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AIR QUALITY  
MANAGEMENT  
DISTRICT

# How Do I Expedite My Application?

BACWA AIR Committee Meeting

February 26, 2014

BAAQMD Office 10:00 – 1:00

Greg Stone, Supervising Air Quality Engineer



# Introduction

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*“What can applicants do to expedite the permit review process?”*

Summary of Permit Application Review

Regulatory Timelines

What can applicants do to expedite?  
(Group Discussion)



# Permit Process

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## Main Steps to Issuing a Permit:

- Completeness Determination
- Evaluation
- Issue Authority to Construct
- Equipment Installation & Startup Notification
- Issue Permit to Operate



# Completeness Determination

Review application for:

- Data Forms
- Other Information
- Fees

*Incomplete* - Send Fee Invoice and/or Incomplete Data letter

*Complete* - Send Completeness letter

Incompleteness Timeframes (Reg. 2-1-432):

- District
  - 15 Working Days – Most Applications
  - 30 Days – PSD/Public Notice (2-2-405)
- Applicant
  - Fees – 30 days
  - Info – 60 days; with extensions, between 90 to 180 days total





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# Completeness Determination Checklist

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## BAAQMD Application (P-101B) and Data Forms

### Additional Information:

- Source Specific info
- Emissions
- Toxics (i.e., HRSA form, Reg. 2-5)
- Rule Applicability/Compliance
- School Notification (2-1-412)
- Accelerated Permit (2-1-106)
- BACT (2-2-301)
- Offsets (2-2-302)
- PSD (2-2-304)
- CEQA (2-1-426)



Fees (Reg. 3 - filing, initial, HRSA, permit, toxic & back fees)

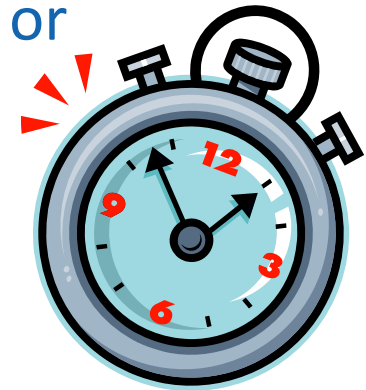


# Evaluation Timeframes

Once an application is *Complete*, how long to issue the permit?

## Most Applications (2-1-408)

- 35 Working Days following completeness date, or
- 30 Days after Final EIR or Negative Declaration.



## PSD/Public Comment Applications

- Preliminary Decision (2-2-404)
  - 90 Days following completeness date.
- Final Action (2-2-407)
  - 180 Days following completeness date, or
  - 30 Days after Final EIR or Negative Declaration.\*



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# Engineering Evaluation Report

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## Engineering Evaluation Report for each application, including:

Background discussion

Emission calculations

- Criteria pollutants and toxic compounds
- Health Risk Screening Assessment (if applicable)

Compliance Determination

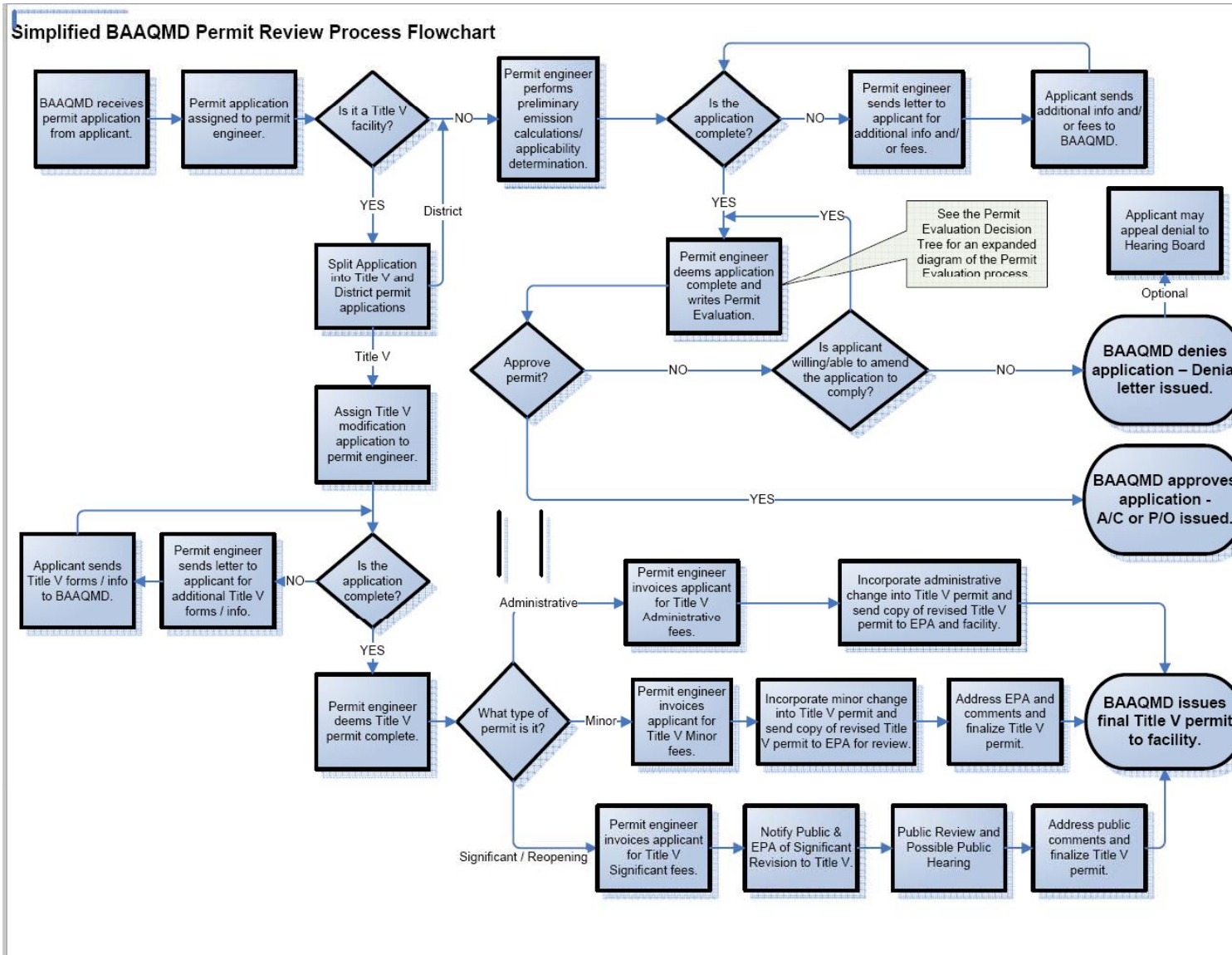
- New Source Review - Best Available Control Technology & Offsets
- District, State and Federal rules

Permit Conditions

Final Recommendation



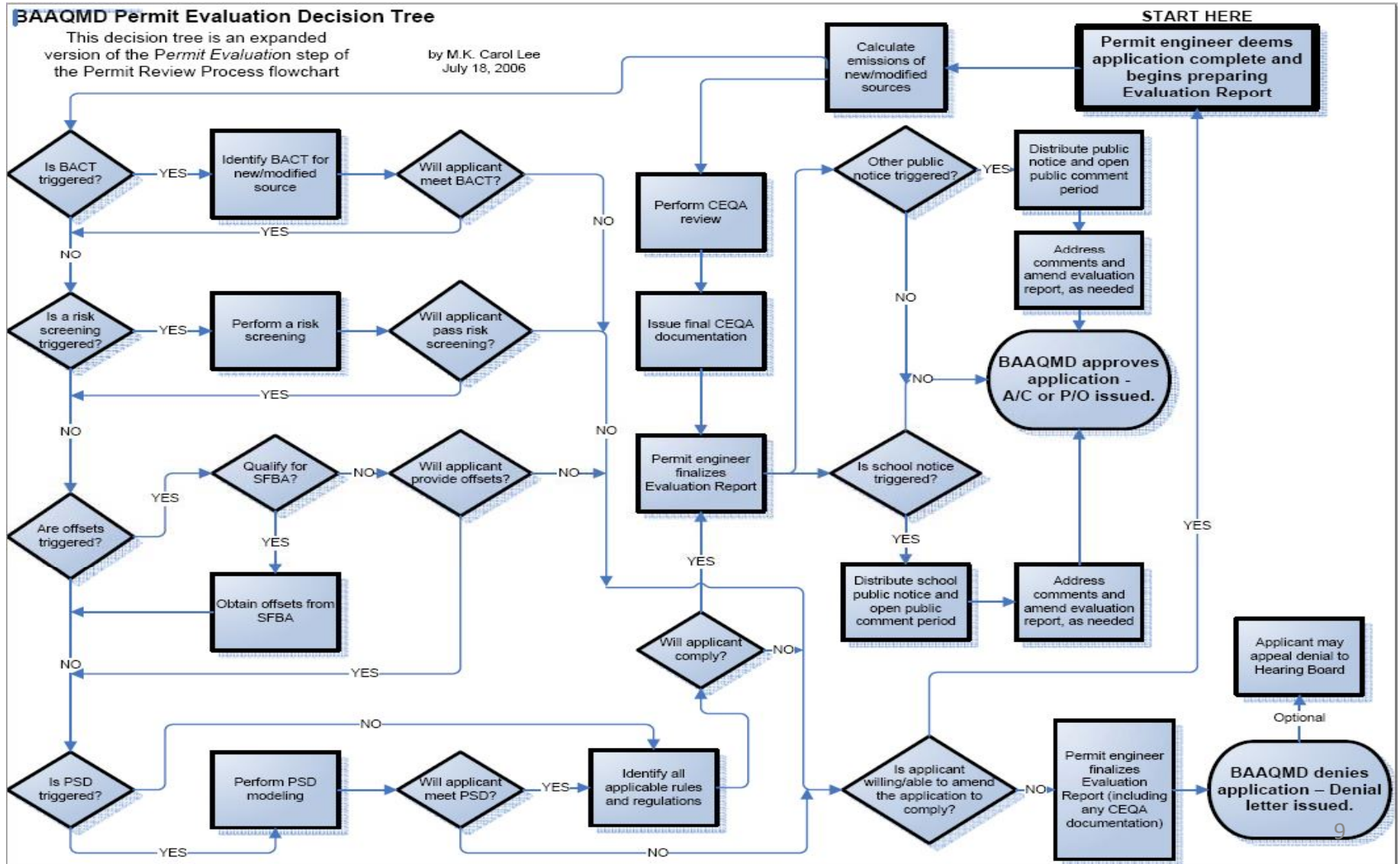
# Permit Review Flowchart







# Permit Evaluation Flowchart





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## What can you do to expedite?

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Submit a *Complete* application

Provide a cover letter describing project

Include emission data whenever possible

Respond to questions / pay fees quickly

Apply early



# What can you do to expedite? (continued)

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Minimize back-and-forth discussion

Meet with Permit Engineer / Supervisor

Help us prioritize

Understand rule requirements

NSR – if a new or modified source can emit more than 10 lb/day and has *any* increase, BACT is triggered.



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# Helpful Tools for Evaluations

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[WWW.BAAQMD.GOV](http://WWW.BAAQMD.GOV)

Permit Handbook

- Sample evaluations
- Emission calculations
- Permit conditions

BACT / TBACT Workbook





# Helpful Tools for Evaluations

The screenshot shows the Bay Area Air Quality Management District website. At the top left is the logo and name. A navigation bar includes links for About, Divisions, Help, and RSS. The main banner features a cyclist with the text "Clean Air Healthy Life" and three buttons for "Community", "Business" (highlighted), and "Science". Below the banner is a utility bar with icons for "Be Informed", "View Status", "Download", and "Submit Request". A secondary navigation bar lists "COMMUNITY", "BUSINESS", and "SCIENCE". The "Work" section is titled "Air Quality for Business" and contains two main content areas: "Apply for Permits" and "Stay in Compliance".

**Apply for Permits**

View air quality permit application directions, forms, policies and more. Air quality permits are required by state and federal law as a part of doing business in the region. The Air District's rules and regulations cover both large and small businesses.

- [Air Quality Permits](#)
- [Authority to Construct Permit to Operate](#)
- [Permit Application Forms](#)
- [Permit Renewal Forms](#)
- [Title V Permit Programs](#)
- [Title V and Synthetic Minor Forms](#)
- [Engine Permits](#)
- [Air Toxics New Source Review](#)
- [Stand-Alone Gasoline Service Station](#)

**Stay in Compliance**

Keep up with the most current information on Air District regulations, air quality permits, compliance requirements, and inspection activities.

- [Rules & Regulations](#)
- [Compliance Assistance](#)
- [Compliance Advisories](#)
- [Compliance Tips and FAQs](#)
- [Air Toxics Programs and Rules](#)
- [Inspections](#)
- [Gas Station Vapor Recovery - State Upgrade Required](#)
- [Open Burning Status](#)
- [CEQA Guidelines](#)
- [Application Public Notices](#)
- [Regulatory Public Hearings](#)
- [Hearing Board's Final Orders / Decisions](#)

**Utility Buttons**

Wood Burning Status  
Monday, 2/24  
No Spare the Air Alert in Effect  
winter spare the air  
Air Quality Widgets | BAAQMD

Participate



# Helpful Tools for Evaluations

The screenshot shows the website's navigation menu with 'COMMUNITY', 'BUSINESS', and 'SCIENCE' options. The main content area is titled 'Authority to Construct / Permit to Operate' and includes a detailed paragraph about the permit process. A sidebar on the left lists various resources, with 'BACT TBACT Workbook' and 'Permit Handbook' highlighted in yellow. On the right, there are utility buttons for 'Wood Burning Status' (showing 'Monday, 2/24' and 'No Spare the Air Alert in Effect'), a 'winter spare the air' button, and a 'Participate' section for the 'airing ideas' public participation plan. A 'BAAQMD Webcasts' button is also visible at the bottom right of the sidebar area.

**Authority to Construct / Permit to Operate**

Any person or facility that puts in place, builds, erects, installs, modifies, modernizes, alters or replaces any article, machine, equipment or other contrivance, the use of which may cause, reduce or control the emission of air contaminants, shall first secure written authorization from the District in the form of an Authority to Construct, unless the source is specifically excluded or exempt from permit requirements. The District's permit process is a pre-construction review and approval process. The District's review is conducted after the equipment is designed, but before it is installed. This is because it is less costly and more efficient to fix a non-complying design than to retrofit or replace non-complying equipment that has already been installed. The pre-construction review for new and modified sources applies to both stationary and portable sources of emissions that do not qualify for a permit exemption.

Last Updated: 1/9/2013

**Utility Buttons**

Wood Burning Status  
Monday, 2/24  
No Spare the Air Alert in Effect  
winter spare the air  
Air Quality Widgets | BAAQMD

**Participate**

airing ideas  
PUBLIC PARTICIPATION PLAN

BAAQMD Webcasts





# Title V Renewals

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## New Title V Renewal Application Procedure

18 months before Renewal Application is due, BAAQMD sends to you:

- Last Title V Permit
- All Engineering Evaluation Reports for NSR applications issued since
- Applicable forms

We request you update the Title V Permit and submit revisions electronically:

- Applicable requirements
- Monitoring requirements
- Permit conditions

Allows for early dialogue and potential resolution of permitting issues prior to submittal of the Renewal Application



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# Any Questions?

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# Updating Emissions

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***How do I update my facility's  
emissions in the BAAQMD  
Emission Inventory?***



# Updating Emissions

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In general, work with your Permit Engineer to update any facility data.

Some changes may be easy.

Others may require us to change your permit or conditions.



# Updating Emissions

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What kind of emissions do you want to update?

How do you calculate your emissions?

What would you like to see us do?