triggered</li> <li>• Developed template for Responsible Agency Findings in response to recent case law</li> </ul>	<ul style="list-style-type: none"> <li>• Developed new various locations and site-specific location permits for mobile fuelers</li> <li>• Screening tables for throughputs</li> <li>• Standardized approach</li> </ul>	<ul style="list-style-type: none"> <li>• Large incoming workload of E85 gas stations</li> <li>• Allows simplified references for emission factors for permitting</li> <li>• Developed screening tables for throughput</li> </ul>	<ul style="list-style-type: none"> <li>• Requirement under New Source Review</li> <li>• Reduced need for external resources</li> <li>• Increased operational efficiencies</li> </ul>	<ul style="list-style-type: none"> <li>• Streamlined and simplified source test requirements</li> <li>• Reduces operations needed for testing</li> <li>• Template for permit conditions</li> <li>• In progress</li> </ul>

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## E&P Goals

- Current goal structure to reduce inventory has resulted in focus on quick completions
  - Does not account for volume of incoming applications
  - Includes applications not awaiting District action
  - All applications, regardless of complexity and regulatory timelines, are weighted the same
  - 70% of applications are completed within 180 days
    - Approx. 90% of non-Title V applications are completed within 180 days
  - Complex applications may become aged
    - Long term projects, changing engineer assignments
    - CEQA
    - Regulatory and engineering challenges
      - Lower emission limits – additional monitoring provisions
      - Monitoring of capture and control efficiencies
      - Rigorous rule requirements
- New goals reflective of current challenges and resources are under development



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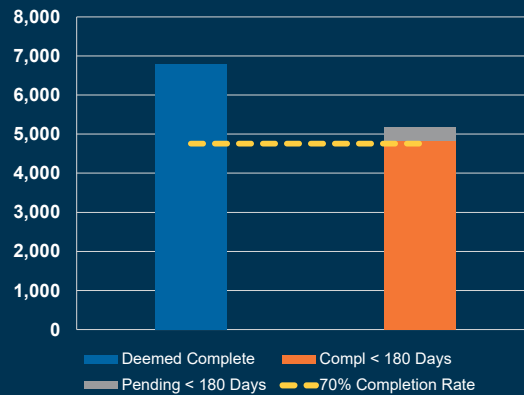
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## E&P Goals - FY2023/2024

### Timely Completion Goal

- Maintain current completion rate of 70% within 180 days
- For applications received in calendar year 2022, on target to exceed rate
- Reviewing application subcategories for complexity and timelines

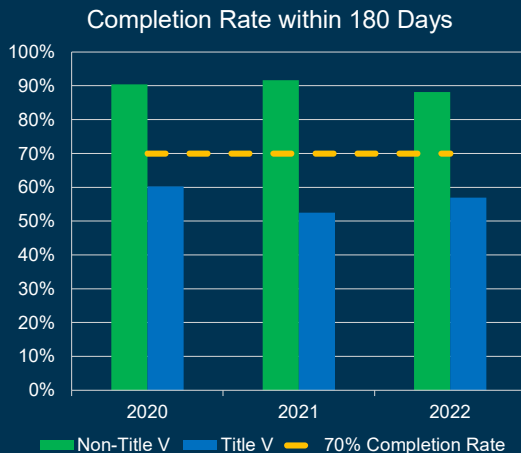
Total Applications  
(Received Calendar Year 2022)



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## E&P Goals - Considerations for PEP



### Title V Applications

- Title V applications are more complex with additional review milestones from EPA and public comment
- Regulation XXX – Title V Permits allows additional time for processing
- Title V applications include subcategories for de minimis, administrative and significant amendments
- Initial Title V, significant, and renewal applications have longer (18 month) lead times
- US EPA requires enhanced statement of basis for new approvals

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## E&P Goals - Considerations for PEP (cont'd)

- Timelines and metrics for Title V applications may be appropriate for specific teams
- Review other subcategories to identify efficiency opportunities and to estimate processing times
  - Leverage dashboard to track cumulative time for various tasks
  - Segregate applications based on equipment type, regulatory program, industry, federal or state regulatory applicability
  - Revisit E&P team workloads with respect to processing time expectations
  - Align E&P staffing efforts with permit application inventory composition
- Ideal goals and metrics would consider both regulatory timelines and stakeholder expectations

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## Other PEP Considerations - Pre-application Meetings

- Encourage pre-application meetings for Title V facilities and complex projects
- Allows staff to get better understanding of project
- Allows applicants to communicate timelines
- Identify the information needed in the permit application
  - CEQA status
- Avoids multiple information requests prior to deeming application complete

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## Other PEP Considerations Permit Public Noticing

- Have experienced recent issues with Public Noticing
- Delays in permit issuance due to:
  - Facilities not sending out Public Notices in a timely manner
  - Missing addresses which necessitates re-starting public review period
- Facilities add in their own flyer to the mailing which creates confusion within communities
- New Public Noticing team to streamline this function
  - Lessen burden on processing engineers to track noticing efforts

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## Membership Input

Staff is seeking input from Permit Streamlining Task Force members on development of potential PEP measures

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## Comments

Strategic Initiatives

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# Online Filing Update

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## Online Modules

### Rule 222 Registrations

- 222-A, Negative Air Machines (Asbestos)
- 222-B, Boilers (1-2 mmBtu/hr)
- 222-C, Commercial Charbroilers
- 222-CT, Cooling Towers
- 222-TP, Tar Pots
- 222-PW, Pressure Washers
- 222-FO, Food Oven
- 222-OS, Storage of Odorants
- 222-U, Equipment Used to Store Aqueous Urea Solutions
- 222-AT, Asphalt Day Tanker

### Rule 222 Registrations (cont.)

- 222-AH, Asphalt Pavement Heater
- 222-DB, Diesel Fueled Boiler
- 222-MT, Micro-Turbines
- 222-PH, Portable Diesel Fueled Heater

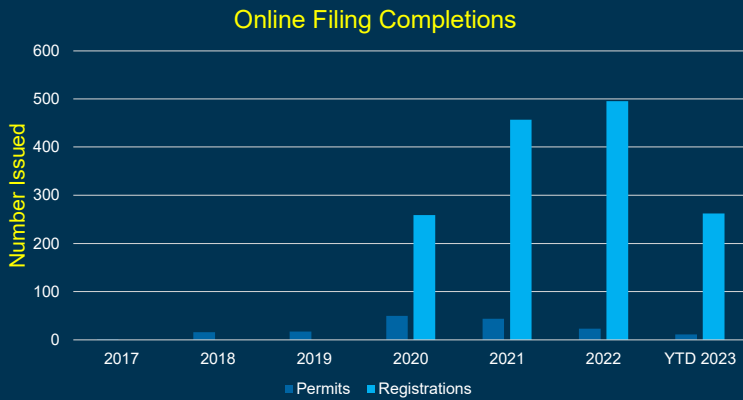
### Permit to Operate

- Dry Cleaners
- Automotive Repair Facility Spray Booths
- Certified Emergency Engines  
[Registration Permit](#)
- Gasoline Dispensing Facilities  
(offline)

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## Online Filing Activity



### Q2 Update

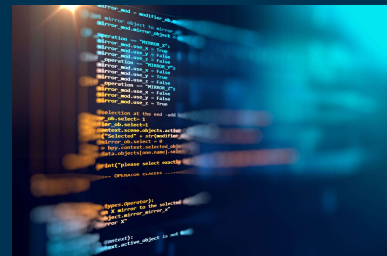
- Registered Emergency Engine Permit module is live
- One issued online, two in-house
- Recommend contacting E&P for first time users

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## Development

- Remaining R222 Forms
  - Remainder of Rule 222 items are infrequently used
  - Continue to have paper option
- Dashboard Enhancement
  - Support PEP efforts
  - Incorporate historical reporting for analysis of trends
  - Allow for additional categories based on stakeholder input
- Clean Air Support System (CLASS) Migration Project
  - CLASS is the software used for permit processing
  - Platform modernization
  - Multi-year, multi-divisional effort



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