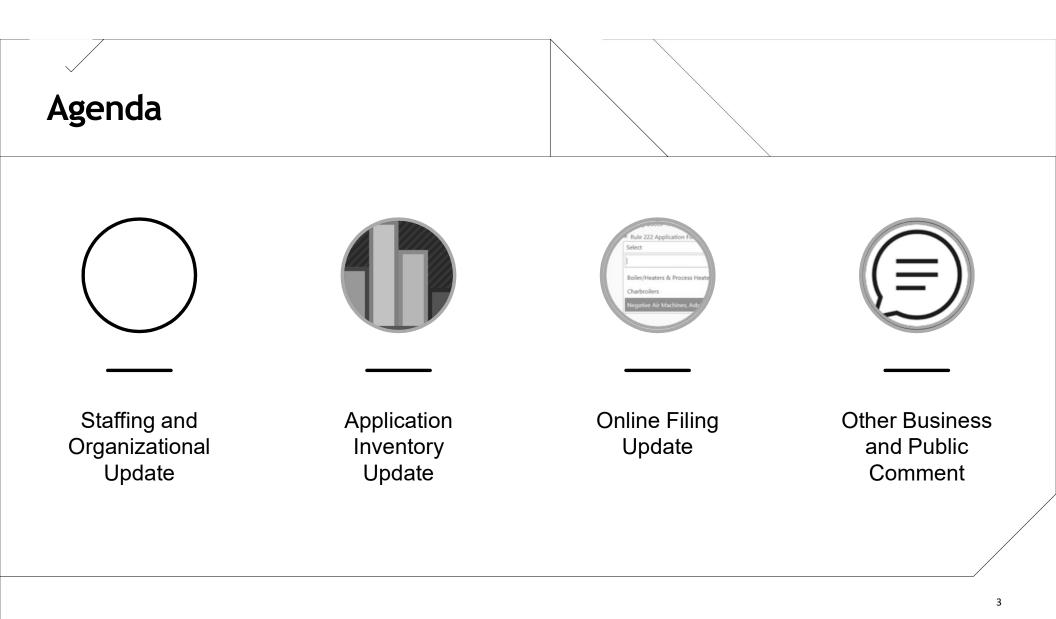


## PERMIT STREAMLINING TASK FORCE SUBCOMMITTEE MEETING December 14, 2022

## Permit Streamlining Task Force Subcommittee

December 14, 2022



# Staffing and Organizational Update

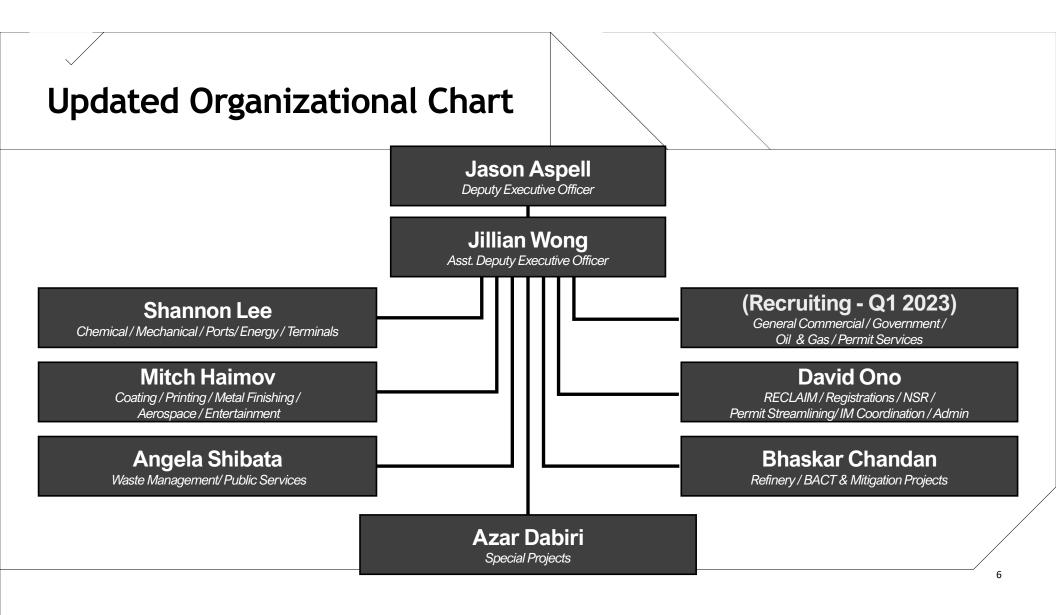
#### **Resource Update**

#### 2022 Recruitment

- Recruited 14 new Air Quality Engineers (AQE) (onboarding Q 2/3 2022)
- AQE recruitment initiated (onboarding Q4 2022)
- 5 promotions; 13 retirements; 4 separations
- Continuing assessment of staffing needs
- 2 supervisor positions approved in latest budget

#### Staffing Update

- 12 new Air Quality Engineers (onboarded Q3)
- Anticipate onboarding more AQEs in Q1 2023
- 11 promotions
- Mid-year additions 8 positions
- Current promotional efforts



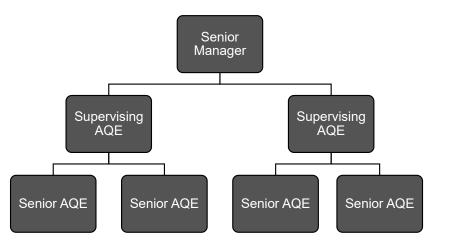
#### Reorganization

- Analysis of workflow and review backlogs
  - Rebalancing of workloads
  - Strategic staff additions based on dashboard data
- Coatings
  - Additional line and supervisory staff
- Waste Management
  - Redistributed workload
  - Additional supervisory staff
- Refinery Team
  - Additional supervisory staff



#### **Reorganization Strategy**

- 3 permitting teams changing structure
  - 2 Supervising AQEs 4 Senior AQEs
  - Allows for operational flexibility within teams
- New Special Projects team
- Succession planning
- Filling of new vacancies in progress
- Reorganization was effective November 28, 2022



#### **New - Special Projects Team**

- Focus on reducing permit application inventory
  - Aged permit applications
  - Title V renewals
  - Provide processing and review support
  - Manage workloads of retirees and contractors



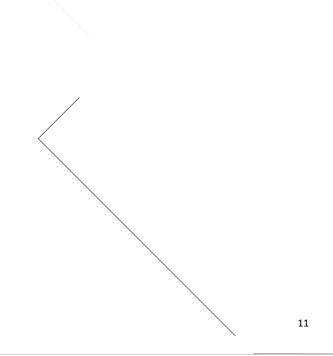
#### COVID-19 Impact Update

- October 2022 Implemented new teleworking policy
- Extended teleworking
  - Committed to operational goals
  - Office presence
- Hybrid meetings
- CPP Conducted November 17, 2022 (regular schedule June 2023)



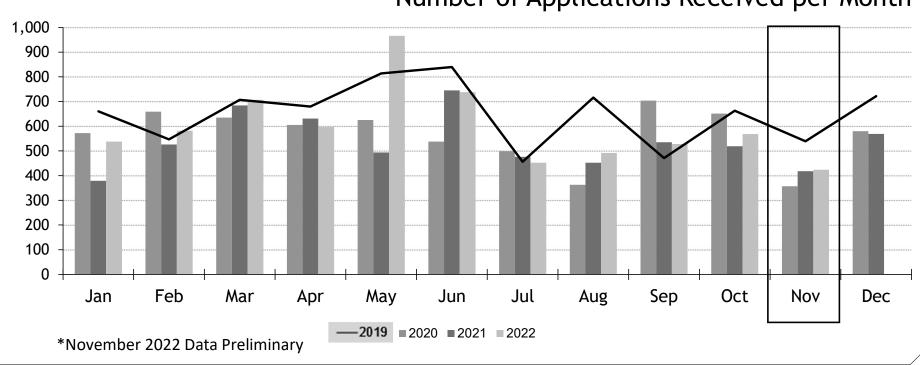
## Comments

Staffing and Organizational Update



# Application Inventory Update

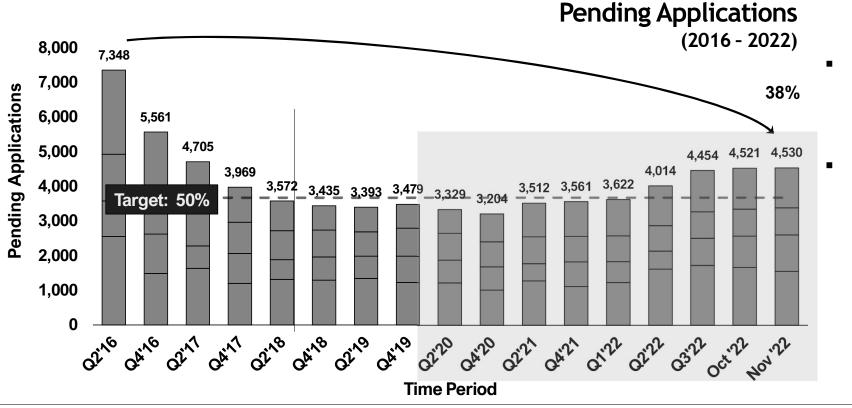
#### **Permit Application Activity**



#### Number of Applications Received per Month

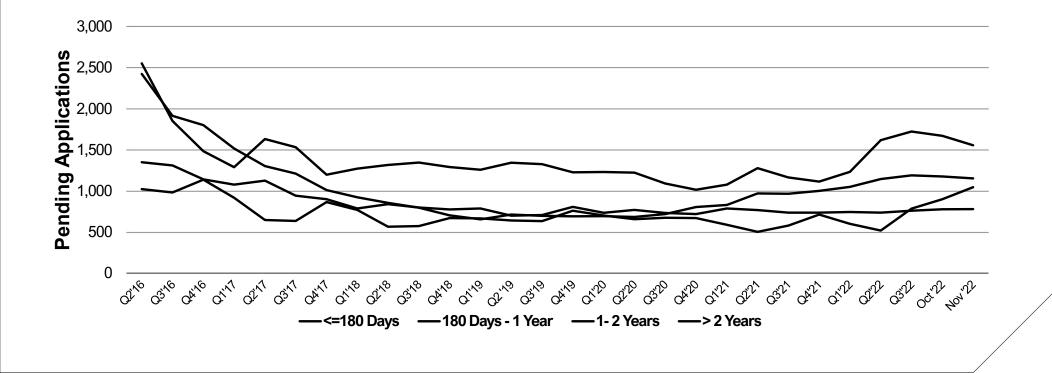
13

#### Permit Processing 2016 Inventory Reduction Initiative



- Pandemic trends and staff turnover continue to present challenges
- Observed significant increase in incoming applications signaling transition out of pandemic

#### Total Pending Applications (2016-2022)



#### Rule 1109.1 - Current Implementation Status

- First report Stationary Source Committee (SSC) October 21, 2022
- Quarterly updates
  - Next update SSC February 2023
- 72 applications received, Year-to-date
- Nearing completion of plan applications
  - Next step U.S. EPA review

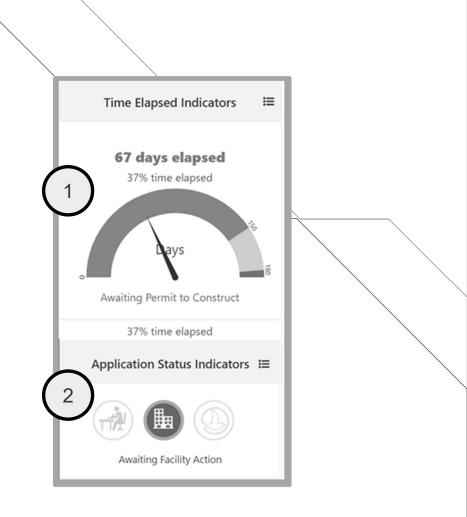


## Pending Permit Application Status Dashboard Update

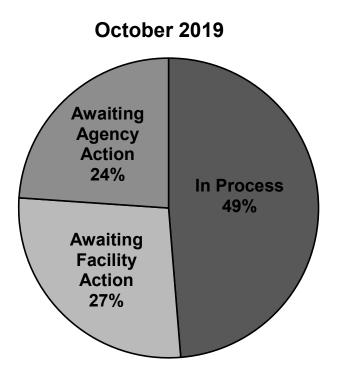
17

#### **Dashboard Status Indicators**

- Two status indicator types:
  - 1. Time elapsed indicator
  - 2. Application status indicators
- Application status indicators:
  - 1. In process
  - 2. Awaiting agency action
  - 3. Awaiting facility action

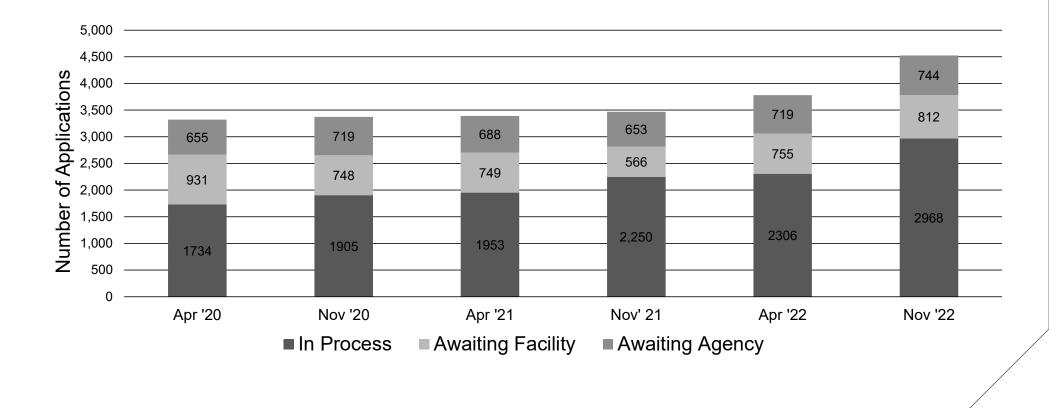


#### Pending Permit Application Status Dashboard Efforts to Remove Bottlenecks



- Initial snapshot showed roughly half of the working inventory applications were awaiting action
- Removing bottlenecks in the process should address systemic delays in processing
- Actions in progress based on June 2022 data presented to PSTF
  - Supervisor Review
  - Source Test Review

#### **Dashboard Pending Action Trends**



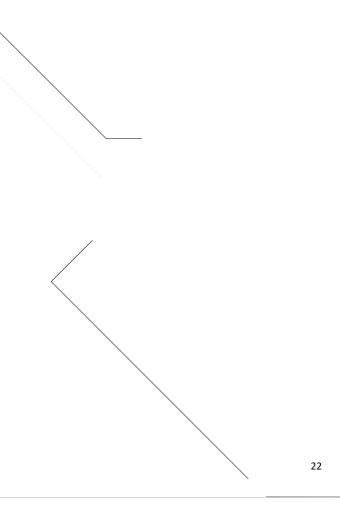
20

#### **Application Inventory Summary**

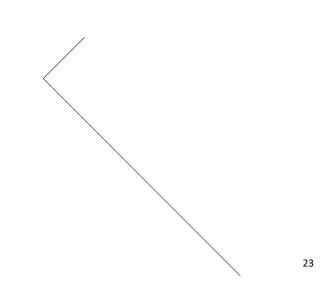
- Observed recent levelling of inventory growth
  - March 2022 retirements
  - May 2022 historic incoming application submittals
  - Continue to watch trends
- 29 promotions, WOC assignments, and new hires since June 2022
  - Approximately 20% of E&P staffing
- Strategic recruitment process
  - Expediting promotions and onboarding
- Planning for next wave of retirements March 2023
- Continue efforts to meet Permit Inventory Goals and Objectives

## Comments

Application Inventory Update



# **Online Filing Update**

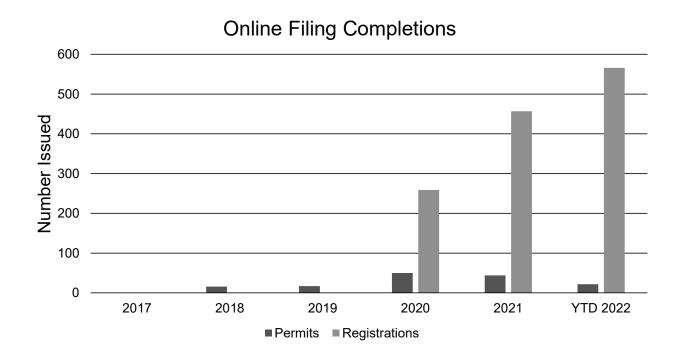


#### **Online Rule 222 Registration**

- New Modules Released:
  - 222-FO, Food Oven
  - 222-OS, Storage of Odorants
  - 222-U, Equipment Used to Store Aqueous Urea Solutions
  - 222-AT, Asphalt Day Tanker
  - 222-AH, Asphalt Pavement Heater
  - 222-DB, Diesel Fueled Boiler
  - 222-MT, Micro-Turbines
  - 222-PH, Portable Diesel Fueled Heater

- Previously Released Modules:
  - 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

#### **Online Filing Activity**



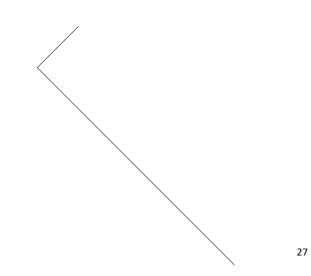
- Q4 Updates
  - Eight additional Rule 222 modules
  - Registered Emergency Engine Permit module

#### Development

- Source Test Tracking Portal
  - Ongoing testing by multiple divisions
  - Submission and routing of source tests and protocols
  - Additional updates to portal to address resource constraints
- CLean Air Support System (CLASS) Migration Project
  - CLASS includes permit processing platforms
  - Platform modernization
  - Multi-year, multi-divisional effort
  - Incorporate workflow project findings ("to-be" process mapping)

# **Online Filing Update**

Registration Permit - Emergency Engines



#### **Registration Permit** Background - Emergency Internal Combustion Engine

- Registration permits are available for engines that have been previously issued a Certified Equipment Permit (CEP)
- Registration permits are evaluated through a streamlined process with a reduced application fee (50% lower)
- To qualify for online permit issuance, the proposed installation must:
  - Have been previously issued a CEP (including with pollution control, if applicable)
  - Be located more than 1,000 feet of a school (K-12)
  - Not be subject to Title V or RECLAIM
  - If diesel, be less than 175 bhp rating



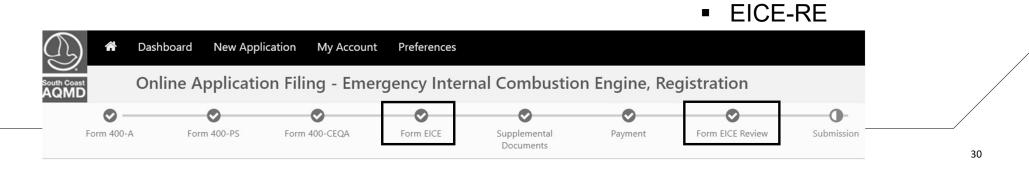




Coast Or	nline Application Filing - EICE-RE Equipment Confirmation		Hide Tooltip
EICE - Emerge	ency Electrical Generator - Certified Equipment		
	outh Coast AQMD's permit streamlining program, certain emergency generators have been pre-certified as an apply for a permit using the permit "registration" program that offers lower processing fees and shorter		perate these pre-
For additional cl	larification, please contact: onlinepermits@aqmd.gov.		_
Please review the	e questions below and click the yes/no button, to verify if your Emergency Internal Combustion Engine (EICE-RE) Equ	ipment meets the criteria for being permitted online using the EICE-RE form.	
Yes	ls this a natural gas, liquified petroleum gas (LPG) or other clean fuel powered certified generator, or have you co state or local requirements limit or prohibit installation due to safety or other health concerns?	nsidered using a clean fuel powered certified generator but determined that	
Yes	Has this engine been pre-certified by the South Coast AQMD?		
Yes	Is this engine to be located more than 1,000 feet from the outer boundary of a school (grades K-12)?	Screening questions prior	
No	Does this engine have an add-on control device?	questions phor	
Yes	Is this engine to be located less than 164 feet from a sensitive receptor?	to using module	
No	Is this a diesel-fueled engine?		

#### **Registration Permit - Emergency Engine**

South Coast	Dashboard New Application Online Application Filin	My Account Preferences	<ul> <li>Module completed final internal testing</li> </ul>
	Select Facility	Select or Type	<ul> <li>Additional thresholds in module for filing online</li> </ul>
		Choose the reason for application filing. O Dry-Cleaning Equipment	<ul> <li>All general forms are completed online:</li> </ul>
		O Emergency Internal Combustion Engine, Registration	■ 400-A
		<ul> <li>Fuel Dispensing And Storage Equipment</li> <li>Spray Booth - Automotive Refinishing Facility</li> </ul>	400-PS
		• Rule 222 Application Filing	<ul> <li>400-CEQA</li> </ul>



#### **Online Filing Update**

Form 400-A	Form 400-PS	Form 400-CEQA	Form EICE	Supplemental Documents	Payment	Form EICE Review	O- Submission	
rm 400-EICE > Facili pplication No:	ty : Status: Created							O Show/Hide Instructions
<ul> <li>Equipment Information</li> <li>Operating Schedule</li> </ul>	ion		nt Details	er(Application Number) 🕫		Fuel Type O*		
O Summary		Certified Ed	uipment Permit Numb	er(Application Number) O		*		
		Engine Ma	nufacturer <b>O</b> *			Engine Model Number	0.	
		Engine Ma	ximum Rating in BHP(S	tand-By) 0*		Engine Model Year (Mf	g) <b>O</b> *	
				~		equipment lodel Year	permit numb	ber
		Previous	- /	•	•		engines are	on the aqmd.gov

#### **Online Payment**



South Coast AQMD Online Payment

Online Invoice Payment >>> Payment Method

Please select the payment method you would like to use and click "Next" to proceed with Checkout.

#### Please note:

For credit card payments, a convenience fee will be added at the time of payment. The convenience fee is not retained by South Coast AQMD.
 South Coast AQMD is only able to process US based credit cards at this time. We're sorry about the inconvenience.

Select a Payment Method:

- O Credit card (convenience fee will be charged)
- O E-Check / Checking or savings account (no charge)

Next >>>

- Third party payment portal
- Payment online via credit card or e-check
- Credit card payment includes convenience fee due to provider

#### Registration Permit Evaluation Steps

- The Certified Equipment Permit is evaluated for compliance with all applicable rules
- Compliance with some rules under registration is demonstrated by meeting the screening criteria
- Completeness is met through final payment and attestation of the submittal by the applicant

Rules evaluated for compliance demonstration include:

- R212
- R401
- R402
- R404
- R431.1
- R431.2
- R1110.2

- Reg XIII
- R1303(a)
- R1303(b)(1)
- R1303(b)(2)
- R1401
- R1470
- R1472

#### **Registration Permit** Evaluation Screen

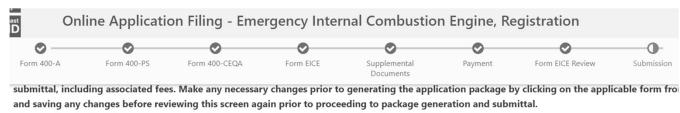
Form 430-A	Form 400-PS	Form 400-CEQA	Form DCE	Supplemental Documents	Payment	Form DCE Review	Submission		
AND-EICE > Facility :	e Passed								0 Show/Hide Instr
ule Evaluation									
mission Calculation		Click on each r	ule to see the details.						
rmit Preview		✓ Rule	: 212(c)(1) In Compliance						^
		🗸 Rule	212(c)(2) In Compliance						^
		🗸 Rule	: 212(c)(3) In Compliance						^
		🗸 Rule	: 401 In Compliance						^
		🗸 Rule	s 402 In Compliance		Rule comp	liance note	d		^
		🗸 Rule	: 404 In Compliance		-		- ied online, applic	cation to	^
		🗸 Rule	: 431.1 In Compliance		-		nd assigned to a		^
		🗸 Rule	: 1110(2) In Compliance		engineer				^
		🗸 Rule	RegXIII In Compliance		0				^
		✔ Rule	s 1303(a) In Compliance						^
		✔ Rule	: 1303(b)(1) In Compliance						^
		✔ Rule	: 1303(b)(2) In Compliance						^
		✓ Rule	: 1401 In Compliance						^

#### Registration Permit Permit Preview

#### Form 400-EICE > Facility : Show/Hide Instructions Application No: Status: Rule Passed Rule Evaluation Please review carefully Emission Calculation Revisions to either Equipment Description or Permit Conditions require submission of a new approval. Permit Preview EQUIPMENT DESCRIPTION Internal Combustion Engine, Generac, 6 Cylinder, Naturally Aspirated, Model 4.3LNGNA, 62.3 BHP, Natural Gas and/orLPG Fueled, with a Three Way Catalytic Converter and an Air/Fuel Ratio Controller, Driving an Emergency Electrical Generator. PERMIT CONDITIONS: 1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below. 2. This equipment shall be properly maintained and kept in good operating condition at all times. 3. An operational non-resettable totalizing timer shall be installed and maintained to indicate the engine elapsed operating time. 4. This engine shall not be operated more than 200 hours in any one year, which includes no more than 50 hours in any one year for maintenance and testing purposes and 4.2 hours in any one month for maintenance and testing purposes. 5. The operator shall keep a log of engine operations documenting the total time the engine is operated each month and specific reason for operation as: A. Emergency use.

#### If compliance is verified online a draft permit is available for preview

#### Package Generation and Submittal



The system may take a few moments to complete the process. We appreciate your patience. Online application tool support: onlinepermits@aqmd.gov.

#### Submit Application

400-A	Not Generated
400-PS	Not Generated
400-CEQA	Not Generated
EICE	Not Generated
Previous Cancel	Generate Application Package

Applicant must complete the final steps to submit:

- 1. Generate package\*
- 2. Attest to final form submittal
- 3. Submit

\* Once generated no further changes can be made to the application

# Package Generation and Submittal (cont.)

outh Coast Air Qu	ality Management District	
	13. What type of business is being conducted at this equipment location?: Testing Facility	Т
	14. What is your business primary NAICS Code? (North American Industrial Classification System): 111110	
	15. Are there other facilities in the South Coast AQMD jusrisdiction operated by the same operator?: No	
	16. Are there any schools (K-12) within 1000 feet of the facility property line?: No	
	Section F - Authorization I hereby certify that all information herein and information submitted with this application are true and correct.	
	17. Do you wish to review the permit prior to issuance?: No	
	18. Do you claim confidenatiality of data?: No	
	Page 1 of 1	
		_
	I agree that I have read the document	

Applicant must read and attest each page of the online forms in the generated package in order to finalize the submittal

# Package Generation and Submittal (cont.)

uth Coast Air Quality Management District	Welcome,
certify that by signing and submitting this agreement, I have read, understand, and accept the terms and conditions of the electronic signature	e agreement.
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this report and I believe that th accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and impri	
I understand and agree that I will be held as legally bound, obligated, or responsible by my use of my electronic signature as I would be us signature, and that legal action can be taken against me based on my use of my electronic signature in knowingly submitting false informat document to the SCAQMD Electronic Reporting System.	
I agree that I have read the statement	
Submission	
In order to submit the report, please ensure that you have checked all the checkboxes	

Applicant must read and attest each page of the online forms in the generated package in order to finalize the submittal

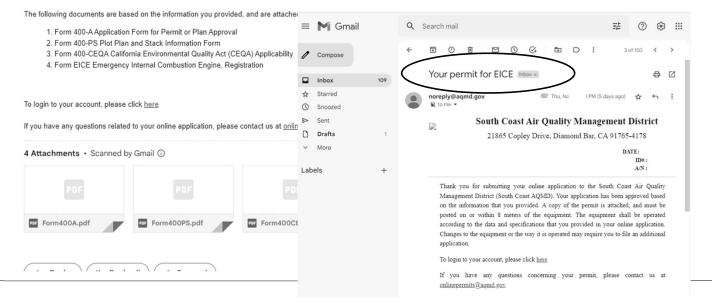
# Package Generation and Submittal (cont.)

The South Coast Air Quality Management District has received your on-line submission (Application #557417) for a permit to construct/operate a Emergency Internal Combustion Engine, Registratio

This email confirms that your online application process is complete.

If the online system had indicated that your application was evaluated as "In Compliance" with all applicable rules, your permit will be sent in a separate email shortly. If you do not receive an email w.

If the online system had indicated that your application could not be verified as compliant, a permit cannot be issued online. In this case, a South Coast AQMD engineer will review your online submit your application.



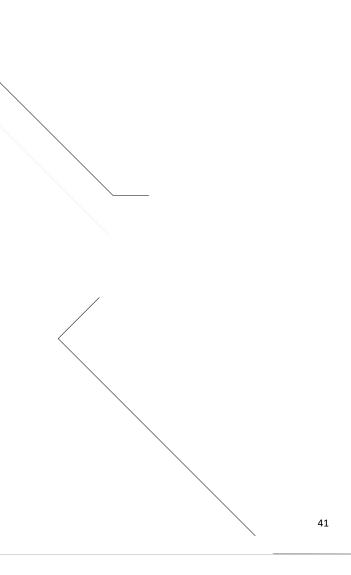
If compliance verified online, an email with the attested forms is sent to the applicant, followed by an email with the issued permit.



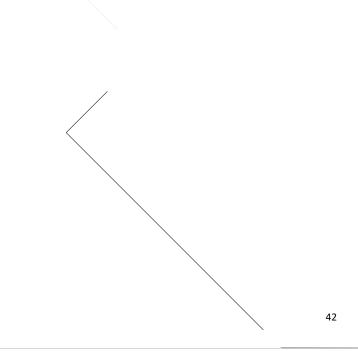
- Seeking interested parties for live application submittal
- Coordination between registration permit and non-registration permitting teams
- Non-qualified registration permit applications will have fees due and may need additional information to validate submittal
- Non-qualified registration permit applications would be eligible for XPP processing

# Comments

Online Filing Update

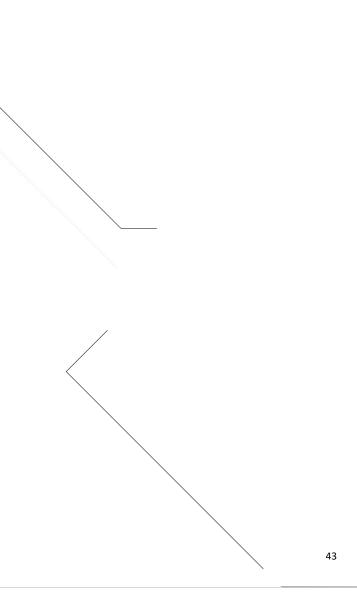


# **Other Business**



# Comments

Other Business



## **Public Comment**