San Joaquin Valley
Unified Air Pollution Control District

Expedited Permit Processing for INSPECT Deficiencies

Approved By: _______________ Signed________________    Date: ___4/7/98____
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Director of Permit Services

Purpose

The purpose of this policy is to provide expedited permit processing for actions taken to correct deficiencies found by INSPECT program partners during self-inspections.

Background

The District’s voluntary INSPECT program is designed to improve compliance with District Rules and Regulations by encouraging facility operators to routinely perform self-inspections. INSPECT program partners agree to develop inspection forms for each permitted operation, inspect their operations at established frequencies, and maintain self-inspection records. In addition to receiving expert assistance from District compliance division staff in developing effective self-inspection programs, in recognition of their efforts, INSPECT partners also receive reductions in penalties for certain types of violations. During self-inspections, facility operators may identify deficiencies that require permitting actions to correct. As an additional incentive to active participation in the INSPECT program, this policy provides expedited processing for permitting actions taken to correct deficiencies identified by participants in the program.

I. Applicability

This policy applies to permitting actions taken by INSPECT partners to correct deficiencies identified during self-inspection. In order to be eligible for expedited processing under this policy, the applicant must have been admitted to the District INSPECT program prior to the time that the deficiency was found, and have inspection records documenting that the deficiency was identified during self inspection. Permitting actions taken to correct these deficiencies may include Authority to Construct (ATC) new units, Authority to Construct modifications of existing units, and Certification of Conformity with the procedural requirements of 40 CFR part 70.
II. Priority Processing

All applications for permitting actions taken solely to correct INSPECT deficiencies are to receive high priority status. Based on this status, ATC applications for modified emission units and functionally identical replacements shall be issued within 30 days of receipt of a complete application, unless public notice requirements are triggered.

III. Application Procedure

Applicants requesting expedited processing for actions taken to correct INSPECT deficiencies should submit a written request for expedited processing along with the complete application. In order to be eligible for high priority status, the request should indicate that the application is being submitted as part of efforts to correct a problem that was found during self-inspection. Self-inspection records need not be submitted with the application, but should be available for review upon request.

Upon receiving a request for expedited processing, the Regional Permit Services Manager will forward a copy of the request to the Regional Compliance Manager for review. The Compliance Manager will verify that the deficiency reported is consistent with the self-inspection procedures established for the facility, and follow-up with the appropriate action for a deficiency reported by an INSPECT program partner.