


San Joaquin Valley Unified Air Pollution Control District

District Policy ADM 1220

Application Review Procedure for CAPP Projects

Approved By: 
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I. Purpose:

To establish standardized application review procedure for projects evaluated by Certified Air Permitting Professionals (CAPP).

II. Objectives:

- A. Ensure uniform review process flow of CAPP projects.
- B. Define criteria for evaluating the performance of individuals certified under the CAPP program.
- C. Track performance of individuals certified under the CAPP program for specific projects using CAPP Project Review Checklist.

III. CAPP Project Review Checklist:

The CAPP Project Review Checklist, attached at the end of this policy, is used to rate and track the performance of CAPP project submittals from each CAPP.

IV. Procedure for CAPP Application Review Process:

1. Once OPS staff logs the project into PAS, the Supervising Air Quality Engineer (AQE) will assign the CAPP application to a staff Air Quality Engineer for preliminary review. The staff engineer is responsible for logging the ATC(s) into PAS, submitting an RMR/AAQA Request (if required), submitting a CEQA request, and for determining if the application is complete. Upon making the complete/incomplete determination, staff will send completeness or incompleteness letter to the applicant.

After the project is deemed complete, the CAPP project is assigned to staff AQE for reviewing the content of the application review (including checks on all emission calculations), inserting RMR/AAQA results and CEQA language into the application review, updating the Permit Administration System (PAS) database, updating emission profile records, and drafting permit conditions in PAS.

2. Staff AQE corrects any errors in the evaluation by marking up errors with corrections, replacing the pages in error, and/or reprinting the revised evaluation after corrections. Staff AQE must obtain written confirmation of amended project proposal from the applicant if the proposal is significantly altered.
3. Supervising AQE reviews the prescreened projects using the [CAPP Project Review Checklist](#) to rate the performance of the CAPP. The checklist is used to document if any significant or minor errors existed in the application review.

Examples of significant errors include, but are not limited to:

- Submission of incomplete application package;
- Errors in NSR calculations (including SB288 Major Modification and Federal Modification calculations) leading to incorrect final determinations of BACT, offset, and public notice requirements;
- Gross misinterpretation of applicable Rules & Regulations;
- Errors in application of sound engineering principles;
- Gross deviation from approved application review format;
- Incomplete equipment description (lacking identification of major permit components) and conditions which are not practically enforceable;
- Intentional fraud.

Examples of minor errors include, but are not limited to:

- Errors in numerical calculations;
- Typographical and grammatical errors;
- Minor misinterpretations of applicable Rules & Regulations;
- Minor deviation from approved application review format;
- Incorrect determination of permit unit boundary.

Scoring Key: **P = Perfect**
 M = Minor error
 S = Significant error

5. Supervising AQE submits the projects and the complete CAPP Project Review Checklist to the Regional Manager for review. If the application prepared by the CAPP contains significant errors, the Supervising AQE will obtain further guidance from the Regional Manager & Director of Permit Services for possible actions (e.g., disqualification).

6. If the CAPP is suspected of knowingly or negligently submitting false information in connection with the permit action, obtain further guidance from the Regional Manager & the Director of Permit Services for possible actions (e.g., permanent disqualification.)
7. A CAPP-prepared application with significant errors is expected to be a rare occurrence. However, upon consultation with the Regional Manager and Director of Permit Services, if significant errors are found, the Supervising AQE will draft a letter to the CAPP discussing any significant errors. Since this is expected to be a rare situation, the content and format of this feedback letter will be established on a case-by-case basis.
8. Finally, the Supervising AQE will send an email of the CAPP Review Checklist, the feedback letter (item #7 above), and the pages of application review containing significant errors together, to the CAPP Coordinator (CAPP@valleyair.org) for inclusion in the file that is used to document the performance of each CAPP. Minor errors not affecting the approvability of the project do not need to be included in the packet.

Facility #: _____

Project #: _____

Certified Professional: _____

CAPP PROJECT REVIEW CHECKLIST

Reviewing Engineer _____

Date _____

Supervisor Approval _____

Date _____

P = Perfect

M = Minor Error

S = Significant Error

* Attach examples of significant errors if necessary.

_____ Submission of complete application (if incomplete, a "Significant error)

_____ Use of correct Application Review format (per District policy GPG-5)

_____ Correct identification of permit unit boundary

_____ Emission calculations, including selecting & referencing emission factors, other than the specific categories of NSR calculations listed as follows.

_____ BACT _____ Offsets _____ Public Notice

_____ Quality of draft Authorities to Construct (major components in equipment description, with all necessary and practically enforceable permit conditions)

_____ Identification of all potentially applicable Rules & Regulations, and complete, error-free compliance discussion with the Rules & Regulations

_____ Application of sound engineering principles in technical discussions (e.g. control equipment sizing & selection, etc.)

If applicable, list any other significant errors or problems below:

_____ **Overall quality of the Application Review**