



Permitting Strategies

Finance and Administration Committee

July 16, 2025

Pamela Leong

Director

Engineering

Presentation Outcome

Consider and discuss an update on the implementation of Permitting Strategies to improve timeliness, consistency, and transparency of the Air District's permit process.

Presentation Outline

Background

- Recap Audit Findings and Corrective Action Plan
- Transition from the Corrective Action Plan to the Strategic Plan

Progress Made

- Completed Actions and Outcomes
 - Tracking tools deeper dive
- Recent Metrics

Backlog Reduction Timeline

Next Steps

- Acceleration Plan: Near-term Actions and Outcomes
- Longer-term Actions and Outcomes



Background

Background

Progress
Made

Backlog
Reduction

Next Steps

Recap Audit Findings and Corrective Action Plan

- Corrective Action Plan Timeline

Transition from the Corrective Action Plan to the Strategic Plan

- Permitting Strategies

Key Points: Improvements to the permit process are being implemented with structure, accountability, and timelines.

Background

Progress
Made

Backlog
Reduction

Next Steps

Recap of Audit Findings and Corrective Action Plan

Engineering Audit

Background

Progress Made

Backlog Reduction

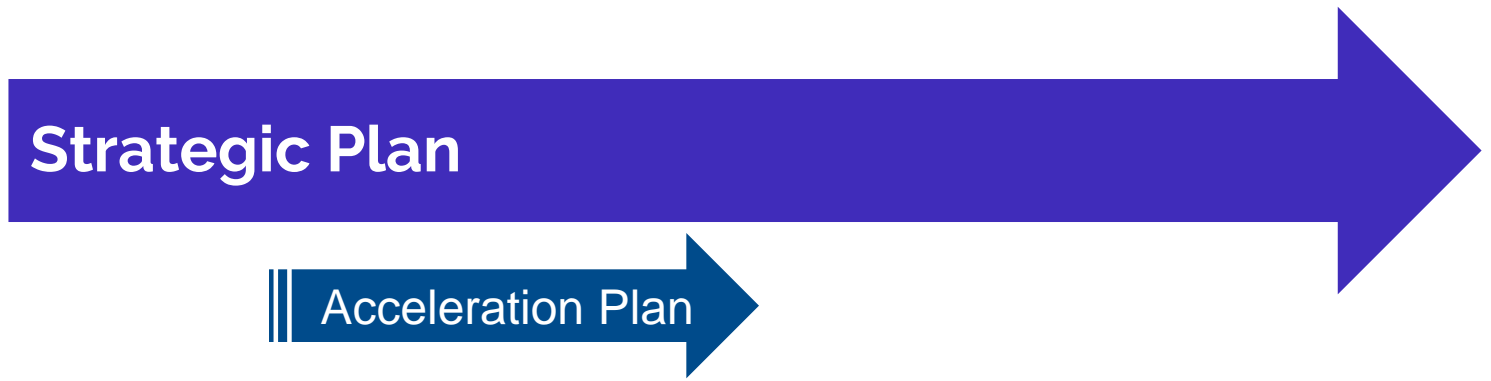
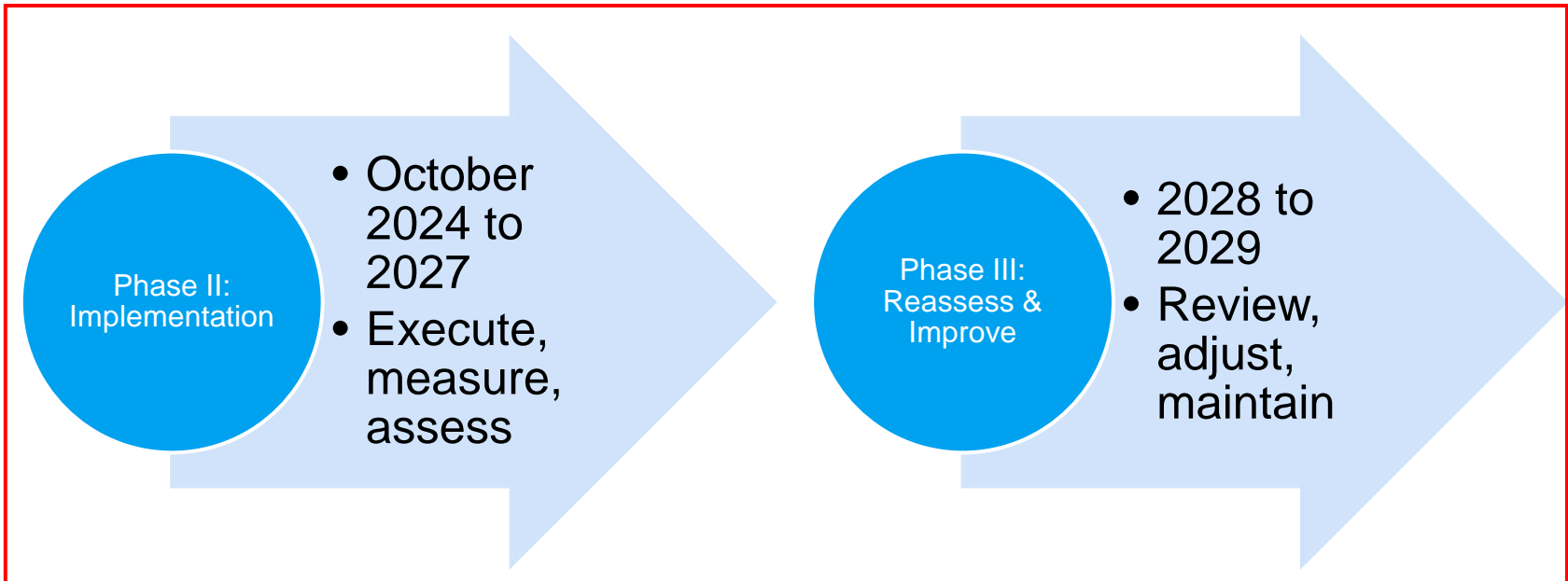
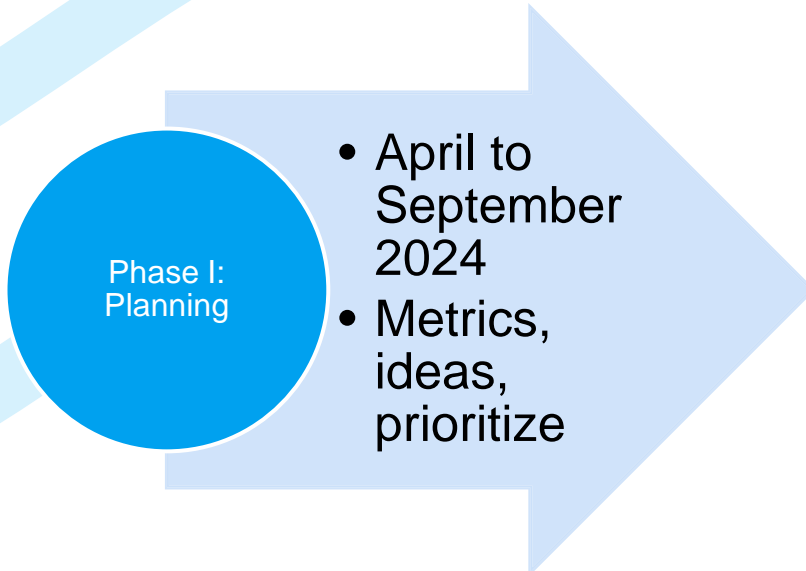
Next Steps

- On December 20, 2023, the Finance and Administration Committee (FAC) discussed the Engineering Audit Report on the Air District's Permit Process
- The Audit Report focused on the following areas: timeliness, tracking, resource management, and cost recovery

Corrective Action Plan

- In response to the Engineering Audit Report, staff developed a comprehensive corrective action plan that included 48 actions over 5 years to address the findings
- Reviewed by the FAC on April 17, 2024, and subsequently incorporated into the Strategic Plan

Corrective Action Plan Timeline



Transition to Strategic Plan

Background

Progress
Made

Backlog
Reduction

Next Steps

Engineering Audit Findings

- Timeliness/backlog
- Tracking
- Resource Management
- Cost Recovery

Strategic Plan Permitting Strategies

- Timely Permits
- Transparent Permit Process
- Consistent Permits

Goal 4: Be Effective, Accountable, and Customer-Oriented



Background

Progress
Made

Backlog
Reduction

Next Steps

Permitting Strategies

- Timely Permits – We will improve the timeliness of our permitting decisions
- Transparent Permit Process – We will improve our permitting process to be more transparent and accountable to the applicants and the public
- Consistent Permits – We will ensure Air District rules and associated air quality permits issued are clear, consistent, and enforceable so that air pollution affecting communities is minimized

Progress Made



Completed Actions

- System upgrades, staffing, policy/program
- Tracking: deeper dive

Recent Metrics

- In vs. out, applications completed, Health Risk Assessments (HRAs)

Key points: Important improvements have been instituted and metrics are showing progress. More work is needed.



Completed Actions

Background

Progress
Made

Backlog
Reduction

Next Steps

Significant Permit and Compliance System (PCS) Upgrades

- Full transition to PCS in October 2023
- Hands-on, small group training for the new system
- Online submittal option for permit applications and permit renewals
- Online payment option & removal of eCheck service fee
- System notifications for permittees
- Improved tracking and report capabilities
- Improved transparency & access to permit applications during the review period

Outcomes

Improved proficiency, efficiency, accuracy, and transparency in permit application processing

Completed Actions (cont.)

Staffing



- Created permit teams for complex facilities such as refineries and landfills
- Hired 5 highly trained permit Engineers to work on complex permit applications and permitting policy
- Hired dedicated Assembly Bill (AB) 617 Principal to help with communication with and gathering input from communities on permitting matters, allowing other senior level staff to concentrate on permitting operations
- Hired and trained HRA modelers
- Board approved for Fiscal Year 2025 - 2026:
 - Facility-funded Engineering Program Manager (EPM) positions
 - Best Available Control Technology (BACT) / Consistency Coordinator

Outcomes
Addressed some specialized staffing needs to improve permit application processing speed and remove competing demands for Permit Engineers

Completed Actions (cont.)

Background

Progress
Made

Backlog
Reduction

Next Steps

Policy/Program Updates

- Updated Permit Handbook to promote efficient and consistent permit application processing
- Policy updates for back-up engines: created short-term increase in permit applications in fall 2024 followed by more expedited application processing
- Created back-up engine backlog reduction plan
- Streamlined HRAs including backup generators

Outcomes

Promotes efficient and consistent permit application processing*

Completed Actions (cont.)

Tracking Tools



- **Additional statuses and labels**
 - "Under Evaluation With Applicant" tracks time with Air District vs. time with applicant: Improves transparency & accountability
 - Overdue reasons: Improves tracking, reporting, and identifying barriers
- **System Dashboards** – Organizes/tracks work, helps with prioritization, and alerts on deadlines
- **Internal Management Reports** – Manage workload, track progress, and identify bottlenecks
- **Corrective Action Cockpit** – Visually show overall performance of the permitting program with trends for applications and renewals

Outcomes
Improves transparency, accountability, prioritization, organization, workload management, progress tracking, and de-bottlenecking

Application Tracking – Who has it?

Background

Progress
Made

Backlog
Reduction

Next Steps

With the Applicant

- Incomplete status – application is incomplete for fees and/or information
- Complete
 - Revisions required to comply
 - Applicant wants to review permit conditions

Outcomes

- Provides clarity regarding next steps for the permit application to keep on track
- Prevents permit applications from getting stuck
- Creates accountability for Air District staff and permit applicants

With the Air District

- Completeness review upon receipt
- Evaluation (includes public notice period)
- California Environmental Quality Act (CEQA) Lead Agency Review moved to “With Applicant”

Permit Application Tracking: With Applicant

The screenshot displays the 'APPLICATION STATUS' section of a permit application tracking system. It includes a sidebar on the left with a document icon and the text 'Application Status'. The main content area shows the following details:

- Application Status:** COMPLETE - APPLICATION UNDER EVALUATION - WITH THE APPLICANT (highlighted in a yellow box)
- Next Due:** 63 Days Remaining Sep 10, 2025 (with a clock icon)
- Initial Submit Date:** 5/30/2025
- Update Application Status:** A dropdown menu with a downward arrow.
- Select a Reason:** A dropdown menu with a downward arrow, currently showing 'Applicant Reviewing Permit Condition'. This option is circled in blue, and a blue arrow points from this circle to the first bullet point in the adjacent list.
- Add Note:** A text input field.
- Next Due:** 9/10/2025 (with a calendar icon)
- UPDATE STATUS →** A teal button at the bottom right.



Reasons (must enter note and notify applicant)

- Applicant Reviewing BACT/ BACT for Toxics (TBACT) Requirements
- Applicant Reviewing HRA Requirements
- Applicant Reviewing Compliance with Regulations
- Applicant Reviewing Permit Condition
- Applicant Seeking Emission Reduction Credits
- Applicant Reviewing Application Errors and Omissions
- Applicant Reviewing Other Materials
- Awaiting Lead CEQA Agency Review

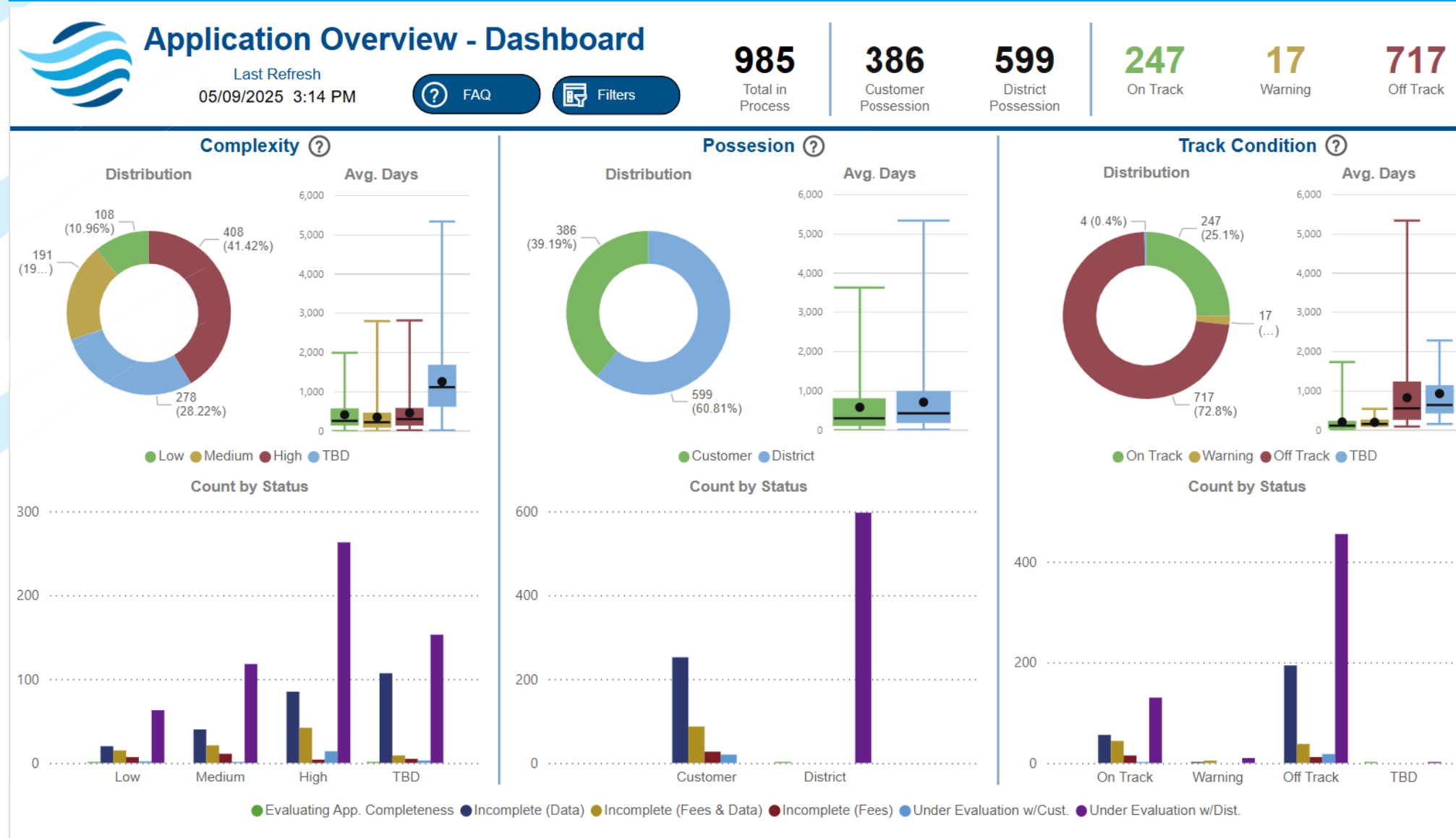
Application History and Status for the Facility



Outcomes: better transparency and accountability on permit status for applicants.

- Application status
- Visual timeline
- Time with Air District and applicant

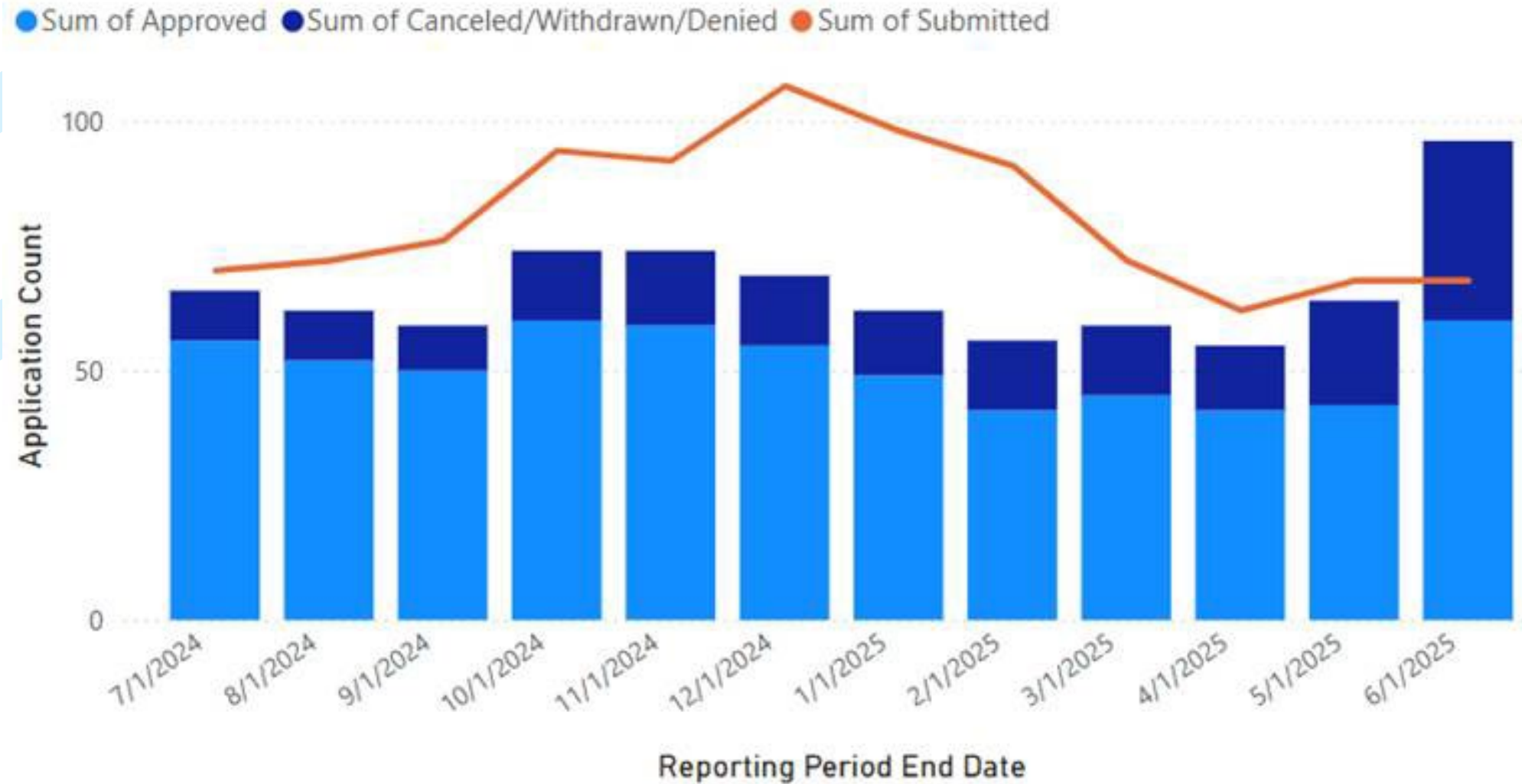
Application Dashboard



Outcomes

- Prevents applications from going off track
- Highlights applications that are off track in order to get them back on track

Recent Metrics: In vs. Out



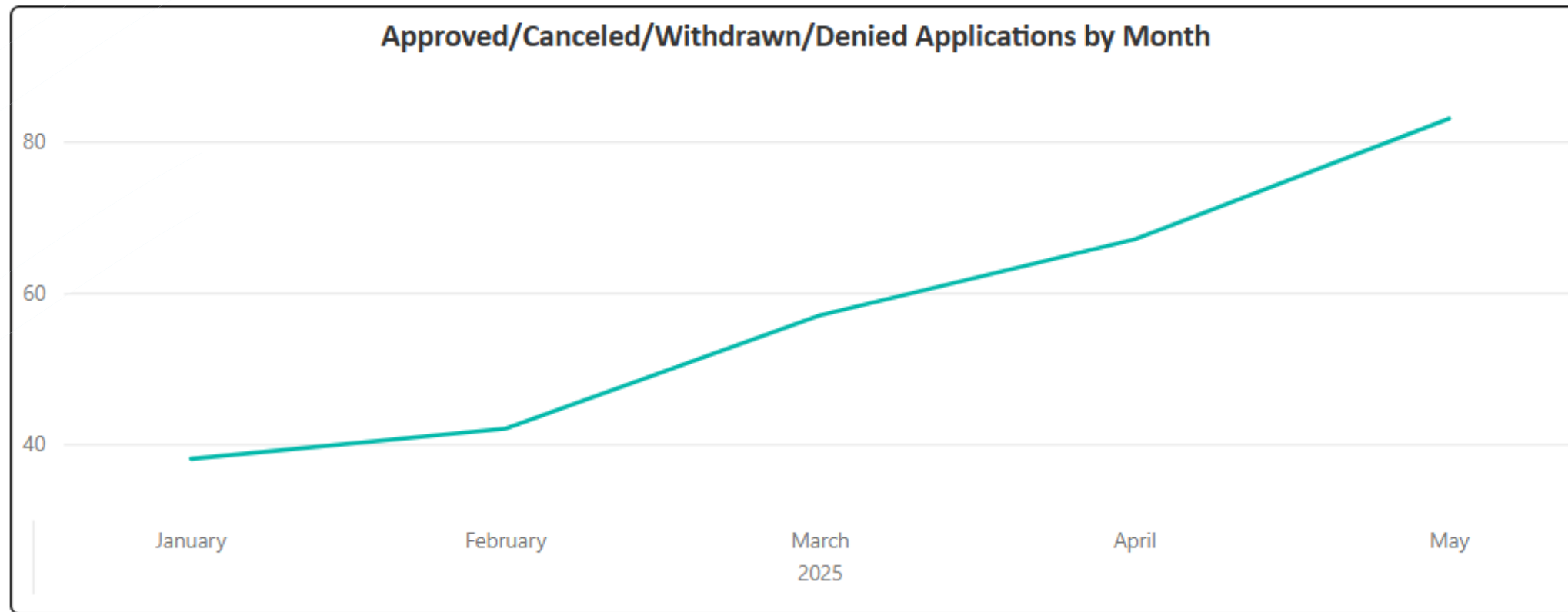
3-month rolling average

- Submitted
- Completed

Large increase in Engines

- Nov-Dec 2024

Recent Metrics: Applications Completed



Data refreshed daily - last updated: 5/26/2025 3:08:18 AM

- Start to clear applications
- Incomplete
 - Legacy
 - Outdated

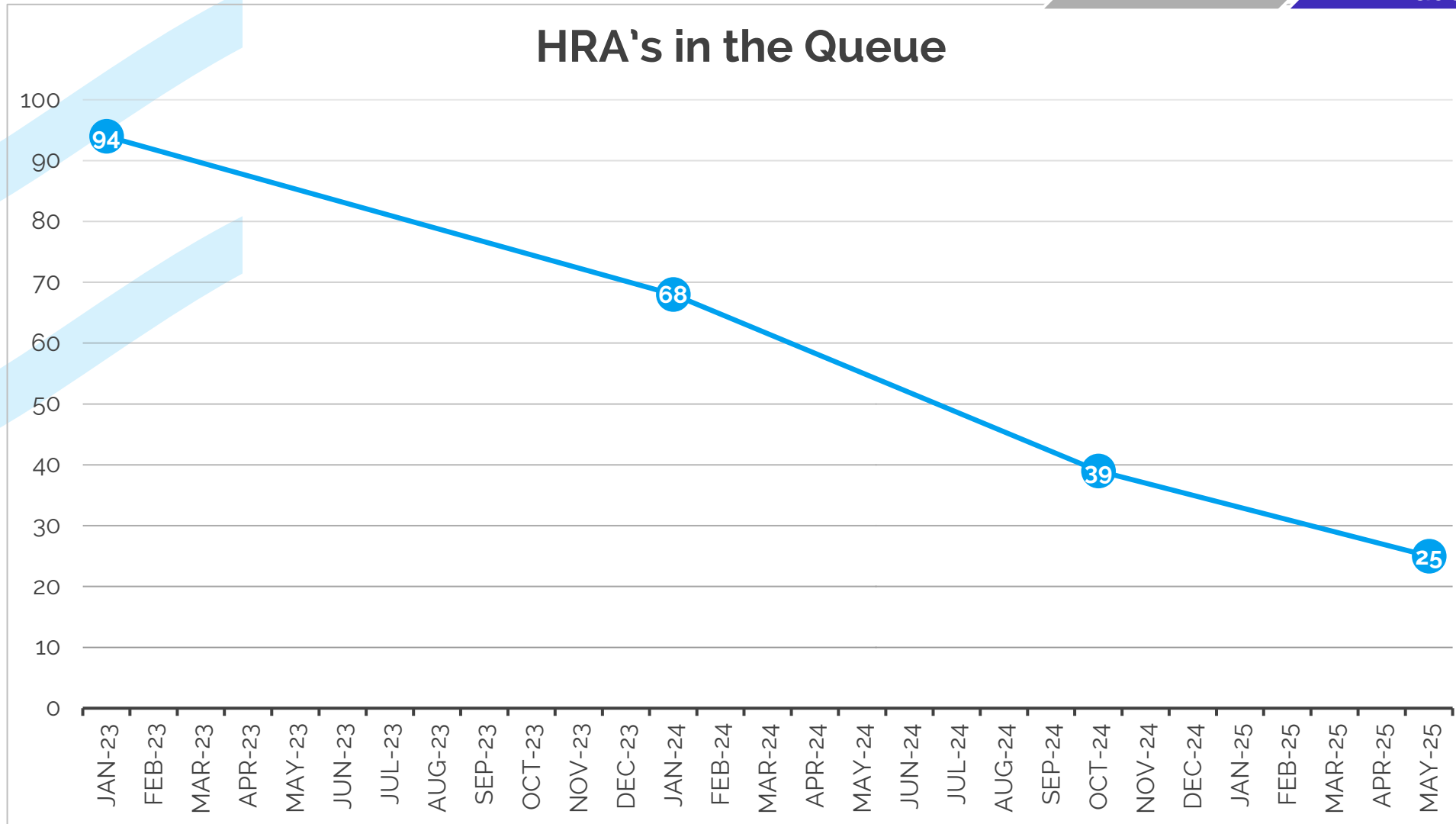
Recent Metrics: HRAs in Queue

Background

Progress Made

Backlog Reduction

Next Steps



Continuous improvement:

- Staffing
- Streamlining
- Training

Maintenance level

- In=out

Recent Metrics: Timeliness for Completed Permit Applications



New source review (NSR) application processing times	# Evaluation to Approved/Deny	% Evaluation to Approved/Deny	# Submit to Approved/Deny	% Submitted to Approved/Deny
<90 days	1874	60%	1019	33%
90 to <180 days	624	20%	725	23%
180 days to <1 year	424	14%	851	27%
1 to <2 years	135	4%	375	12%
2 to <3 years	19	1%	79	3%
3 to <4 years	10	0%	22	1%
4 to <5 years	8	0%	16	1%
5+ years	6	0%	13	0%

Since 2021, once all information is provided by the applicant...

- 60% issued in 90 days or less
- 80% issued in 180 days or less

- Evaluation to Approved/Deny means length of time since application is declared “Complete”
- Submit to Approved means length of time since application was submitted
- January 2021 to June 2025 (excludes canceled and withdrawn)

Progress Made: Take-aways

Background

Progress
Made

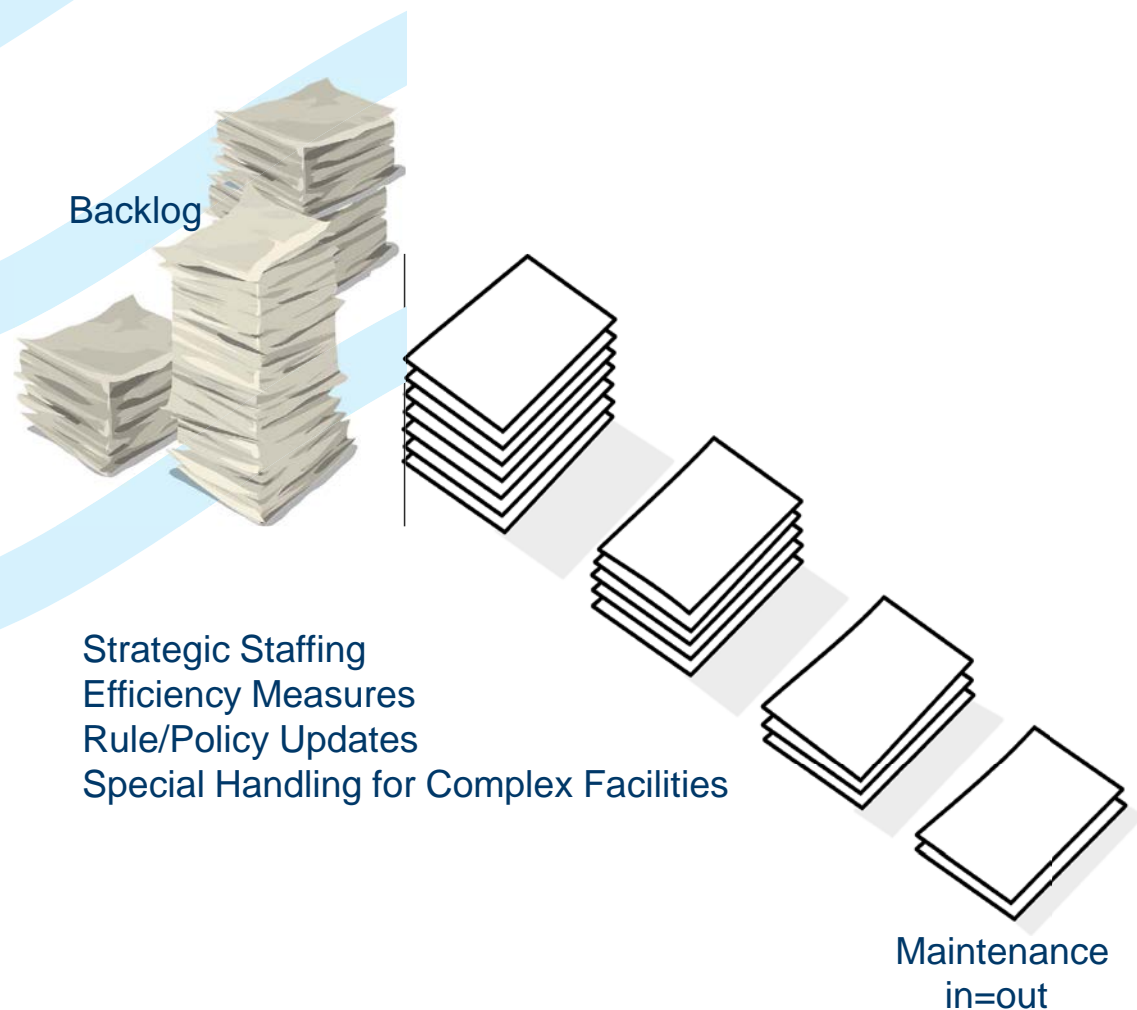
Backlog
Reduction

Next Steps

We are making progress but key sticking points for applicants exist:

1. 20% of completed permit applications take longer than 6 months for action
2. Permit applications can get stalled in the incomplete phase – 44% take longer than 6 months for action from time of submittal
 - It can take many months for the Air District to collect the information needed for a permit application to be deemed complete
3. Lack of dedicated staff to address backlogged permit applications

Backlog Reduction Timeline: Properly Resourced



Clear out legacy permit applications

- 105 applications pre-2021
- Act on all by 2027 (if not prevented by legal/policy issue)
- Tools: project management; permit streamline policies; temporary staff

Standard permit applications (e.g., engines, coatings)

- 558 active applications
- Achieve maintenance by 2027; with app > with Air District
- Tools: tracking, online applications, staffing increases

Complex permit applications

- 404 active applications
- Achieve maintenance by 2028; with app > with Air District
- Tools: EPM positions, rule/policy updates, staffing

Next Steps



Acceleration Plan: Near-term Actions

- System upgrades and tracking
- Policy/program: permit taskforce, rule/policy updates
- Staffing and Mid-year budget request

Long-term Actions

Key points: Increased resources and rule/policy updates are needed to bring about to accelerate timeliness of permit application processing.

Near-term Actions



Significant PCS Upgrades

- Add Source Test programs to PCS
- Add HRA data and metrics to PCS
- Strategize moving all renewals and applications submittals online (includes outreach and workgroups)
- Improved notification/reminders (e.g., 30-day reminder on Under Evaluation with Applicant, 10-day cancelation notice, permit expired)
- Improved tracking of Authority to Construct & Start-up

Near-term Actions (cont.)

Background

Progress
Made

Backlog
Reduction

Next Steps

Tracking Tools

- Tracking time permits are with applicants and with Air District staff
- Automated emails to applicants for applications that require attention
- Create tracking alerts for off-track permit applications requiring elevation and timely decision-making
- Expand/refine reports for better tracking
- Improved dashboards for efficient permit application tracking

Near-term Actions (cont.)

Background

Progress
Made

Backlog
Reduction

Next Steps

Policy/Program Updates

- Establish a **Permitting Taskforce** with applicants and other stakeholders
 - Support the transparent implementation of process, rule, and policy changes
 - Meet bi-monthly (minimum), to assess progress and get feedback
- Accelerate first phase of permitting rule amendments (Early 2026)
 - Focus on efficiency and clarity
 - Remove unnecessary bottlenecks and outdated language that do not provide meaningful air quality benefits
- Develop an updated permit streamlining policy
 - Provide predictable timelines for business and stable applications for efficient permit review
- Review/revise rules that require significant engineering resources
 - Revise without losing health protection
 - Examples: Regulation 12-15 emissions reporting and 11-18 process streamlining

Near-term Actions (cont.)

Background

Progress
Made

Backlog
Reduction

Next Steps

Staffing: Currently Approved

- Hiring a consistency coordinator – will bring consistency and transparency to BACT
- Hiring 2 EPMs for complex facilities
 - Webinar is planned for early August
- Contracted with an external refinery expert to assist with challenging technical issues that are causing delays in permit actions
- Aggressively back-filling vacancies – interviewing for 6 entry-level permit Engineers and 1 Principal Air Quality Engineer
- Seek assistance from retired annuitants for backlog-related work

Near-term Actions (cont.)

Background

Progress
Made

Backlog
Reduction

Next Steps

Developing a mid-year budget request for additional permitting resources for Board of Directors Consideration in early Fall 2025, including:

- **Temporary staffing** to clear the backlog:
 - Project managers to track and promote timely action on all permit applications
 - Limited-term contract employees for high-volume easy applications
 - Helpdesk technician to support expanded online application submittals

Near-term Actions (cont.)

Background

Progress
Made

Backlog
Reduction

Next Steps

Mid-year budget request for additional permitting resources for Board (cont.)

- **Additional permanent staffing** to support on-going demand for the Engineering Division
 - Entry-level Engineers to support categories such as back-up engines, landfills and compost, and material handling
 - Shift all non-refinery work away from refinery team
 - Additional staff at the supervisor level to manage the higher volume of applications we anticipate
 - Engineer position to support communication with external stakeholders
 - Improve customer relationships and transparency
 - Promote focus of permit engineers on their permit applications
- Other resources such as information technology, project management, and data analytics

Near-term Actions (cont.)

Background

Progress
Made

Backlog
Reduction

Next Steps

Mid-year budget request for additional permitting resources for Board (cont.)

Non-staff Resource Needs

- Conduct a full business process analysis to identify bottlenecks and additional efficiencies
- We issued the Request for Proposals in early July
- Consultants for efficiency analytics and project management
- On-going support for technical experts (e.g., refinery expert)
- Optimize helpdesk for online permit application submittals

Longer-term Actions



- Continuous Improvements to the PCS, including the external user experience
- Expand EPM program
- Continued rule updates, including backup engines (Rule 9-8) and remediation (Rule 8-47)
- Training
- Explore Artificial Intelligence and automation tools to expedite routine tasks

Questions & Discussion

For more information:

Pamela Leong | Director of Engineering | pleong@baaqmd.gov



Committee Assignments

Finance and Administration Committee

July 16, 2025

Dr. Philip M. Fine

Executive Officer / Air Pollution Control Officer



Air District Administrative Code

The Chairperson shall appoint members of the Board of Directors to the standing committees annually in January, or as soon thereafter as new members are named by their appointing authorities (except for the Nominating Committee, which shall be appointed as specified in Section 3.3(e)). The Chairperson may also appoint members at any time a vacancy occurs. The Chairperson shall ensure that Committee membership is rotated to provide equitable representation of cities and counties and geographical diversity to allow participation in the work of the Air District by as broad a representation as may be possible. In no event shall a committee be composed of a quorum of the Board of Directors or any committee of the Board.

(Air District Administrative Code § 3.4)

Current Process

- At the end of the year, Chairperson initiates process to assign Board members to Committees
- Air District notifies Board members and gathers interest
- Chairperson reviews interests and determines assignments
- Chairperson shares roster with Air District leadership
- Air District updates materials with new Committee assignments

Proposed Timeline

Timing	Action
Early December	Chairperson initiates process of appointing members; Air District notifies Board members to share interest
Late December	Board members submit interest
January	Chairperson reviews requests and finalizes roster of assignments*
February	Board of Directors Meeting Agenda item includes the committee assignments (informational only, on the consent calendar)

**This process could be delayed if there is a change in Chairperson*

Board of Directors Rules of Procedure

- Air District staff is proposing to clarify and memorialize this process in the Board of Directors Rules of Procedure.

Questions & Discussion

For more information:

Dr. Philip M. Fine | Executive Officer | pfine@baaqmd.gov