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

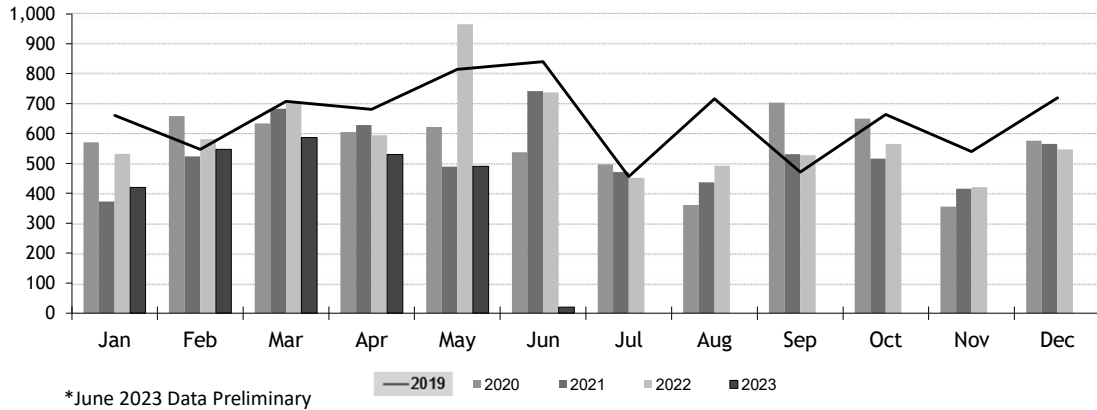Source Test Tracking Portal

Other Business and Public Comment

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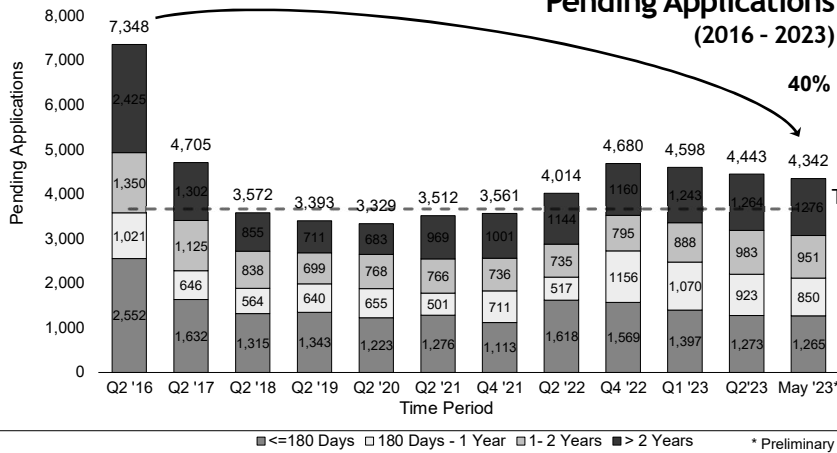# Application Inventory Update

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Permit Application Activity

Number of Applications Received per Month

*June 2023 Data Preliminary

Legend: 2019 | 2020 | 2021 | 2022 | 2023

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Pending Application Inventory

Pending Applications (2016 – 2023)

40%

Target: 50%

* Preliminary

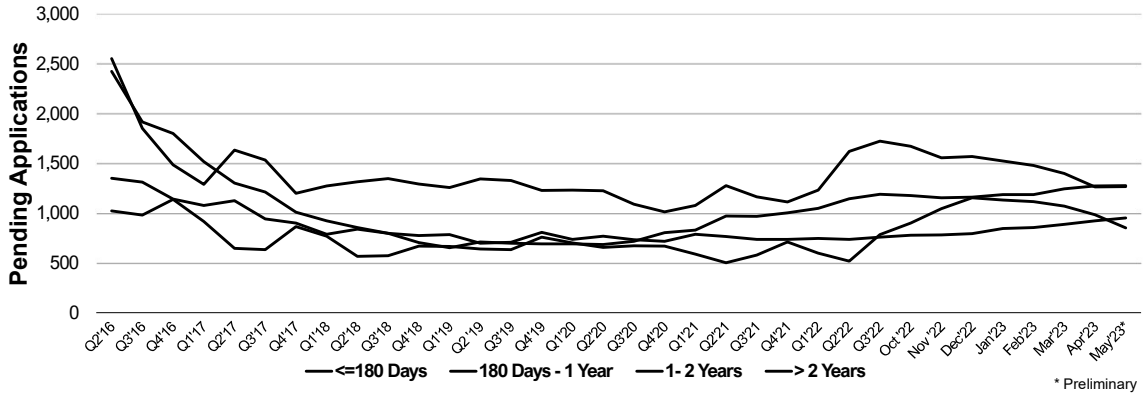Legend: <=180 Days | 180 Days - 1 Year | 1- 2 Years | > 2 Years

- 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)
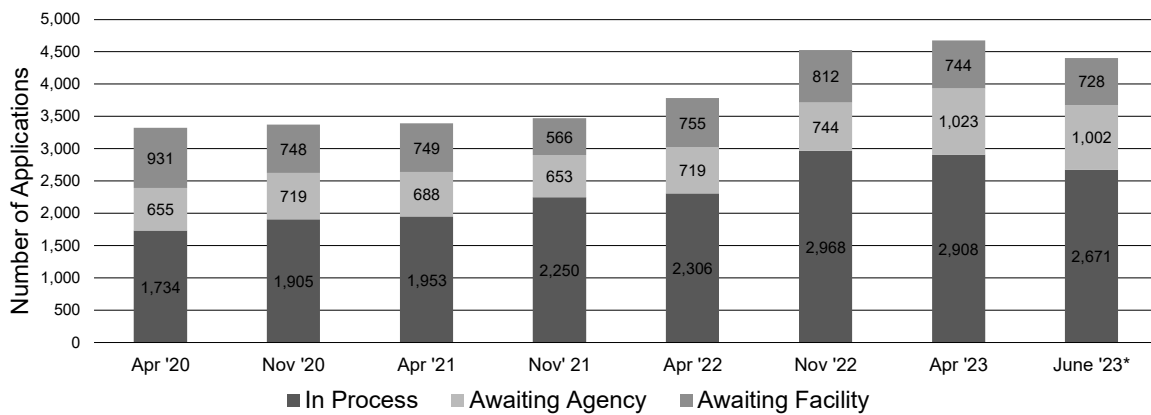
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Total Pending Applications (2016-2023)

Legend: <=180 Days — 180 Days - 1 Year — 1- 2 Years — > 2 Years

* Preliminary

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Dashboard Pending Action Trends

Period	Awaiting Facility	Awaiting Agency	In Process
Apr '20	931	655	1,734
Nov '20	748	719	1,905
Apr '21	749	688	1,953
Nov' 21	566	653	2,250
Apr '22	755	719	2,306
Nov '22	812	744	2,968
Apr '23	744	1,023	2,908
June '23*	728	1,002	2,671

Legend: ■ In Process ■ Awaiting Agency ■ Awaiting Facility

*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	
Add'l Info. Req.	**7%**	Engineering Evaluation and Administrative Processing	62%	Compliance Review Draft	1% 3%	**Supv/Mgr Review**	**14%**
Related App A/I	1%					Related App Proc.	3%
						Other Agency Rev.	2%
				Conduct Source Test	**2%**	**Source Test Review**	**1%**
				Awaiting Constr.	2%	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	
Add'l Info. Req.	**10%**	Engineering Evaluation and Administrative Processing	50%	Compliance Review Draft	2% 2%	**Supv/Mgr Review**	**13%**
Related App A/I	1%					Related App Proc.	6%
						Other Agency Rev.	1%
				Conduct Source Test	**6%**	**Source Test Review**	**3%**
				Awaiting Constr.	4%	Policy Review	1%
						Field Eval	< 1%
						Public Notice	< 1%

Higher portion of aged applications are awaiting facility action

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Comments

Application Inventory Update

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Strategic Initiatives

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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)
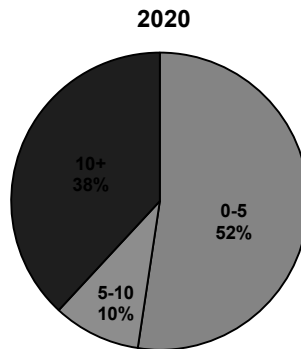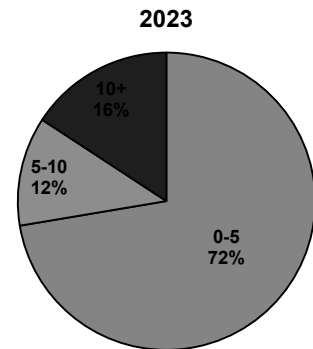 - Current pending application inventory: 4,340

7,348

3,674

2016 Inventory Reduction
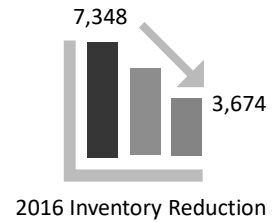
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E&P Staffing Turnover and Attrition
Years Experience in Role – Processing Engineers

2015

0-5
22%

5-10
15%

10+
63%
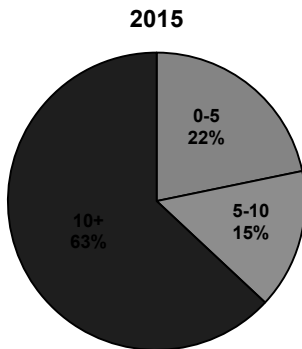
- Mean ~ 13 yrs
- Median ~ 15 yrs

2020

10+
38%

0-5
52%

5-10
10%

- Mean ~ 8 yrs
- Median ~ 2.5 yrs

2023

10+
16%

5-10
12%

0-5
72%

- Mean ~ 5 yrs
- Median < 2 yrs

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E&P Staffing
Recent Efforts

Current Total Budgeted FTEs: 173
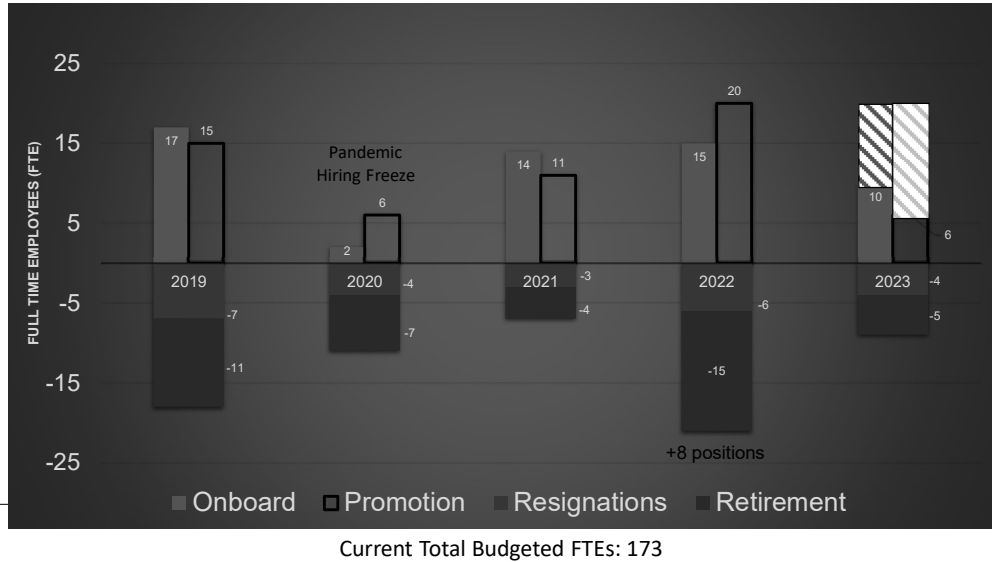
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Workflows
Analysis and Adjustments in 2022

- 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
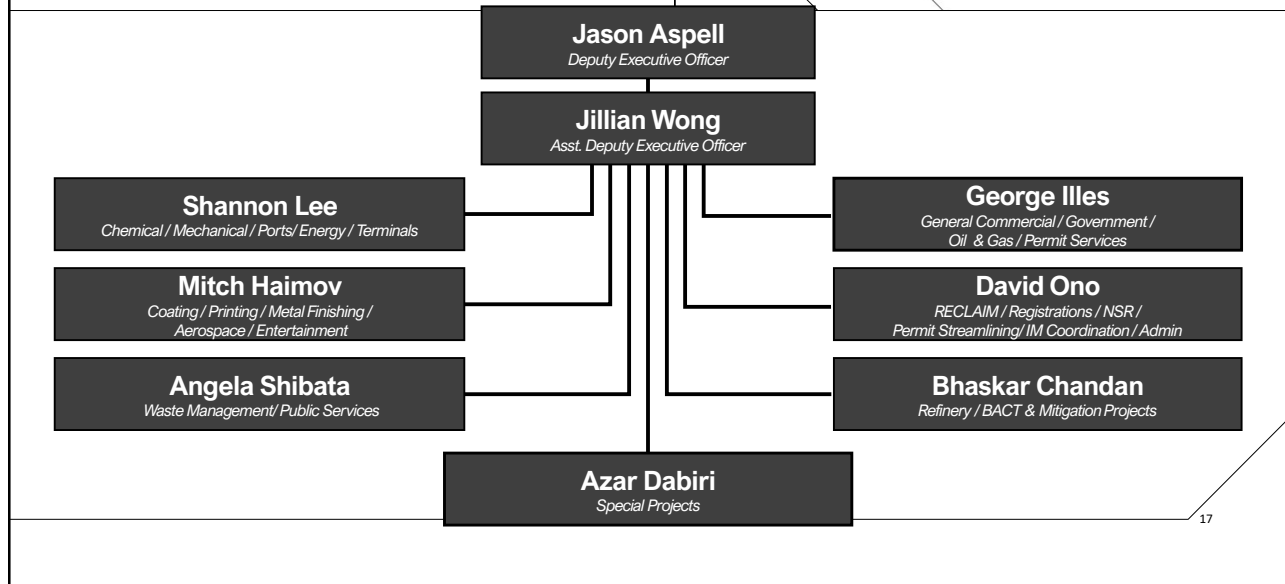   - Prioritized aged source test reviews
- Redistribution of workloads
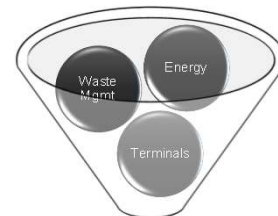
Single Supervisor Review

Removing all single review "points of failure" in the 6 permitting teams

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Updated Organizational Chart

Jason Aspell
Deputy Executive Officer

Jillian Wong
Asst. Deputy Executive Officer

Shannon Lee
Chemical / Mechanical / Ports / Energy / Terminals

George Illes
General Commercial / Government / Oil & Gas / Permit Services

Mitch Haimov
Coating / Printing / Metal Finishing / Aerospace / Entertainment

David Ono
RECLAIM / Registrations / NSR / Permit Streamlining / IM Coordination / Admin

Angela Shibata
Waste Management / Public Services

Bhaskar Chandan
Refinery / BACT & Mitigation Projects

Azar Dabiri
Special Projects

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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 <u>not</u> 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
• Developed criteria for when CEQA review is triggered • Developed template for Responsible Agency Findings in response to recent case law	• Developed new various locations and site-specific location permits for mobile fuelers • Screening tables for throughputs • Standardized approach	• Large incoming workload of E85 gas stations • Allows simplified references for emission factors for permitting • Developed screening tables for throughput	• Requirement under New Source Review • Reduced need for external resources • Increased operational efficiencies	• Streamlined and simplified source test requirements • Reduces operations needed for testing • Template for permit conditions • In progress

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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

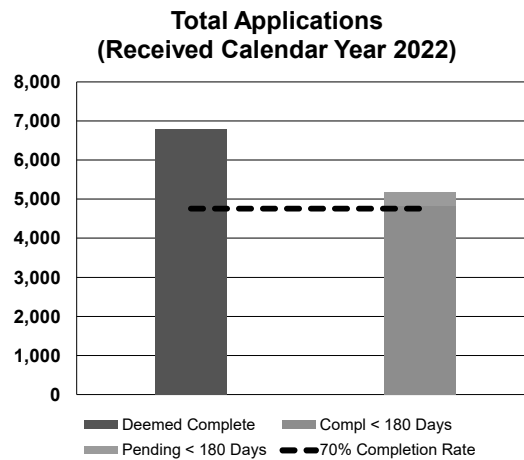   - New goals reflective of current challenges and resources are under development
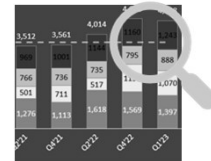
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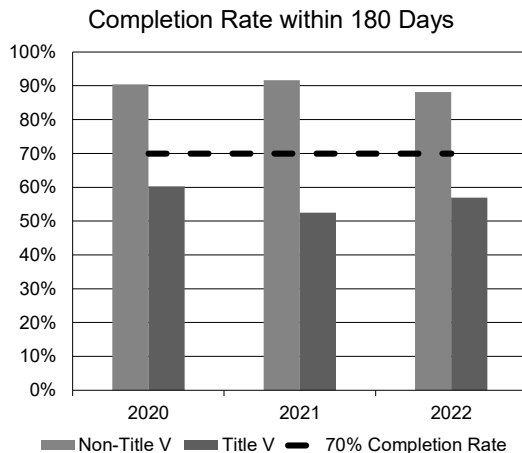# E&P Goals – FY2023/2024

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)

Legend: Deemed Complete · Compl < 180 Days · Pending < 180 Days · 70% Completion Rate

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E&P Goals – Considerations for PEP

Completion Rate within 180 Days

[bar chart showing completion rates for 2020, 2021, 2022 with Non-Title V and Title V bars and a dashed 70% Completion Rate line]

Legend: Non-Title V ■ Title V ━ 70% Completion Rate

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

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

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
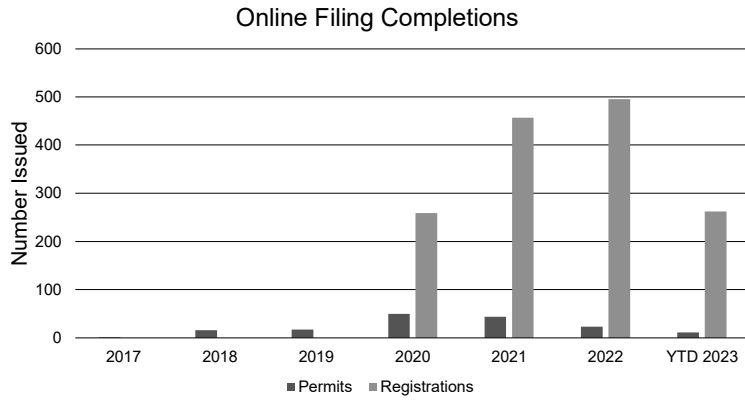- 222-PH, Portable Diesel Fueled Heater

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

Online Filing Completions

- Q2 Update
  - Registered Emergency Engine Permit module is live
  - One issued online, two in-house
  - Recommend contacting E&P for first time users

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
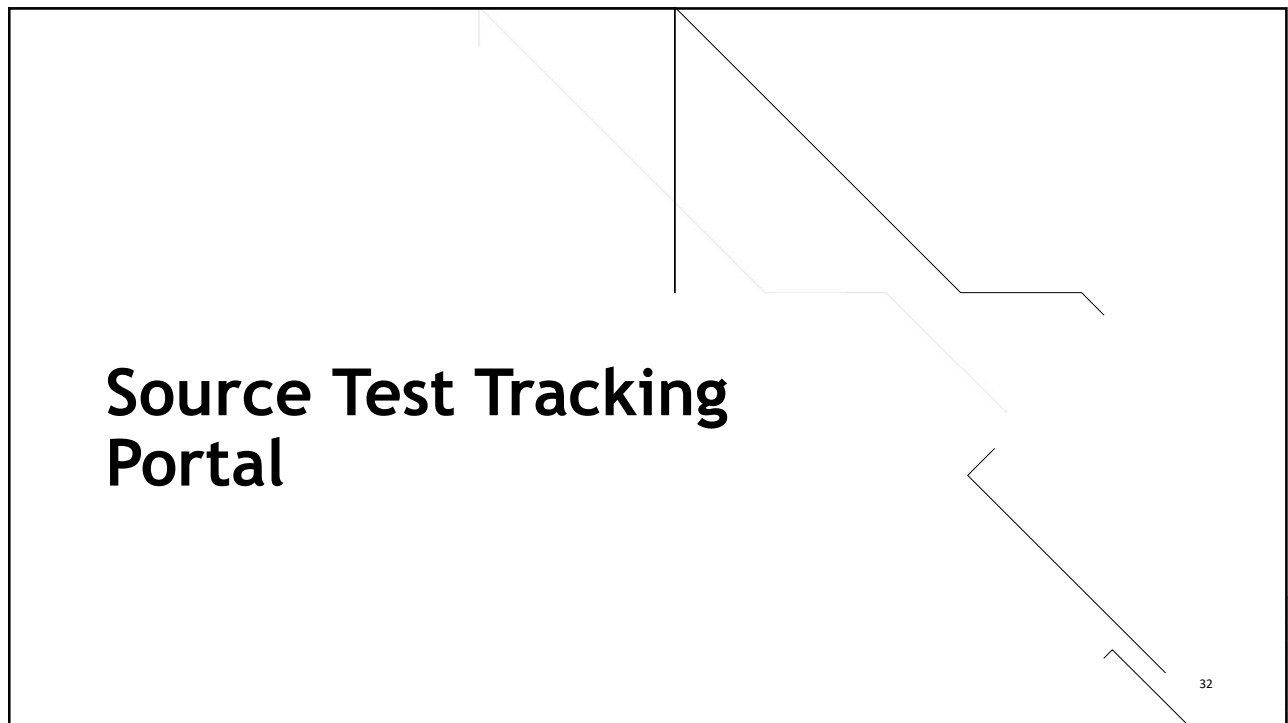 - Multi-year, multi-divisional effort
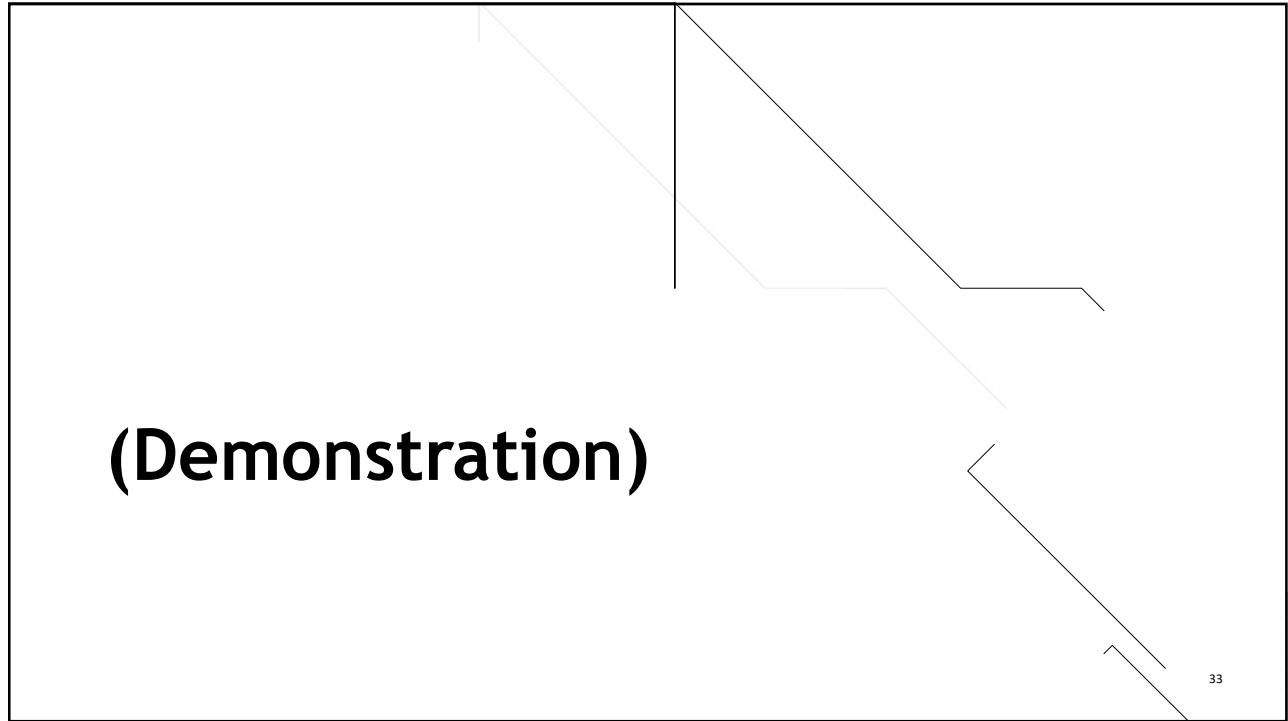
Comments

Online Filing Update

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Source Test Tracking Portal

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(Demonstration)

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Comments

Source Test Tracking Portal

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Other Business

Comments

Other Business

Public Comment