


**OFFICE MEMORANDUM**  
**May 14, 2021**

TO: JACK P. BROADBENT, EXECUTIVE OFFICER/APCO   
VIA: DAMIAN BREEN, DEPUTY EXECUTIVE OFFICER for - 5/15/21  
FROM: PAMELA J. LEONG, DIRECTOR – ENGINEERING DIVISION 05/14/2021 P J L  
**SUBJECT: PROPOSED PERMITTING STREAMLINING INITIATIVES**

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**Requested Action:** Due to the large number of overdue permits and limited resources, please approve the proposed permitting streamlining initiatives.

**Proposal:**

- Air District staff will reject a permit application that does not meet minimum standards for acceptance (project description, correct forms, public and confidential copy of the application).
- If an application is incomplete, the applicant has 60 days to submit incomplete information or application will be canceled unless the applicant requests a 90-day extension in writing and the request is approved by the Air District. Per regulation 2-1-309, the applicant has 90 days to furnish the information and pay all fees. (The standard incomplete letter allows for 60 days, which is required for some of the more complicated applications.)
- Unless changes are specifically authorized by Air District staff for the project to achieve compliance, the applicant may not make changes to an application deemed complete for the following:
  - Proposed Emissions and/or Emissions factors
  - Project or process design (including throughput and capacities)
  - Proposed Abatement equipment
  - Scope of the project

Any changes deemed significant by the Air District will require resubmittal of a new permit application and restarting the application clock.

- If Air District staff identifies potential revisions for the project to achieve compliance, the applicant shall have two weeks (up to a maximum of 30 days if recommended project changes require engineering design or other approvals) to provide a compliant option. Otherwise, the application will be denied. The applicant may also withdraw the application and reapply once they have identified project modifications required for permitting.
- If the applicant wishes to review the permit conditions prior to permit issuance, the applicant must request it in writing and allow a four-week extension of the application due date. Once the Air District provides permit conditions to a facility, the facility will have two weeks to review these conditions and respond to staff. In the event the facility does not respond, staff will issue the A/C.

After the facility responds with comments, staff will have two weeks to consider comments before either incorporating facility amendments or issuing the AC or PO with the original proposed conditions.

- In unusual circumstances where the permit conditions are unique or complicated, an additional cycle of permit conditions review can be approved by the manager but will need to be completed within another four weeks (two weeks for the applicant and two weeks for the Air District to finalize conditions). The applicant must allow a four-week extension of the due date in writing.
- If an Authority to Construct is issued, the owner/operator may only request revisions to the permit conditions to update equipment installation details (fugitive counts, serial numbers, etc.), and items specifically identified by start-up conditions. (The APCO may use their discretion.)