

Permitting Assignment Procedures

Background:

The Cleveland Division of Air Quality (CDAQ) is responsible for establishing compliance for more than 5,500 facilities throughout Cuyahoga County. The staff members of CDAQ's Engineering Section are charged with developing a variety of State and Federal permits for these facilities. In order to develop these permits in an effective manner, it is important to balance the permitting workload of each staff member in the section. Balancing this workload is one of the responsibilities of the Chief of Engineering. These procedures outline the factors considered by the Chief of Engineering when establishing the general permitting workload and when assigning new permitting assignments in specific.

Existing Facilities:

A first step used by CDAQ to balance the workload of existing facilities is the equalization of assignments based on an overall facility weighting factor. CDAQ has combined many data sources to develop an extensive master data base of facility and emissions unit information for its regulated facilities. This data base contains information regarding the size and complexity of each facility. Such facility level information includes the type of permitting (Title V, synthetic minor or FESOP, state permitting, and federal rule applicability). A query of this data base uses these and other factors to compile a "complexity score" for each facility. This complexity score assigns the following weighting factors to each facility:

Title	Weighting Factor
Mega Site	3
Major Source	1
Synthetic Minor Source	1
FESOP Source	1
Portable Source	1

These weighting factors are added together and the sum is multiplied by the number of emissions units at the facility. This result is the overall facility weighting factor. These weighting factors are added together to produce a composite score for each engineering section staff member. Assignments of existing facilities may be revised to equalize the composite scores between staff members.

New Assignments:

In addition to the objective data base-driven weighting factors, new permitting assignments are assigned based on a variety of criteria. These are not easily quantifiable and may, from time to time, contradict each other. Some of these less tangible factors include the following:

- Staff member's availability during the anticipated "active times" during the

- development of the permit;
- Staff member's other permitting assignments and other time commitments (including leave);
- Staff member's experience with a given permit type (or lack thereof);
- Staff member's experience with a given facility (or lack thereof);
- Staff member's experience with a given operation (or lack thereof);
- Staff member's level of interest in a given permit type, facility, and/or operation (or lack thereof);
- Staff members level of overall permitting experience;
- Likelihood that a permitting assignment might present an opportunity for professional growth to a given staff member;
- Feedback/input from permitting staff;
- Feedback/input from Permit Review Manager;
- Feedback/input from CDAQ management;
- Request by permittee;
- Level of urgency for permit timeliness (Rush List?);
- Priority information provided by Ohio EPA Central Office and/or US EPA; and
- The "mix" of permitting assignments for a given staff member.

Ultimately, the permit must be assigned for completion in as timely a manner as possible. Because permit assignments are reactionary in nature, the amount of planning and equalization that can take place must always accommodate the universe of permitting assignment. *Someone* will be assigned responsibility for each permit.