PERMIT STREAMLINING TASK FORCE SUBCOMMITTEE

MEETING
June 16, 2022

Permit Streamlining Task Force Subcommittee

June 16, 2022

Agenda

Pending Application Inventory

Rule 1109.1 Implementation

Pending Permit Application Status Dashboard Update

Online Tools Development

Other Issues and Public Comment

Pending Application Inventory Update

Resource Update

Staffing

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

Staffing Priorities

- Waste Management Team
- Refinery Team
- Exploring retirees/contractors (RFP released)
- RECLAIM Sunset / New Source Review amendment
 - Title V permit updates
  - IM infrastructure

COVID-19 Impact Update

- Return to office – On hold

- Extended teleworking
  - Committed to operational goals
  - Office presence

- Hybrid meetings – On hold

- CPP – On hold

ZR-AUDITORIUM

Permit Processing
2016 Inventory Reduction Initiative

Pending Applications
(2016 – 2022)
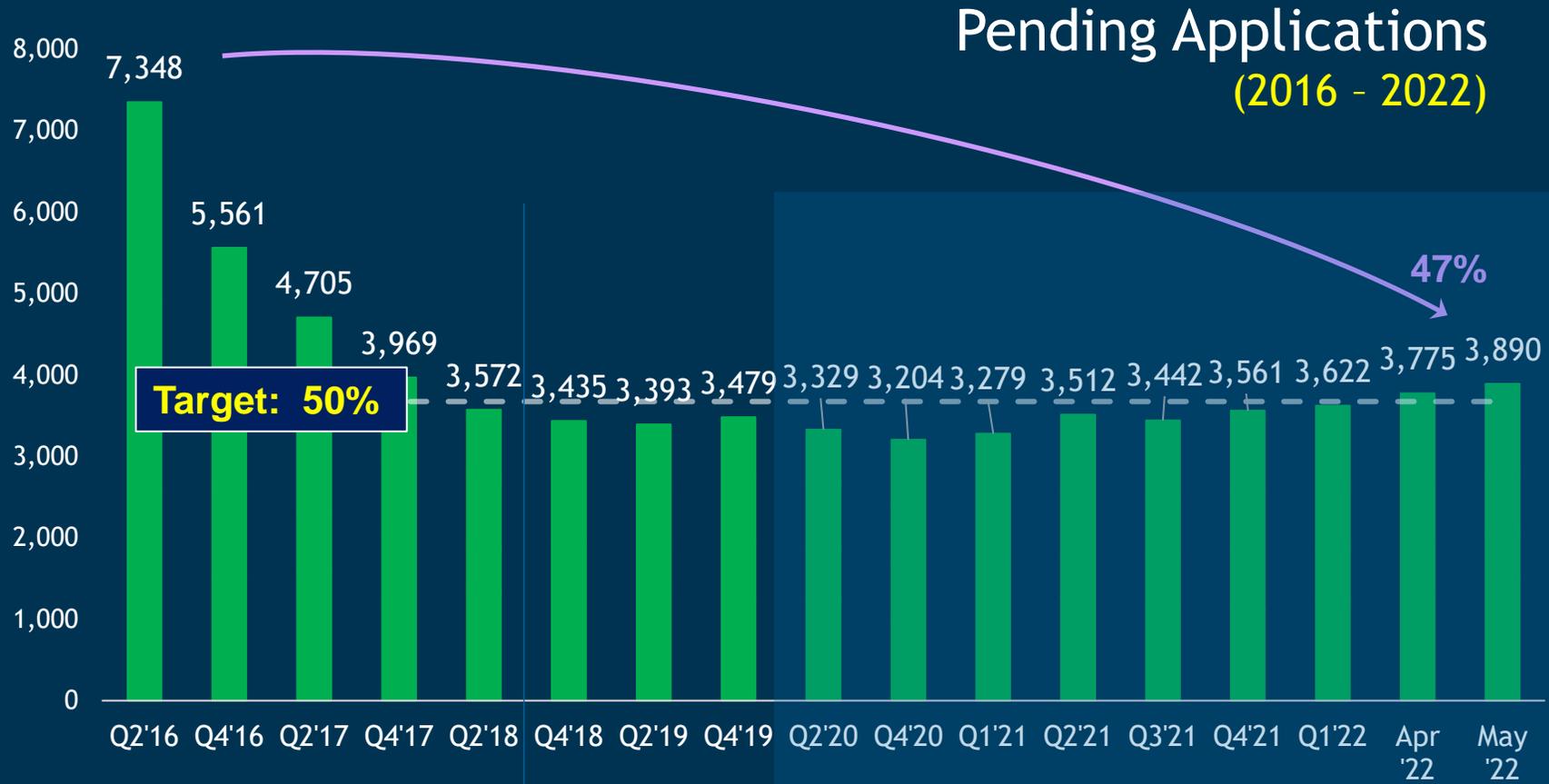
Pandemic and staff turnover continue to present challenges

Quarter	Value
Q2'16	7,348
Q4'16	5,561
Q2'17	4,705
Q4'17	3,969
Q2'18	3,572
Q4'18	3,435
Q2'19	3,393
Q4'19	3,479
Q2'20	3,329
Q4'20	3,204
Q1'21	3,279
Q2'21	3,512
Q3'21	3,442
Q4'21	3,561
Q1'22	3,622
Apr '22	3,775
May '22	3,890

Target: 50%

47%

Pending Applications less PCs Issued
(2016 – 2022)
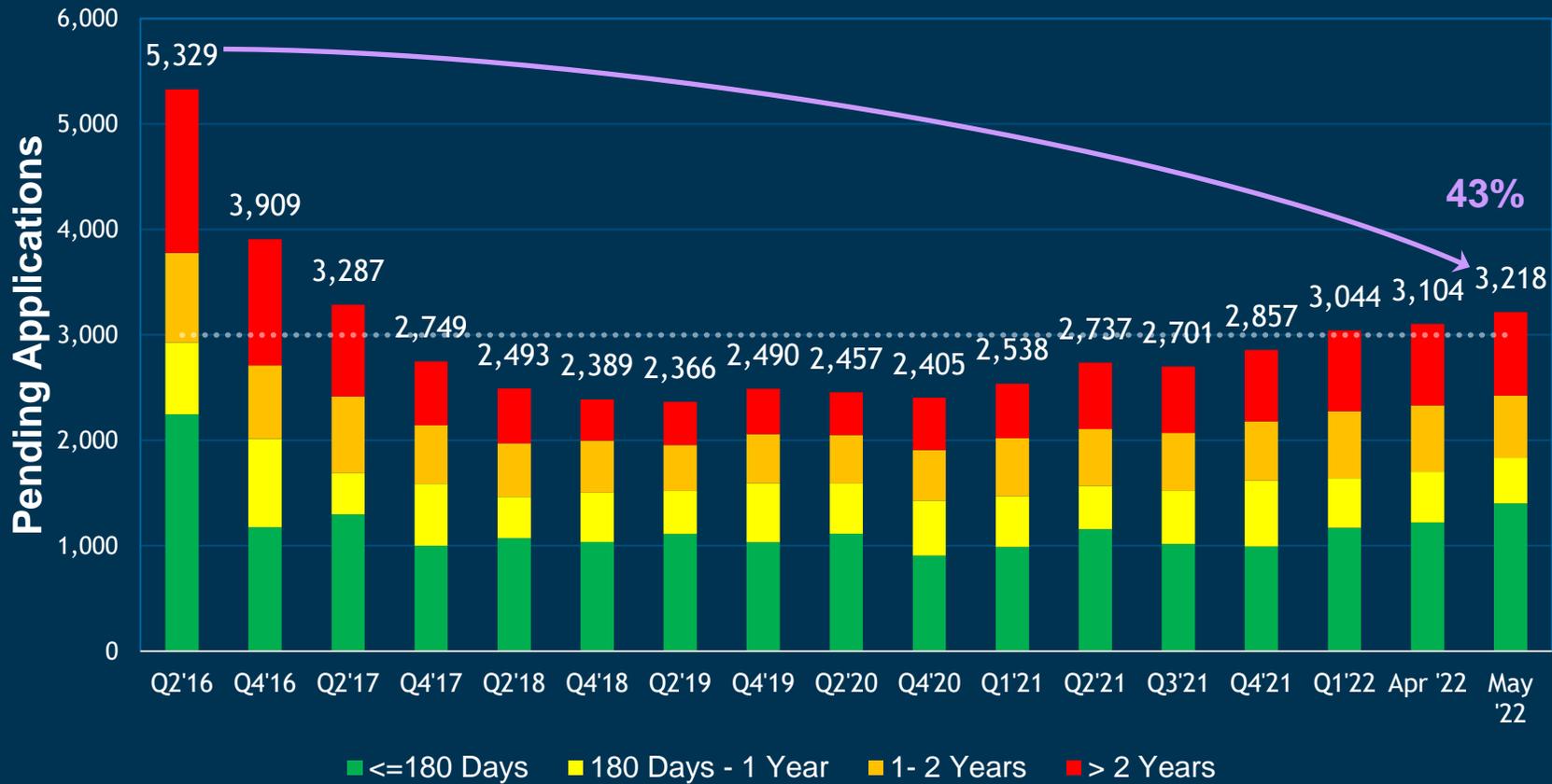
Ongoing Goal
Maintain pending applications without PC, less RECLAIM landing rule apps less than 3,000

Title V

~ 50% in review / update
~ 30% renewals received
recent 12 months
vs. 20% average

Pending Applications

6,000
5,000
4,000
3,000
2,000
1,000
0

5,329
3,909
3,287
2,749
2,493
2,389
2,366
2,490
2,457
2,405
2,538
2,737
2,701
2,857
3,044
3,104
3,218

43%

Q2'16 Q4'16 Q2'17 Q4'17 Q2'18 Q4'18 Q2'19 Q4'19 Q2'20 Q4'20 Q1'21 Q2'21 Q3'21 Q4'21 Q1'22 Apr '22 May '22

■ <=180 Days   ■ 180 Days - 1 Year   ■ 1- 2 Years   ■ > 2 Years

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COVID-19
Permit Application Trends

Permit Application Activity

Number of Applications Received per Month
### (2019 – 2022)
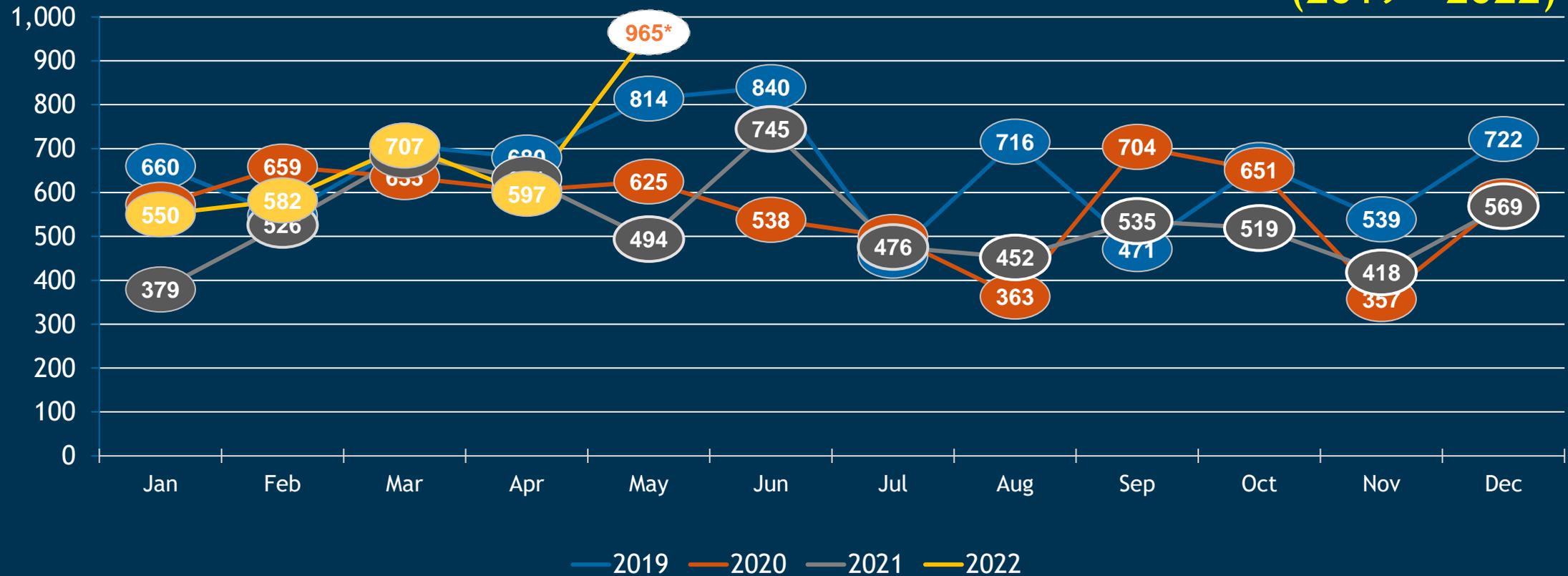
Permit Application Activity

Number of Applications Received per Month
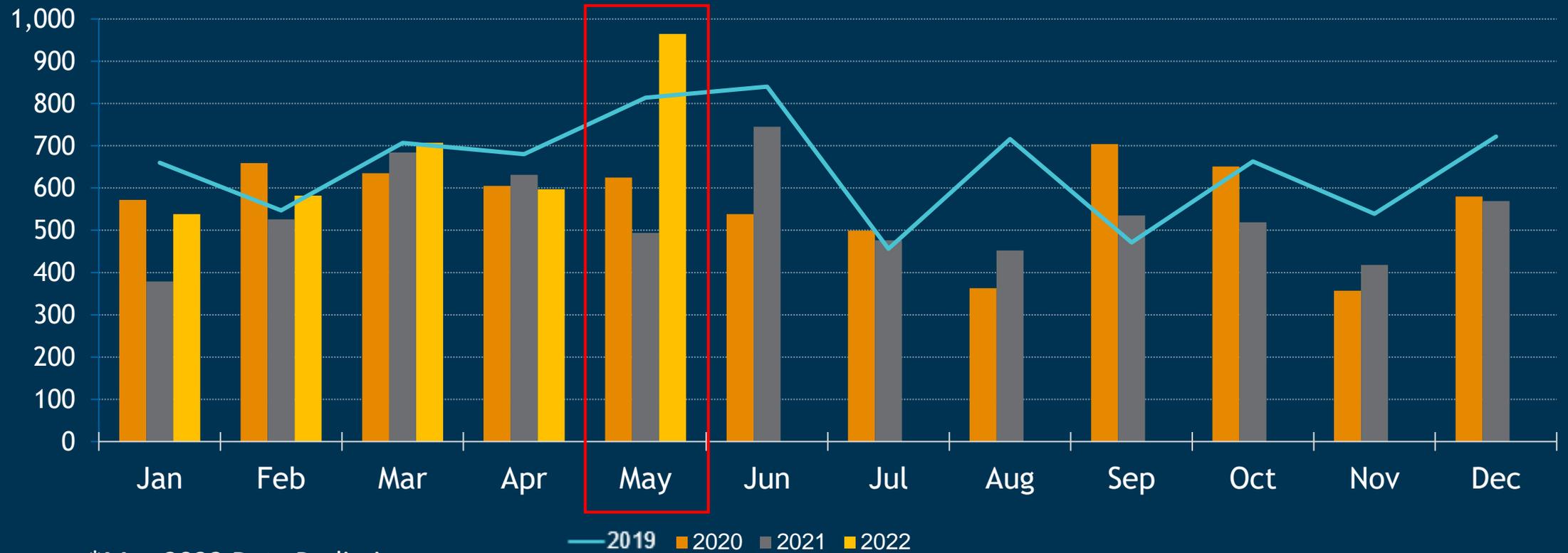
*May 2022 Data Preliminary

Legend: 2019 · 2020 · 2021 · 2022

Dashboard Metrics

Total Pending Applications (2016-2022)
Excl. < 180 Days

Pending Applications

■ 180 Days - 1 Year	■ 1- 2 Years	■ > 2 Years

Q2'16: 4,796
Q3'16: 4,205
Q4'16: 4,078
Q1'17: 3,509
Q2'17: 3,073
Q3'17: 2,786
Q4'17: 2,772
Q1'18: 2,477
Q2'18: 2,257
Q3'18: 2,165
Q4'18: 2,145
Q1'19: 2,105
Q2'19: 2,050
Q3'19: 2,036
Q4'19: 2,253
Q1'20: 2,126
Q2'20: 2,106
Q3'20: 2,120
Q4'20: 2,190
Q1'21: 2,203
Q2'21: 2,236
Q3'21: 2,279
Q4'21: 2,448
Q1'22: 2,390
May '22: 2,345
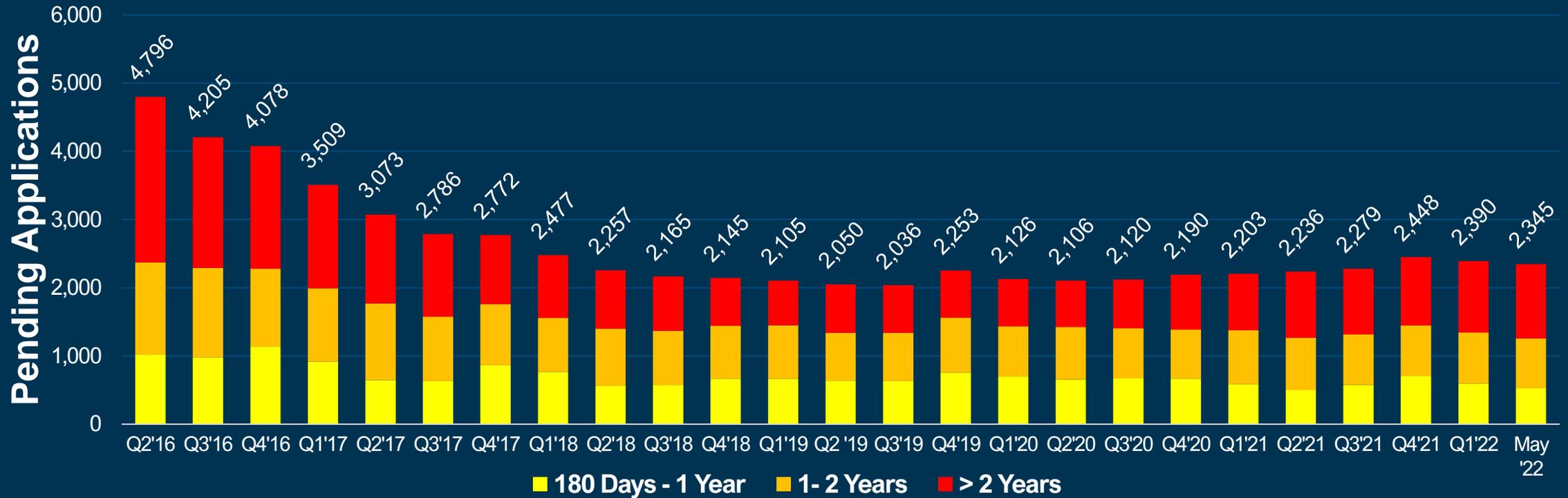
Total Pending Applications (2016-2022)
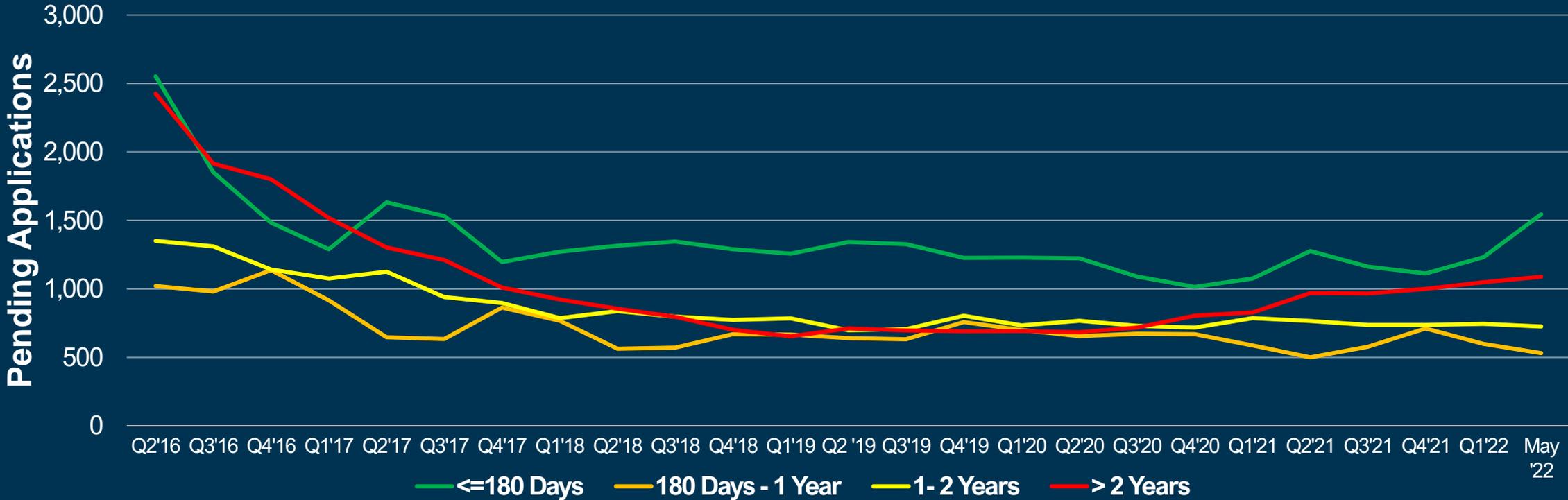
Total Pending Applications (2016-2022)
Excl. < 180 Days w/o PCs Issued

Pending Applications

Values (total, top of each bar):
- Q2'16: 3,082
- Q3'16: 2,793
- Q4'16: 2,730
- Q1'17: 2,342
- Q2'17: 1,989
- Q3'17: 1,805
- Q4'17: 1,749
- Q1'18: 1,551
- Q2'18: 1,420
- Q3'18: 1,374
- Q4'18: 1,351
- Q1'19: 1,344
- Q2 '19: 1,253
- Q3'19: 1,262
- Q4'19: 1,456
- Q1'20: 1,396
- Q2'20: 1,409
- Q3'20: 1,422
- Q4'20: 1,498
- Q1'21: 1,548
- Q2'21: 1,579
- Q3'21: 1,684
- Q4'21: 1,863
- Q1'22: 1,852
- May '22: 1,814

Legend: ■ 180 Days - 1 Year ■ 1- 2 Years ■ > 2 Years
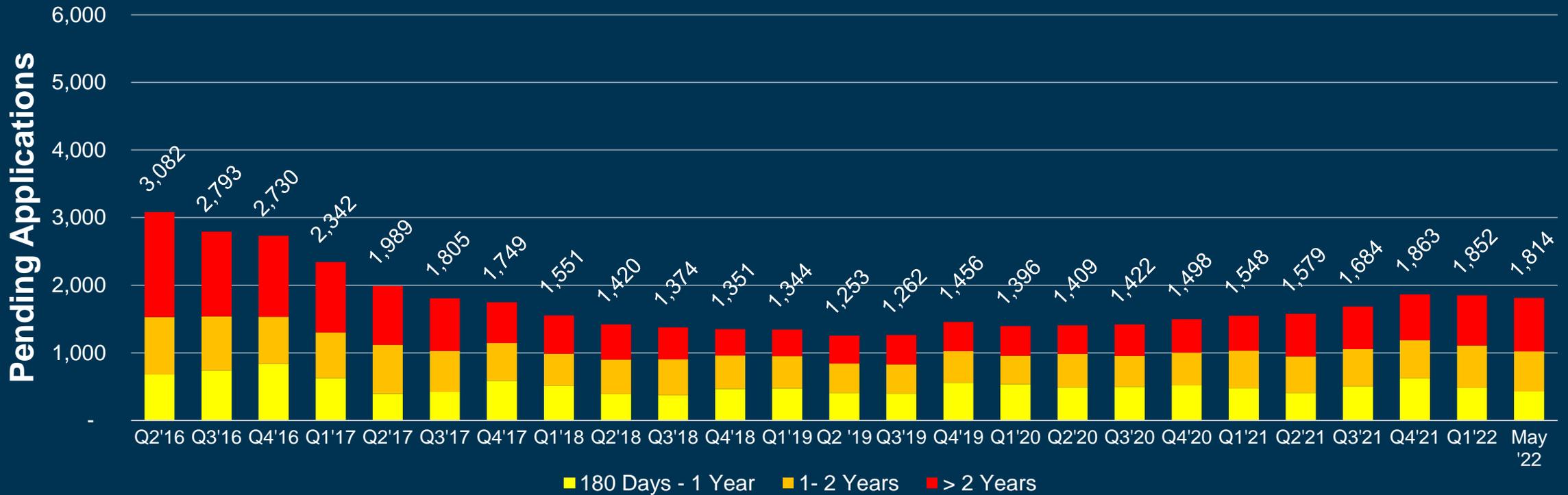
Pending Applications (2016-2022) w/o PCs Issued
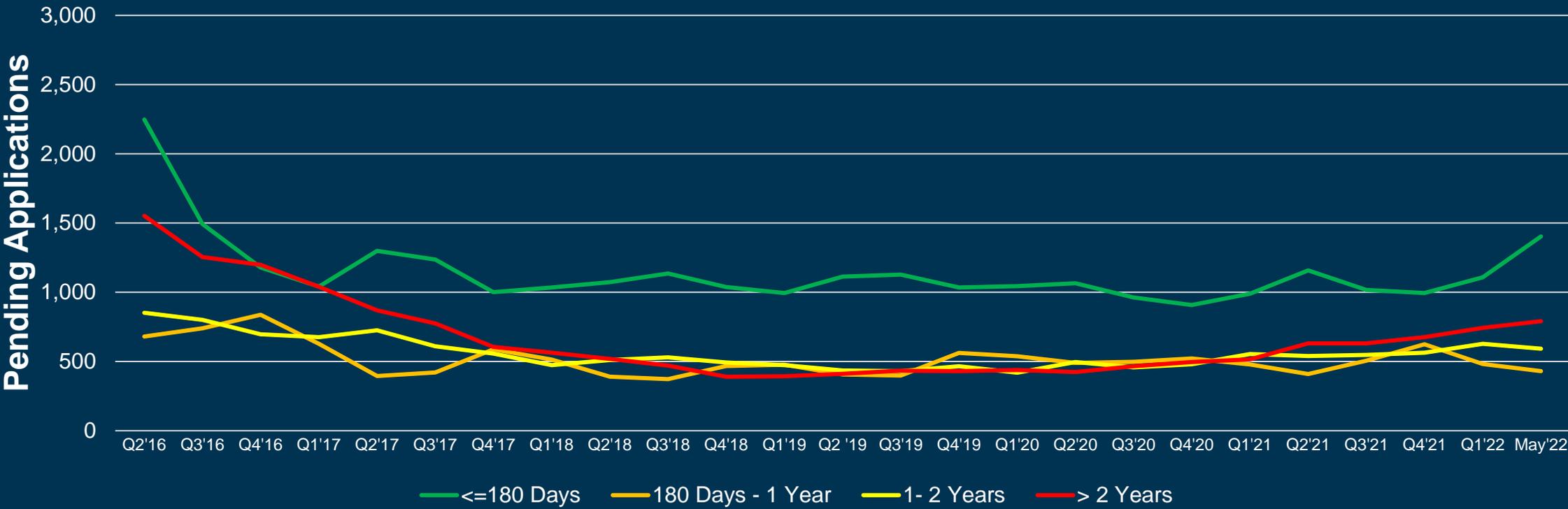
Rule 1109.1 Implementation

Rule 1109.1 - Current Status

- Multiple meetings with WSPA
  - Goal: Clarify and streamline permit application process
  - Encourage early submittal of applications
  - CEQA considerations
- Developed and finalized guidance document
- IM system updated to track activity
- First report planned for Q3/Q4 2022

- 33 applications received
- Approximately 45 total applications expected by first July 1, 2022 deadline

Pending Permit Application Status Dashboard Update

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
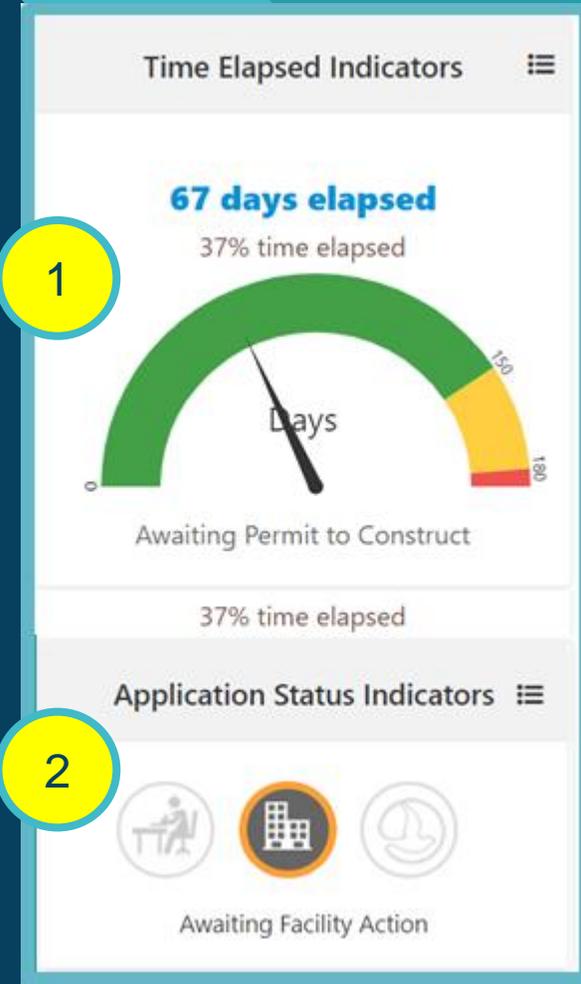
Pending Permit Application Status Dashboard
## Debottlenecking Efforts

October 2019
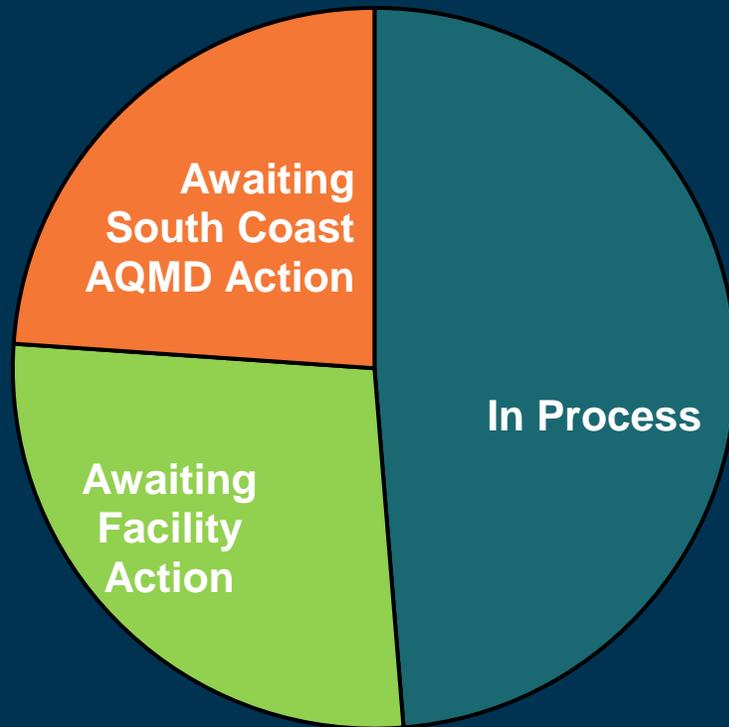
- Initial snapshot showed roughly half of the working inventory applications were awaiting action

- Removing bottlenecks in the process should address systemic delays in processing

Pending Permit Application Status Dashboard
Debottlenecking Efforts

April 2020

- Awaiting South Coast AQMD Action
- Awaiting Facility Action
- In Process

April 2022

- Awaiting South Coast AQMD Action
- Awaiting Facility Action
- In Process
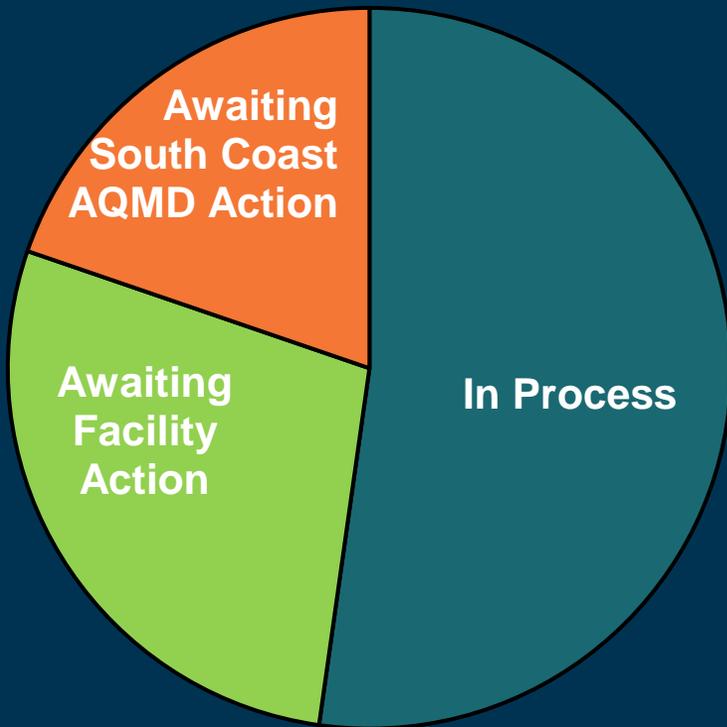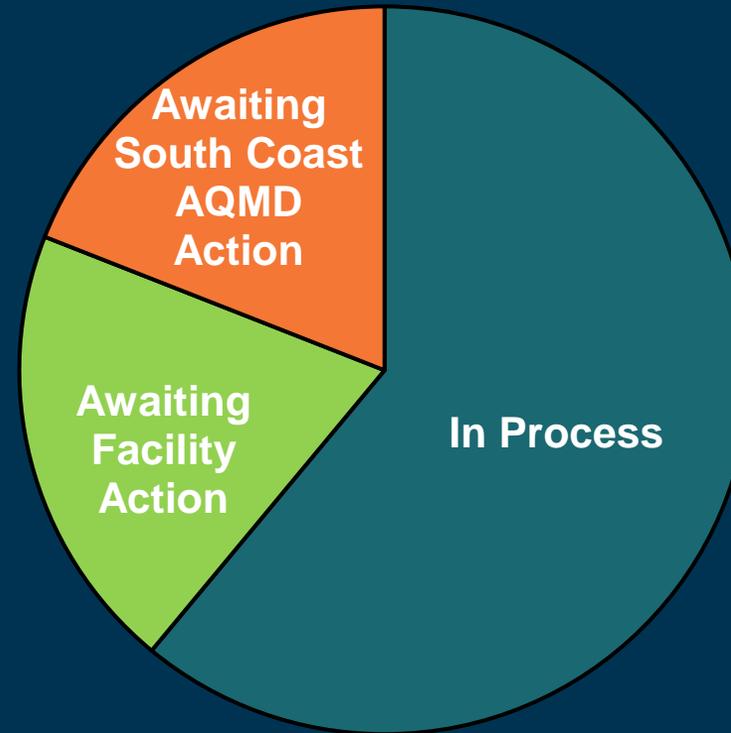
Dashboard Pending Action Trends

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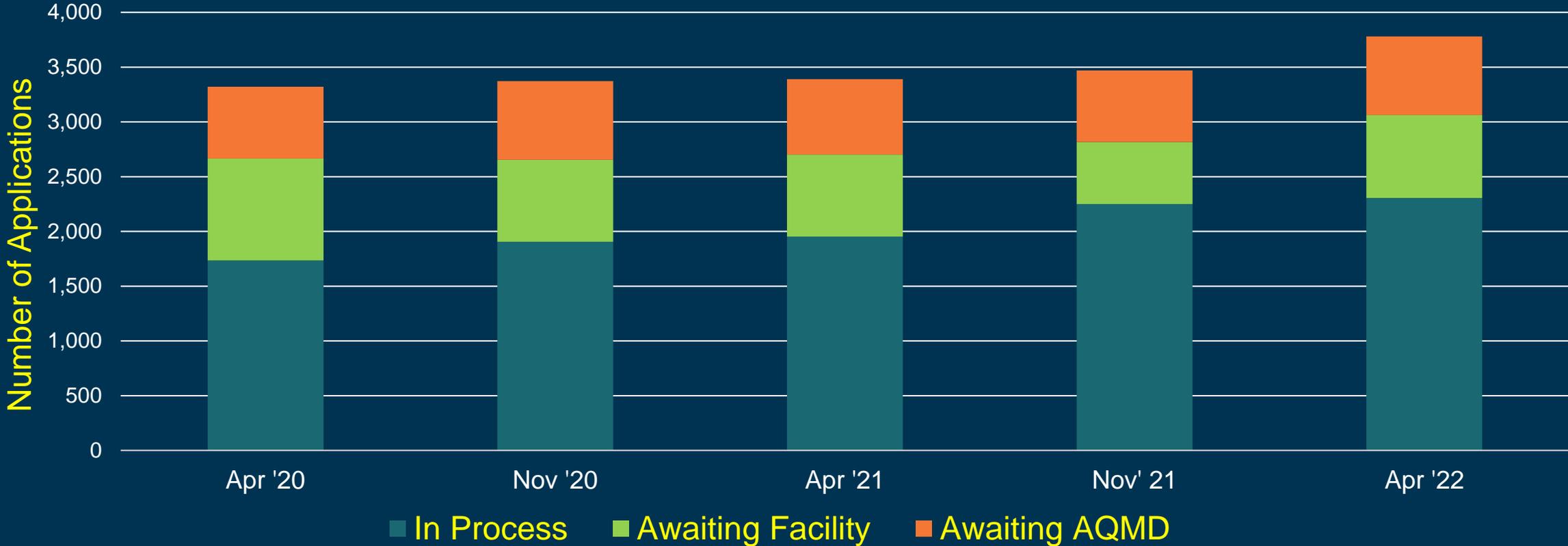
Pending Application Status Dashboard
Initial Observations – Snapshot (October 2019, cont.)

Completeness Determ. (Facility Action)		In Process		Awaiting Facility Action		Awaiting South Coast AQMD Action	
Add. Info. (A/I) Req	14%	Engineering Evaluation and Administrative Processing	41%	Compliance Review Draft	5%	Supv/Mgr Review	7%
Related App A/I	1%			Public Notice Distr.	1%	Related App Proc.	5%
Fee Resolution	< 1%				< 1%	Source Test Review	4%
				Conduct Source Test	6%	Policy Review	3%
				Awaiting Constr.	3%	Field Eval	3%
						Other Agency Rev.	1%
						Public Notice	1%
						HRA / Modeling	< 1%

Pending Permit Application Status Dashboard
November 2021 Snapshot

Completeness Determ. (Facility Action)		In Process		Awaiting Facility Action		Awaiting South Coast AQMD Action	
A/I Req.	7%	Engineering Evaluation and Administrative Processing	65%	Compliance Review Draft	< 1% 1%	Supv/Mgr Review	9%
Related App A/I	1%					Related App Proc.	3%
				Conduct Source Test	3%	Source Test Review	3%
				Awaiting Constr.	4%	Policy Review	1%
						Field Eval	< 1%
						Other Agency Rev.	1%
						Public Notice	< 1%

Pending Permit Application Status Dashboard
April 2022 Snapshot

Completeness Determ. (Facility Action)		In Process		Awaiting Facility Action		Awaiting South Coast AQMD Action	
A/I Req.	10%	Engineering Evaluation and Administrative Processing	61%	Compliance	1%	Supv/Mgr Review	9%
Related App A/I	1%			Review Draft	2%	Related App Proc.	4%
						Source Test Review	3%
				Conduct Source Test	3%	Policy Review	1%
				Awaiting Constr.	1%	Field Eval	< 1%
						Other Agency Rev.	1%
						Public Notice	< 1%

Actions taken in response to Dashboard data

Pending Permit Application Status Dashboard
April 2022 Snapshot (cont.)

Awaiting action categories with longest average processing time:

- Awaiting SCAQMD
  - Policy Decision (35 apps)
  - Source Test Results Review (97)
  - Field Evaluation (18)
  - Related Applications Processing (153)
  - BACT/LAER Determination (2)

- Awaiting Facility
  - Awaiting Construction (119 apps)
  - Conduct Source Testing (118 apps)
- In Process
 - CEQA Analysis (13)

Online Filing Update

Online Rule 222 Registration

- Newly Released Modules:
  - 222-CT, Cooling Towers
  - 222-TP, Tar Pots
  - 222-PW, Pressure Washers
- Previously Released Modules:
  - 222-A, Negative Air Machines (Asbestos)
  - 222-B, Boilers (1-2 mmBtu/hr)
  - 222-C, Commercial Charbroilers
- Represents > 80% of R222 Registrations

- Testing In Progress:
  - Food Oven
  - Storage of Odorants
  - Equipment Used to Store Aqueous Urea Solutions
  - Asphalt Day Tanker
  - Asphalt Pavement Heater
  - Diesel Fueled Boiler
  - Micro-Turbines
  - Portable Diesel Fueled Heater

Online Filing Activity

Online Filing Completions
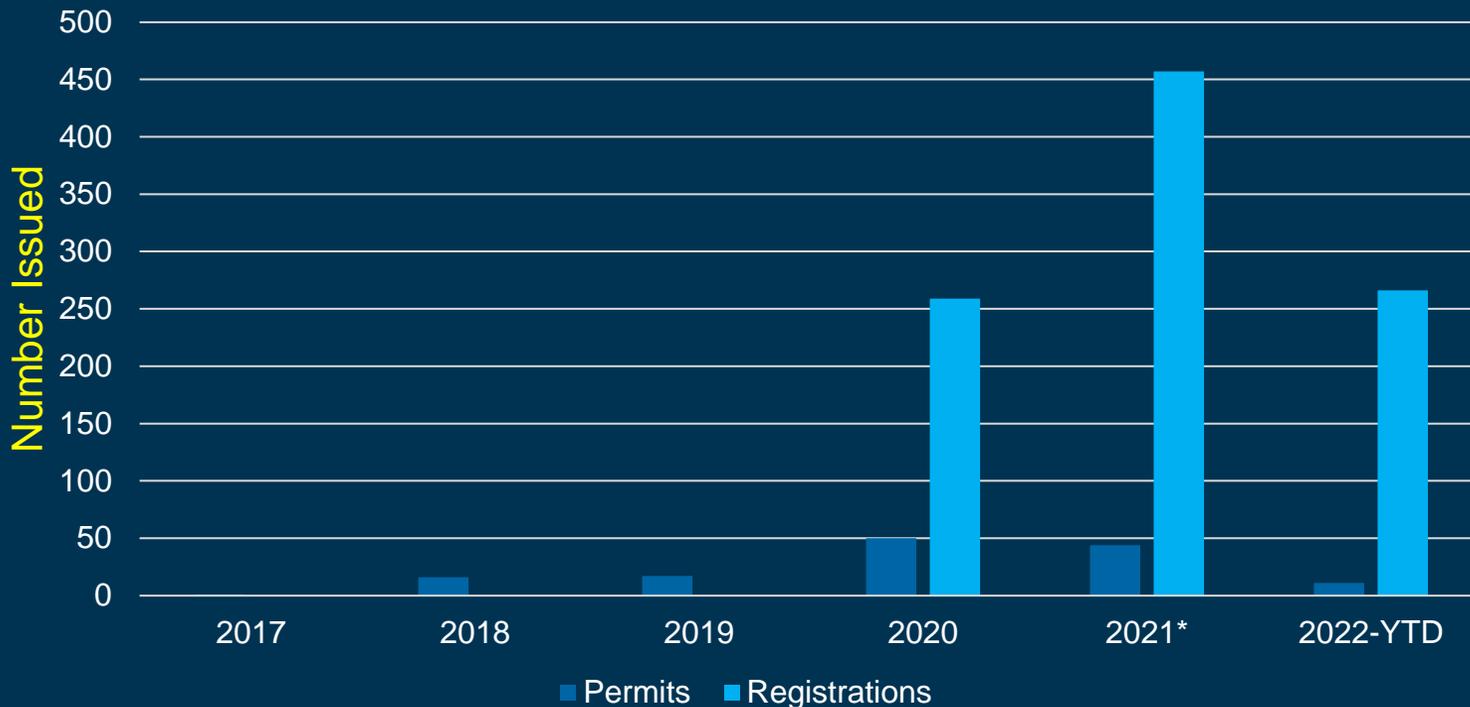
- ~80% of R222 are for Negative Air Machine, balance is Charbroiler and Boiler
- Rule 1403 Online Notification Filing and R222 Negative Air Machine Online Filing work in tandem
- Testing complete on three additional R222 modules plus Registered Emergency Engines

Development

- Occasional software releases for data cleanup/program improvements
- Necessary to keep online programs consistent with rule changes
- Additional R222 Modules in testing stage
- Emergency IC Engine registration permit module in review
  - Online filing limited to certified engines with prescribed conditions
  - Seeking external volunteers to test module
- Workflow updates
  - IM to initiate building of individual modules

Source Test Portal Update

- Released November 2021 internally for testing by multiple divisions
  - Submission and routing of source tests and protocols
  - Electronic review and approval
  - Electronic communication and status / dashboard functionality
  - Online form processing (ST-1 / ST-2)
- Reiterative testing initiated and ongoing

Other Business

Public Comment