

Oregon DEQ Permit Backlog Improvement Project/NACAA Permit Clearinghouse

NACAA Joint Permitting and Enforcement Workshop

February 25-26, 2020

St. Louis at the Arch

Background

- In 2017, Secretary of State (SOS) audited DEQ's AQ permitting program.
- Report No. 2018-01: DEQ should improve the AQ permitting process to reduce its backlog and better safeguard Oregon's air.
 - <https://sos.oregon.gov/audits/documents/2018-01.pdf>
- SOS auditors made 10 recommendations in 2018 and conducted follow-up investigations in 1Q 2019.
- Report No.2019-18: Recommendation follow-up report:
<http://records.sos.state.or.us/ORSOSWebDrawer/RecordView/6694888>

ODEQ Air Permit SOS Audit

- Legislative support
 - Budget approved for 6 positions in ACDP and 2 in Title V during the 2019 legislative session; 5 ACDP and 2 TV positions are eligible to start July 1, 2020; the last one can start after April 1, 2021.

News

By [KTVZ News Team](#)

Published [January 3, 2018](#) 2:08 pm

State audit targets DEQ's air quality permit backlog

(Update: DEQ issues responding statement)

Secretary of State Dennis Richardson released an audit Wednesday of the Oregon Department of Environmental Quality's Air Quality Permitting Program, finding a "significant" processing backlog that needs addressing.

Here's his news release on the audit:

Air quality permits regulate the types and amounts of air pollution businesses are allowed to emit based on federal and state pollution limits. The audit found a significant backlog in air quality permits. Untimely permits, combined with a current backlog of inspections, endanger the health of Oregonians and the state's environment. DEQ should evaluate staffing and workloads among air quality permit writers and provide better guidance to both staff and businesses.

The findings are outlined in the audit report entitled: "[DEQ Should Improve the Air Quality Permitting Process to Reduce Its Permit Backlog and Better Safeguard Oregon's Air.](#)"

Recommendation Implementation Status: Implemented/Resolved


No	Recommendation
7	<p>HQ needs to provide consistent guidance and support to permit writers through the use of tools and resources, including:</p> <ul style="list-style-type: none">a. Current and ongoing guidance on new rule interpretation and implementation;b. Checklists to help determine application completeness;c. Documentation of up-to-date permit writing policies, procedures, and processes stored in a centralized and accessible location
8	<p>DEQ needs to improve the pre-application process to help make sure the right information is submitted to help reduce delays.</p>
10	<p>DEQ needs to provide clear information to the public on the purpose of public comment and participation</p>

Working with NACAA on Backlog Reduction

- NACAA permitting success stories webinar on 6/24/2019
 - 5 State and Local AQ agencies
 - Iowa Department of Natural Resources' success story: Backlog team for 6 -9 months working on 600 backlog projects
- NACAA Permitting Resources Clearinghouse:
 - <https://nacaapermitproject.wixsite.com/pproject>




TOOLS FOR EFFECTIVE AIR PERMITTING

Training Materials and Tools for Permit Writers and Inspectors 

Facilitating Timely Permit Applications 

Effective Public Participation 

Online Resources 

This is a “catch-all” category with examples of agency webpages containing permit application materials (including general permits) and Clean Air Act permitting guidance directed at the general public.



Permit Application Forms



Guidance and Technical Support Materials

TRAINING MATERIALS FOR PERMIT WRITERS

Substantive materials that can be used in training new permit writers or that have proved helpful to them.

Survey

Training

Timely Applications

Public Participation

Online Resources

<input type="text" value="Search"/>			
Agency ↕	Title ↕	Date ↕	Description ↕
California	California Air Resources Board 2019 Training Course List	N/A	CARB's training program is designed to offer the most up-to-date information on air pollution topics. These classes would be valuable to new and veteran permitting, compliance and rulemaking staff alike, in addition to providing outreach and compliance assistance to regulated sources and industries. Includes programs on NSR and Title V permitting, inspections, and much more.
Iowa	Effective Permit Writing: The Basics	2017	PowerPoint slides used in a training workshop for new staff on effective permit writing; can also be used as a refresher for existing staff.
Iowa	Top 10 Permitting Efficiency Tips	N/A	A handout with tips from a senior engineer on ways for a permit writer to become more efficient.
Nebraska	Helpful References and Their Links	1/1/2015	A document for new permit writers containing helpful references (and their links) that will be used frequently (eCFR, Emission Factors, Federal Register, Secretary of State Name Search, NESHAP/NSPS, SIP Info, Performance Testing, etc.).
Nebraska	Operating Permit Practices and some of the easily forgotten little	8/27/2015	An SOP for permit writers, to be used while drafting the permit. Helps new staff understand the general framework of the permit development process.

Current Status of Permit Backlog

	July 2017	December 2019	% Improvement
Title V	44.0 %	36.5%	7.5%
ACDP	42.3 %	20.0 %	22.3%

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Oregon DEQ improves expired air quality permit backlog, but there's more to do

TRACY LOEW | SALEM STATESMAN JOURNAL |
6:46 pm EDT May 1, 2019



Questions?