



Permitting Workgroup Issue Identification

Issue	Combine	Issue	Recommendation/Proposed Solution	Implementation Status	% Complete	Follow-Up Assignment	Timeline	Quantification
P1		Currently, there is a duplicative data double entry problem at One Stop resulting from the necessity of entering data into both EMS and Permits Plus	None – should be resolved through conversion to ACCELA.	Work on Accela has stalled due to IT resources, but will pick back up in Jan. 2013. ~50% of the development has been completed.	40%	L. Swann	Jan 2014	
P2		Applicants want multiple mailing options for different aspects of their interaction with the department – that need is not being met by the current system.	Create multiple mailing options (boxes) on permit application to provide at least two contacts. Specify type of contact.	Form has been developed and posted online for multiple options. Application forms need to be changed.	80%	W. Sterusky	Oct 2013	
P3	P90 P111	If an applicant mails an application to the department, the applicant does not get an acknowledgement of receipt from the department.	Issue a letter confirming receipt of an application that has been mailed-in. EMS has the capability to generate acknowledgment electronically (as in Complaints).	A system generated e-mail is now sent out with TV, General, and NTV permit applications.	100%	T. Martin R. Sumner		
				IT is working on requests for system generated responses for Dust, subcontractor, and asbestos notifications. IT request # 1422 and #1707.	85% Dust completed	L. Swann	IT start 21 Dec. 2011	



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P4	P31	Transfer of documents from the One Stop Shop to the Central Ave facility may result in added delay of processing of easy to issue permits and poses the potential for loss of documents.	Define Courier duties	Duties defined and rotating schedule established with staff and EnvSvcs	100%	C. Durrant	March 2011	
P5	P32	At the end of the review process a dust control plan may need correction. If corrections are not received the permit goes into a hold while attempts to contact with the applicant are made. There is no defined end point to terminate a review following an extended period of no response. In NTV permits, the dust control plan must be submitted together with the application.	Revise policy on handling recalcitrant applicants to expand on ways to obtain information required to issue a permit. Revise completed application check list.	Policy revised and implemented	100%	T. Martin		
P6		Applicants are not aware of the status of submitted plans/plans are not tracked adequately to know where they are in the queue.	Have plans tracked in EMS.	IT request submitted for changes to EMS	100%	H. Krautter		
			SOP for review of all plans that outlines responsibility.	SOP submitted for signature	100%			
P7		Some inconvenience is experienced by individuals who must go to the One Stop Shop for service. Other organizations have the option of the One Stop Shop and their office location.	Allow permits to be received at 1001 N Central and provide a cashier capability.	Proposal sent to Joy Rich. Draft service agreement with ES. 1 July 2012 will be able to accept training and records payments at Central through EnvSvcs. IT request #12931 to modify P+	100%	Leadership Team	Completed 28 March 2013	



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P8		Should every instance of a no permit violation result in a notice of violation vs. a notice to comply? There are instances where a facility has attempted to identify			UNK	Moved to compliance issue C32.		
P9		Outreach Program-MACT, NESHAP, NSPS. Insufficient effort to reach customers to notify them of their most "recent" obligation due to the promulgation of a new MACT standard	Create policy that clearly outlines division and individual responsibilities	Work is being done on training presentations and policy.	90%	E. Funderburk C. Dale		
P10		Permits are listed by different names between the two current databases; we need to have the name listed as the legal name be the same everywhere for easier searches and verification of the correct permit. It would also help if we were able to identify the date that the owner started/took possession of the business.	Document business rules so naming remains consistent.	Awaiting review	90%	C. Blagowsky		
P11		Issuance of a permit can result in the requirement to conduct a performance test within a specified timeframe (often within 60 days of permit issuance).	Short term: include a checkbox on the weekly permit review list indicating source test is required. Performance test will track from that point.	Short term is done.	100%	T. Martin		
			Long term: Automate in database. Interim: Develop spreadsheet to track performance test requirements.	Long term: awaiting IT resources for EMS changes and Accela implementation.	60%	L. Swann R. Sumner	Dec. 2013	
P12	P26 P72	The internal staff distribution list for internal peer review of a draft permit may not include the right people.	List of draft permits is sent out to specific list of employees every week. Comments have a 1 week turn-around time. This includes TV, NTV, and General.	Done	100%	T. Martin	prior	



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P13		Prior to the issuance of a NTV permit or a permit renewal a source may not be in compliance with all rule/permit condition provisions. If so a compliance plan is allowed. Increased communication is necessary to ensure that any new permit/renewal has a compliance plan, if needed.	Policy being drafted			L. Kon E. Funderburk		
P14	P28 P33 P50 P64 P73 P101	Training / Education – Permitting is often the group to first encounter new federal rules or revisions to existing rules.	Cross-Divisional training Encourage dialog between divisions	Ongoing	100%	Supervisors Managers		
			Department training on EMS permit search screen	Creating training	50%	L. Kon	June 2013 for compliance	
			Application review checklist for TV and NTV	Final review by supervisors	100%	L. Kon		
			Send out SBA contact information with permits on cover letter and e-mail.	Template changed	100%	R. Sumner		
			Make Engineer site visit mandatory	SOP submitted to policy advisor	90%	R. Sumner	Oct 2013	
			Include permit quality as part of performance management plans	PMPs include a quality measurement	100%	Supervisors Managers		
P15	P27 P63 P71	Document Management / Records: Currently permitting generates documents (permits, TSD, correspondence) electronically. They are printed out as hardcopies, then scanned into digital format for incorporation into SIRE (digital > analog > digital). In addition to being redundant and inefficient, the final digital file is stored as an image. Text cannot be extracted from an image. As a result, redundant copies of identical documents must therefore be retained in other locations than SIRE.	Improve current system, process, and employee training.	Reviewing current system and process for improvements. Utilizing SharePoint and permit techs to maintain documents in electronic format and placement in Sire.	90%	W. Sterusky L. Swann		



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P16						Consolidated with P15		
P17		Some permit review effort may be wasted if an application review is conducted while waiting for a particular element to be submitted.	Revise policy on handling recalcitrant applicants to expand on ways to obtain information required to issue a permit. Revise completed application check list.	Policy revised and implemented	100%	T. Martin		
P18	P23 P44 P65 P66 P85	The first screening of an application may result in the entire application being returned to the applicant for incompleteness. This is done by mail (or by hand if the applicant is present and cannot correct the application). There is about a 10% rejection rate and there is considerable workload in processing an incomplete application.	Revise all permitting documents for greater ease of use and remove non-essential elements.	Start with NTV permit application.		R. Munoz	Feb. 2012	
			Focused outreach opportunities for application assistance in the form of open houses, reducing phone number contacts on applications, encourage pre-application meetings, and funnel questions and help toward SBA.	Set-up open-house schedule of 1x/month. Get with PIO to send out message and put on web.	100%	K. Hooker	25 Jan. 2012	
			Web based application assistance.	Start with dust control permit.	50%	W. Sterusky	Feb. 2012	
			Revise instructions for NTV application.		50%	L. Swann	Jan. 2012	
P19	P86 P100 P107	Rather than cutting and pasting EVERY part of a specific rule into a source's permit conditions, why not just put in the parts that actually apply to the source.	Review process for all permit condition templates. Start with a group for the established templates and use existing review process for new templates.	Prioritize list of templates	100%	T. Martin	Feb. 2012	
				Organize meetings, comments, and changes Goal of 1 template completed every 2 weeks.	80%	S. Seuberling	Dec. 2012	
				Contact division managers for employee participation	100%	L. Swann	Jan. 2012	



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			Show rule effective date on TSD, so it is clear which version of the rule was used if changes occur around date of issuance.	Notation on TSD and training	100%	T. Martin R. Sumner		
			Include other permit quality measures during next iteration of PMPs.	Update PMPs	100%	T. Martin R. Sumner	July 2012	
P20		Create the opportunity for review of certain testing or monitoring requirements within a permit to reduce frequency of that requirement when warranted.			50%	R. Munoz E. Funderburk		
P21		If monitoring data is required, the department should provide feedback on whether site specific sampling data is ok to use. Permit says we need approval first.				R. Munoz		
P22		The department should provide documentation of decision/policy changes	Develop procedure on posting policies/decisions.	Done	100%	Leadership team	May 2011	
P23	P18 P44 P65 P66 P85	When an incorrect permit application (general or NTV) is submitted, the entire permit application must be returned for re-submittal.	Revise all permitting documents for greater ease of use and remove non-essential elements.	Start with NTV permit application.		R. Munoz	Feb. 2012	
			Focused outreach opportunities for application assistance in the form of open houses, reducing phone number contacts on applications, encourage pre-application meetings, and funnel questions and help toward SBA.	Set-up open-house schedule of 1x/month. Get with PIO to send out message and put on web.	100%	K. Hooker	25 Jan. 2012	
			Web based application assistance.	Start with dust control permit.	50%	W. Sterusky	Feb. 2012	



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			Revise instructions for NTV application.		50%	L. Swann	Jan. 2012	
P24	P37 P41	MCAQ issues general permits to facilities a few months prior to the general permit expiration date and still requires another application prior to the expiration date. Many facilities are confused and do not understand that they need to submit another general permit application prior to the expiration date.	Policy to automatically renew general permits issued 0-6 months prior to expiration and include a cover letter with general permits issued 6-12 months prior to expiration.	Policy drafted waiting for signature by policy advisor.	100%	R. Sumner L. Kon	Implemented August 2012	
P25	P36 P42	MCAQ sends annual invoices to permits that are expired. Inspectors then proceed to issue violations to the facility for not having a valid permit, but the facility has been continually paying its annual fees.	Modify EMS to add a column on the annual fees invoice report that shows expiration date of permit so expired permits will not receive an invoice.	IT request submitted, awaiting resources.	50%	L. Swann	December 2013	
P26	P12 P72	Many inspectors do not received information concerning the Compliance Permit Review/Comments period for new/renewal NTV and TV permits.	List of draft permits is sent out to specific list of employees every week. Comments have a 1 week turn-around time. This includes TV, NTV, and General.	Done	100%	T. Martin	prior	
P27	P15 P63 P71	Lack of electronic filing system makes application processing more difficult.	Improve current system, process, and employee training.	Reviewing current system and process for improvements.	100%	Supervisors Managers		
P28	P14 P33 P50 P64 P73 P101	There could be an issue/processes at the facility that the Permit Engineer is unaware of that makes it difficult for the facility to comply with their permit conditions after issuance.	Cross-Divisional training Encourage dialog between divisions	Ongoing	50%	L. Kon	June 2013 for compliance	
			Department training on EMS permit search screen	Creating training	100%	L. Kon	Jan. 2012	
			Application review checklist for TV and NTV	Final review by supervisors	100%	R. Sumner		



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Issue	Combine	Issue	Recommendation/Proposed Solution	Implementation Status	% Complete	Follow-Up Assignment	Timeline	Quantification
			Send out SBA contact information with permits on cover letter and e-mail.	Template changed	80%	R. Sumner	Feb. 2012	
			Make Engineer site visit mandatory	Revising policy/sop	100%	Supervisors Managers		
			Include permit quality as part of performance management plans	PMPs include a quality measurement	100%	Supervisors Managers		
P29		Only one person knows the current situation of expired permits, delinquencies, unpaid penalties, and void & waived charges.	Determined to not be a valid issue as EMS and Permits Plus provides access to information.		100%			
P30		Mailing out of copies of general permits takes a lot of time and money and may not be necessary.	Email general permits instead of sending by mail. Place a copy of the email cover sheet in the permit file to show when and where it was emailed.	Done	100%		April 2011	
P31	P4	It is unclear how quickly the contents of the courier bag from OSS is distributed. No single person is designated as being responsible.	Define Courier duties	Duties defined and rotating schedule established with staff and EnvSvc	100%	C. Durrant	March 2011	
P32	P5	If an application is found to be incomplete there are several letters issued sequentially if the required information is not provided. This can represent an extended period of time.	Revise policy on handling recalcitrant applicants to expand on ways to obtain information required to issue a permit.	Policy revised and implemented	100%	T. Martin		
P33	P14 P28 P50 P64 P73 P101	On occasion, an application may not fully cover all facility operations that require a permit.	Cross-Divisional training Encourage dialog between divisions	Ongoing	100%	Supervisors Managers		
			Department training on EMS permit search screen	Creating training	50%	L. Kon	June 2013 for compliance	
			Application review checklist for TV and NTV	Final review by supervisors	100%	L. Kon	Jan. 2012	



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			Send out SBA contact information with permits on cover letter and e-mail.	Template changed	100%	R. Sumner		
			Make Engineer site visit mandatory	Revising policy/sop	80%	R. Sumner	Feb. 2012	
			Include permit quality as part of performance management plans	PMPs include a quality measurement	100%	Supervisors Managers		
P34		With the advent of the universal inspector program, other division employees have been approached more frequently by compliance staff seeking answers to questions about permit requirements for permits with which they are unfamiliar. This communication approach limits the knowledge gained to individual inspectors which is not shared systematically to benefit all appropriate compliance staff.			UNK	Moved to compliance issues C54 and C57.		
P35		New permits are opened while the old permit is still open, this causes problems with billing. Also creates extra work for Enforcement, they might issue an NOV even though the business is already gone.				W. Sterusky		
P36	P25 P42	Expired permits may be in an expired status for months or even years.	Modify EMS to add a column on the annual fees invoice report that shows expiration date of permit so expired permits will not receive an invoice.	IT request submitted, awaiting resources.	50%	L. Swann	July 2012	
P37	P24 P41	Given the length of time between when a facility receives a renewal notice and when the permit expires, the facility will sometimes set aside the renewal form and forget to respond. Specifically, a general permit can be processed	Policy to automatically renew general permits issued 0-6 months prior to expiration and include a cover letter with general permits issued 6-12 months prior to expiration.	Policy drafted waiting for signature by policy advisor.	100%	R. Sumner L. Kon	.	



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		very quickly. The rule requires a permit renewal application to be submitted between 6 and 18 months prior to expiration. A general permit renewal reminder is sent 9 months in advance and then another reminder is sent at the 6 month marker. No other notices are sent. See rule 210, sec 301.2.						
P38		New versions of applications and or fee need to be prepared prior to effective date. Applications should be ready at least three months prior.	Update and post new applications on the department's website at least 3 months prior to the effective date (especially important for general permits which have a set expiration date). Clearly identify the last day that an old application will be accepted. Update the website and application cover page prior to the effective date.	Done	100%		none	
P39	P46 P83	Activities performed for 7 and 30 day Notices do not result in any fee payment and permit engineers are not able to charge for time spent on this activity	Review feasibility as part of Rule 280 revisions for 2013	There is an amount of time in the fee model for 7 and 30 day Notices that is then allocated to all permits, so every permit pays a small part of the total cost. At the very least David will be updating the time component in the fee model (the number of notices and the time to complete them) in the upcoming fee model/rule revision.	10%	R. Sumner D. Bruce Planning & Analysis	Jan. 2014	



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P40	P43 P52	An inspector apparently may not make a determination that an activity is de minimus and, therefore, does not require a permit. The result is that a company is advised to submit a permit application (with application fee of \$200) to obtain a definitive determination. This practice is required even though the activity may clearly be de minimus.	Determinations can be made by inspectors. In-service training and resources will be provided to assist.	Ongoing	100%	T. Martin		
P41	P24 P37	If a general permit is issued within a short period of time prior to the expiration of the general permit, a new ATO is required when the general permit is renewed. A person initially receiving an ATO shortly before the general permit expires may believe they have the permit for at least a year or longer when in actuality, their authorization will only last a short time.	Policy to automatically renew general permits issued 0-6 months prior to expiration and include a cover letter with general permits issued 6-12 months prior to expiration.	Policy drafted waiting for signature by policy advisor.	100%	R. Sumner L. Kon		
P42	P25 P36	Expired permits that are not closed in a timely manner represent a logistical problem. If not officially closed, they remain active in the database system and unintended actions will take place, e.g., issuing invoices, even though the facility may no longer exist.	Modify EMS to add a column on the annual fees invoice report that shows expiration date of permit so expired permits will not receive an invoice.	Close-out policy drafted waiting for policy advisor.	100%	R. Sumner	Implemented October 2012	
P43	P40 P52	The potential exists for differing interpretations of the department's rules relating to a de minimus activity that does not require a permit.	Determinations can be made by inspectors. In service training and resources will be provided to assist.	Ongoing	100%	T. Martin		



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P44	P18 P23 P65 P66 P85	Individuals preparing a permit application need guidance while the application is being developed. It is difficult to identify the appropriate individual to contact.	Revise all permitting documents for greater ease of use and remove non-essential elements.	Start with NTV permit application.		R. Munoz	Feb. 2012	
			Focused outreach opportunities for application assistance in the form of open houses, reducing phone number contacts on applications, encourage pre-application meetings, and funnel questions and help toward SBA.	Set-up open-house schedule of 1x/month. Get with PIO to send out message and put on web.	100%	K. Hooker	25 Jan. 2012	
			Web based application assistance.	Start with dust control permit.	50%	W. Sterusky	Feb. 2012	
			Revise instructions for NTV application.		50%	L. Swann	Jan. 2012	
P45		The potential exists for funds that may be a "credit" for one permit application may not be readily available to the permit applicant under certain circumstances.	Identify a protocol allowing a credit to be allocated to another permit.			C. Blagowsky		
P46	P39 P83	Once a permit is issued, there may be a need for continuing discussions with the Permittee as the Permittee seeks clarification about permit conditions. The time spent by a permit engineer on this activity is not charged to the permit holder.	Review feasibility as part of Rule 280 revisions for 2013	The fee model has a small amount of time allocated to each permit that could be expected to cover this. if this is a large drain on our resources we should examine how much time is applied in the model, and how it is applied.	10%	R. Sumner D. Bruce Planning & Analysis	Jan. 2014	
P47	P54	A permit application under review by a permit engineer may be delayed if the permit engineer becomes too busy.	Meeting with engineers monthly to monitor workload. Monthly assessment of permitting timeframes. Cross-training in process Targeted application assignment	Ongoing	100%	T. Martin R. Sumner L. Swann		



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P48		Fees paid for an application may need to be applied to another application under certain conditions.		Recommendation developed	100%	Leadership team		
P49		Permit holders may not be aware of a change in the fee table to which their permit is assigned. This creates confusion and unnecessary follow-up when an invoice is sent and the fee charged is a surprise.	Add a check box to the application review checklist, justify on TSD, and provide TSD to source.	Added to checklist.	100%	R. Munoz L. Kon		
P50	P14 P28 P33 P64 P73 P101	Too much time is being taken by the inspector to determine compliance with standards that the permit engineer should have made when drafting the permit.	Cross-Divisional training Encourage dialog between divisions	Ongoing	100%	Supervisors Managers		
			Department training on EMS permit search screen	Creating training	50%	L. Kon	June 2013 for compliance	
			Application review checklist for TV and NTV	Final review by supervisors	100%	L. Kon	Jan. 2012	
			Send out SBA contact information with permits on cover letter and e-mail.	Template changed	100%	R. Sumner		
			Make Engineer site visit mandatory	Revising policy/sop	80%	R. Sumner	Feb. 2012	
			Include permit quality as part of performance management plans	PMPs include a quality measurement	100%	Supervisors Managers		
P51		A fee paid for a general permit that is not required may not be refunded. Refunds are only processed when requested. This is the "no permit needed" scenario.		Policy awaiting review	80%	C. Blagowsky		
P52	P40 P43	A permit application may be submitted in response to a "no permit" NOV being issued. Upon review, it may be determined that a permit was not required. The permit applicant, however, has lost an application fee and time preparing the application when it was not necessary.	Determinations can be made by inspectors. In service training and resources will be provided to assist.	Ongoing	100%	T. Martin		
			Policy for refund of fees	Policy awaiting review	80%	C. Blagowsky		



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P53	P59	Mailed-in requests for subcontractor licenses have a high rate of failure – 30 to 40% do not pass AZ Corporation commission validation. These are difficult to clear and are placed into indefinite hold.	Modified forms	Done	100%	W. Sterusky	April 2012	
P54	P47	General permits represent approximately 60% of the total permits issued by the department yet few staff are involved in this effort. The continuity of the program is a concern as are delays in processing permits due to staff absence and inadequately trained backup.	Cross-training with DST staff to provide a back-up system.	Created 2 DSS positions which along with the supervisor have been trained to approve general permits.	100%	L. Swann W. Sterusky	April 2012	
P55		Deleted from list.			Deleted from list.			
P56		De minimus permit determination letters are being sent to the applicant using certified mail. There may be no reason why letters are required to be sent certified.	Send by 1 st class or e-mail.	done	100%	Leadership		
P57	P58 P84	Some facilities request a permit even though a permit is not required. The department is granting these requests.	Develop procedure and template letter for de minimus sources.	Policy awaiting review	80%	M. Hammond		
P58	P57 P84	The existing de minimus letter may not adequately meet facility needs.	Develop procedure and template letter for de minimus sources.	Policy awaiting review	80%	M. Hammond		
P59	P53	Subcontractor registrations go into an indefinite hold when information cannot be verified and the applicant cannot be contacted.	Modified forms	Done	100%	W. Sterusky	April 2012	
P60	P67	Operations and Maintenance (O&M) Plans for	Engineers will approve plans submitted for	Done	100%	none		



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	P68A	non-title V permits are not reviewed by the permit writer. This can lead to imperfect reviews even though the O&M Plan is approved.	applications and facility changes. Compliance will approve plans submitted based on compliance request.	Draft SOP sent to J. Crumbaker for finalization. SOP finalized	100%	L. Swann	Feb. 2012	
P61		Facilities may have multiple sources which may be addressed through permit conditions. An inspection of a sand and gravel facility covered by Rule 316 may not refer to these other sources in the inspection reports. The facility's comprehensive compliance status is, therefore, not fully understood on the basis of reviewing the inspection report.			UNK	Moved to compliance C35.		
P62		A greater sense of teamwork is needed and an understanding that each division within the department must rely on the other to be fully successful in meeting the department's mission.	Incorporated as part of every employee's performance management plan.	Done	100%	Leadership Team/ESS issue		
P63	P15 P27 P71	All documents that are relevant to a facility should be scanned and entered into SIRE.	Improve current system, process, and employee training.	Reviewing current system and process for improvements.	10%	R. Sumner L. Swann		
P64	P14 P28 P33 P50 P73 P101	Permits are difficult to comprehend to many permit holders which leads to non-compliance by virtue of just not understanding what the permit requires the permit holder to do to achieve compliance.	Cross-Divisional training Encourage dialog between divisions	Ongoing	100%	Supervisors Managers		
			Department training on EMS permit search screen	Creating training	50%	L. Kon	June 2013 for compliance	
			Application review checklist for TV and NTV	Final review by supervisors	100%	L. Kon	Jan. 2012	
			Send out SBA contact information with permits on cover letter and e-mail.	Template changed	100%	R. Sumner		
			Make Engineer site visit mandatory	Revising policy/sop	80%	R. Sumner	Feb. 2012	
			Include permit quality as part of	PMPs include a quality	100%	Supervisors		



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			performance management plans	measurement		Managers		
P65	P18 P23 P44 P66 P85	Submitted permit applications are often not complete	Revise all permitting documents for greater ease of use and remove non-essential elements.	Start with NTV permit application.		R. Munoz	Feb. 2012	
			Focused outreach opportunities for application assistance in the form of open houses, reducing phone number contacts on applications, encourage pre-application meetings, and funnel questions and help toward SBA.	Set-up open-house schedule of 1x/month. Get with PIO to send out message and put on web.	100%	K. Hooker	25 Jan. 2012	
			Web based application assistance.	Start with dust control permit.	50%	W. Sterusky	Feb. 2012	
			Revise instructions for NTV application.		50%	L. Swann	Jan. 2012	
P66	P18 P23 P44 P65 P85	Technical assistance in preparing permit applications would be very helpful in reducing application fault percentage.	Revise all permitting documents for greater ease of use and remove non-essential elements.	Start with NTV permit application.		R. Munoz	Feb. 2012	
			Focused outreach opportunities for application assistance in the form of open houses, reducing phone number contacts on applications, encourage pre-application meetings, and funnel questions and help toward SBA.	Set-up open-house schedule of 1x/month. Get with PIO to send out message and put on web.	100%	K. Hooker	25 Jan. 2012	
			Web based application assistance.	Start with dust control permit.	50%	W. Sterusky	Feb. 2012	
			Revise instructions for NTV application.		50%	L. Swann	Jan. 2012	
P67	P60 P68A	The O&M plan approval is routed through Compliance. This is not a necessary step.	Engineers will approve plans submitted for applications and facility changes.	Done	100%	none		
			Compliance will approve plans submitted based on compliance request.	Draft SOP sent to J. Crumbaker for finalization. SOP finalized	100%	L. Swann	Feb. 2012	



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P68A	P60 P67	It is not clearly understood when an O&M plan was submitted. This can result in delayed enforcement and extended noncompliance.	Engineers will approve plans submitted for applications and facility changes. Compliance will approve plans submitted based on compliance request.	Done	100%	None		
				Draft SOP sent to J. Crumbaker for finalization. SOP finalized	100%	L. Swann	Feb. 2012	
				Secondary step: Request to IT for modification of database for input of received and approved dates of plans.	Request submitted; awaiting IT resources. Information sent to IT on 13 Feb. 2012 Modifications made	100%	L. Swann	
P68B	P103	It is not clearly understood for what equipment or processes an O&M plan is required	Draft a document for sources outlining typical equipment and parametric monitoring.	In draft	80%	R. Tate		
P69		On occasion a permit renewal may contain changes more properly covered in a minor modification. The changes may be inadvertently approved.	Applications modified to clearly outline what is acceptable for a renewal. Engineers require revision application for modifications discovered after renewal submittal.	Done	100%	None		
P70		Some facilities are simply not aware that a permit is required for an activity. In some instances, other county permits have been obtained so awareness is the major factor in their not obtaining a permit.	Creating reference materials for department web page.		50%	A. Lahouti		
P71	P15 P27 P63	Due to the absence/lack of a tracking system, time sensitive paperwork gets delayed, which in turn may result in issuance of NOV...and...subsequently extensive shuffling of paperwork which consume MORE time for	Improve current system, process, and employee training.	Reviewing current system and process for improvements.	10%	R. Sumner L. Swann		



Permitting Workgroup Issue Identification

Issue	Combine	Issue	Recommendation/Proposed Solution	Implementation Status	% Complete	Follow-Up Assignment	Timeline	Quantification
		compliance, enforcement, and permitting.						
P72	P12 P26	Internal review of non-title V permit was recently determined to be truncated: compliance and enforcement had not for some time been able to provide comments.	List of draft permits is sent out to specific list of employees every week. Comments have a 1 week turn-around time. This includes TV, NTV, and General.	Done	100%	T. Martin	prior	
P73	P14 P28 P33 P50 P64 P101	Permits contain complicated requirements/conditions that may not be understood or complied with and may lead to difficulty in proving a violation if not identified early on.	Cross-Divisional training Encourage dialog between divisions	Ongoing	100%	Supervisors Managers		
			Department training on EMS permit search screen	Creating training	50%	L. Kon	June 2013 for compliance	
			Application review checklist for TV and NTV	Final review by supervisors	100%	L. Kon	Jan. 2012	
			Send out SBA contact information with permits on cover letter and e-mail.	Template changed	100%	R. Sumner		
			Make Engineer site visit mandatory	Revising policy/sop	80%	R. Sumner	Feb. 2012	
			Include permit quality as part of performance management plans	PMPs include a quality measurement	100%	Supervisors Managers		
P74		Printing and conveying documents from One Stop to Central Ave. is unnecessary and can be done more efficiently by simply printing documents at Central Ave.	Renewals printed at Central	Done	100%	none		
P75		When inspectors issue a "no permit" NOV, they use a separate form			UNK	Move to compliance		
P76		How long should each type of permittee be given to submit an application after an NOV is issued?			UNK	Move to compliance		



Permitting Workgroup Issue Identification

Issue	Combine	Issue	Recommendation/Proposed Solution	Implementation Status	% Complete	Follow-Up Assignment	Timeline	Quantification
P77		Documentation of closing an NOV without a disposition inspection?			UNK	Move to compliance		
P78		Performance testing has a backlog and the activity of performance testing is inherently more of an engineering task than a compliance task.			UNK	Move to compliance		
P79		The placement of performance testing in a division separate from permitting creates the opportunity for miscommunication and represents an inefficient use of resources.			UNK	Move to compliance		
P80		When a permit close-out is requested via permitting, should an inspector be notified to conduct a final closeout walk through of a facility; verify lock out tag out and equipment break down?			UNK	Move to compliance		
P81		Inspectors are not allowed to change a complaint's status.			UNK	Move to compliance		
P82		Issue deleted						
P83	P39 P46	Currently there is a 14 day calendar day timeline on the approval of dust permit. This may be too long a period for some projects that wish to start immediately.	Review feasibility as part of Rule 280 revisions for 2013		R. Sumner D. Bruce Planning & Analysis	Jan. 2014	R. Sumner D. Bruce Planning & Analysis	
			Move toward an over-the-counter approval of dust control permits	Cross training of staff on counter procedures, permit intake, and	50%	W. Sterusky	July 2013	



Permitting Workgroup Issue Identification

Issue	Combine	Issue	Recommendation/Proposed Solution	Implementation Status	% Complete	Follow-Up Assignment	Timeline	Quantification
				approval.				
P84	P57 P58	The use of the term de minimus may be confusing if used in a letter to a permit applicant. The term is used as short hand to mean a non-regulated activity.	Develop procedure and template letter for de minimus sources.	Policy awaiting review	80%	M. Hammond		
P85	P18 P23 P44 P65 P66	The non-title V application that is required to be filled out is unsuitable (overkill) for a site with only a large generator.	Revise all permitting documents for greater ease of use and remove non-essential elements.	Start with NTV permit application.		R. Munoz	Feb. 2012	
			Focused outreach opportunities for application assistance in the form of open houses, reducing phone number contacts on applications, encourage pre-application meetings, and funnel questions and help toward SBA.	Set-up open-house schedule of 1x/month. Get with PIO to send out message and put on web.	100%	K. Hooker	25 Jan. 2012	
			Web based application assistance.	Start with dust control permit.	50%	W. Sterusky	Feb. 2012	
			Revise instructions for NTV application.		50%	L. Swann	Jan. 2012	
P86	P19 P100 P107	Inconsistent permit conditions (e.g. inconsistent performance test requirements and/or Subpart OOO opacity requirements) make it difficult to consistently determine compliance with requirements and may also lead to unfair competitive advantage for one facility versus another of the exact same type.	Review process for all permit condition templates. Start with a group for the established templates and use existing review process for new templates.	Prioritize list of templates	100%	T. Martin	Feb. 2012	
				Organize meetings, comments, and changes Goal to complete 1 template every 2 weeks	80%	S. Seuberling	Dec. 2012	
				Contact division managers for employee participation	100%	L. Swann	Jan. 2012	
			Show rule effective date on TSD, so it is clear which version of the rule was used if changes occur around date of issuance.	Notation on TSD and training	100%	T. Martin R. Sumner		
			Include other permit quality measures during next iteration of PMPs.	Update PMPs		T. Martin R. Sumner	July 2012	



Permitting Workgroup Issue Identification

Issue	Combine	Issue	Recommendation/Proposed Solution	Implementation Status	% Complete	Follow-Up Assignment	Timeline	Quantification
P87		Performance testing is facing a significant workload backlog. A formal written report (data entry and report writing) are time intensive and contribute to the backlog given the staff allocation.			UNK	Moved to compliance C69		
P88		Online payment of fees and submittal of applications is not currently available.	None – should be resolved through conversion to ACCELA.	Work on Accela has stalled due to IT resources, but will pick back up in Jan. 2013. ~50% of the development has been completed.	10%	L. Swann	June 2013 for dust control permits	
P89		Permit requirements need to be understood by businesses when determining whether to open or relocate a business.				K. Hooker	Dec. 2013	
P90	P3 P111	A permit applicant may not know the status of a permit application following its submittal.	Issue a letter confirming receipt of an application that has been mailed-in. EMS has the capability to generate acknowledgment electronically (as in Complaints).	A system generated e-mail is now sent out with TV, General, and NTV permit applications.	100%	T. Martin R. Sumner		
				IT is working on requests for system generated responses for Dust, subcontractor, and asbestos notifications. IT request # 1422 and #1707.	85% Dust completed	L. Swann	Start 21 Dec. 2011	



Permitting Workgroup Issue Identification

Issue	Combine	Issue	Recommendation/Proposed Solution	Implementation Status	% Complete	Follow-Up Assignment	Timeline	Quantification
P91		Permits may require “tweaks” to improve content and enforceability but the identification of “tweaks” is not systemized.	Inspectors will put comments about conditions in the permit maintenance comments. Engineers will check here when reviewing an application. Trend issues will be identified by supervisors to be discussed at permitting/compliance meetings.	Done	100%	None		
P92		General permits represent an expedited permit issuance process but not all opportunities for developing general permits for other classes of permits have been explored.	In process of developing general permit for stationary sources subject to only Rule 310.	Ongoing	100%	R. Sumner		
P93	P96	Some activities now required to obtain a permit may represent very small to insignificant emissions.	Possible temporary permit.	Rule 200 revisions		P&A L. Swann		
P94		Compliance and permitting have different views on what exactly collocation means. Our department needs a more clear (black/white) definition of what collocation is. We have two documents at this time – one from the lawyer and one from Doug Erwin. The documents are different and I do not think either one is “official”.	Draft department guidance.			T. Martin		
P95	P97 P98	It is difficult to determine how long a portable has been in the county – what proof do we need as inspectors?	Work with ADEQ on portable tracking.			L. Swann R. Sumner		
P96	P93	Some facilities/construction sites rent a piece of equipment (let’s say a crusher). The equipment is not permitted by the owner because they do not want responsibility, so the lessee takes out the permit. Our permits can	Possible temporary permit.	Rule 200 revisions		P&A L. Swann		



Permitting Workgroup Issue Identification

Issue	Combine	Issue	Recommendation/Proposed Solution	Implementation Status	% Complete	Follow-Up Assignment	Timeline	Quantification
		take up to 6 months to approve, often this equipment is needed ASAP. Today I have heard that the average time for NTV to get approved is 37 days, while better this amount of time is still too long for this specific issue.						
P97	P95 P98	Tracking of state portables entering and working within the county is difficult to track. Many of these facilities are not regulated.	Work with ADEQ on portable tracking.			L. Swann R. Sumner		
P98	P95 P97	Violations are issued to facilities that have a state permit, but they have been working within the county for >5 years.	Work with ADEQ on portable tracking.			L. Swann R. Sumner		
P99		Technical support documents are not extended/provided to every permittee.	TSD are sent with draft permits to applicants.	Done	100%	none		
P100	P19 P86 P107	Permits only reference the rule and section number.	Review process for all permit condition templates. Start with a group for the established templates and use existing review process for new templates.	Prioritize list of templates	100%	T. Martin	Feb. 2012	
				Organize meetings, comments, and changes Goal to have 1 template completed every 2 weeks	30%	S. Seuberling	Dec. 2012	
				Contact division managers for employee participation	100%	L. Swann	Jan. 2012	
				Show rule effective date on TSD, so it is clear which version of the rule was used if changes occur around date of issuance.		T. Martin R. Sumner		
				Include other permit quality measures during next iteration of PMPs.		T. Martin R. Sumner	July 2012	
P101	P14 P28 P33	Permit engineers do not, in all cases, visit a site when developing a permit application.	Cross-Divisional training Encourage dialog between divisions	Ongoing	100%	Supervisors Managers		
			Department training on EMS permit search	Creating training	50%	L. Kon	June 2013	



Permitting Workgroup Issue Identification

Issue	Combine	Issue	Recommendation/Proposed Solution	Implementation Status	% Complete	Follow-Up Assignment	Timeline	Quantification
	P50 P64 P73		screen				for compliance	
			Application review checklist for TV and NTV	Final review by supervisors	100%	L. Kon	Jan. 2012	
			Send out SBA contact information with permits on cover letter and e-mail.	Template changed	100%	R. Sumner		
			Make Engineer site visit mandatory	Revising policy/sop	80%	R. Sumner	Feb. 2012	
			Include permit quality as part of performance management plans	PMPs include a quality measurement	100%	Supervisors Managers		
P102		If you have both 310 and 316 sites you should be able to send everyone to the 316 water truck course. It is the more stringent rule, and it is an unnecessary burden to have to get people through both just to be able to run a water truck and implement controls (which is the objective).	Existing policy	Done	100%	None		
P103	P68B	The contents of an O&M plan such as the operating parameters and maintenance schedules, plus its respective recordkeeping logs are often (not always), part of the permit conditions.	Draft a document for sources outlining typical equipment and parametric monitoring.	In draft	80%	R. Tate		
P104		Dust control permits are only good for one year then they must be reissued. When reissued, an inspector will not know that the permit is for a continuing operation. Inspections may be conducted at a site that has already been inspected adequately.	Allow a long running construction project to have the same permit number.	Will be implemented with Accela.		L. Swann		
P105		When an error (e.g. EMS, P+, and/or paperwork) is discovered the tendency is to resolve the concern for the immediate circumstance without addressing the underlying cause.	This is an ongoing training and procedure issue.	Ongoing	100%	All		



Permitting Workgroup Issue Identification

Issue	Combine	Issue	Recommendation/Proposed Solution	Implementation Status	% Complete	Follow-Up Assignment	Timeline	Quantification
P106		With respect to emission inventory responses, these are now sent to the One Stop Shop. OSS staff do not do anything with them except open the mail and send it via courier bag back to the Planning division at Central (except for Title V where some minimal input is necessary). Emission Inventory reports may not be returned to the Planning Office immediately.	The next EI surveys will have a return address for Central Ave.	Done	100%	B. Downing		
P107	P19 P86 P100	Draft permits sent out (internally and externally) not only have issues with the regulatory language, but also issues with grammar, spelling, and formatting.	Review process for all permit condition templates. Start with a group for the established templates and use existing review process for new templates.	Prioritize list of templates	100%	T. Martin	Feb. 2012	
				Organize meetings, comments, and changes Goal to have 1 template completed every 2 weeks	80%	S. Seuberling	Dec. 2012	
				Contact division managers for employee participation	100%	L. Swann	Jan. 2012	
			Show rule effective date on TSD, so it is clear which version of the rule was used if changes occur around date of issuance.	100%	T. Martin R. Sumner			
			Include other permit quality measures during next iteration of PMPs.		T. Martin R. Sumner	July 2012		
CONTINUING IMPROVEMENTS								
P108		Payment receipts are being filed for all training participants. This is an unnecessary waste as the receipt can be reprinted from Permits Plus if needed.	We will no longer keep hard copies of training payment receipts.	Done	100%	R. Danley B. Munoz		



Permitting Workgroup Issue Identification

Issue	Combine	Issue	Recommendation/Proposed Solution	Implementation Status	% Complete	Follow-Up Assignment	Timeline	Quantification
P109		Record requests for permit searches and file reviews are time consuming for staff. This information should be more readily accessible.	Provide computer kiosk in lobby with read access to Sire.	Done	100%	L. Swann		
P110		Renewals for non-title V and general permits are not submitted with a payment so they do not need to go through OSS. This creates additional work for a busy counter.	Have renewal applications for non-title V and general permits sent to Central. E-mail address created for submission of applications.	Done	100%	T. Martin R. Sumner L. Swann		
P111	P3 P90	Currently we are sending asbestos notifications back to contractors indicating that it is their "final copy to be kept onsite". This is an approval process that extends beyond our authority.	Message sent to contractors that they will no longer be receiving a "final copy". Their receipt will serve as confirmation of receipt. An electronic copy of the receipt is being e-mailed to those customers that mail in their notifications.	Done	100%	S. Wright		
			Automatic e-mail generation for confirmation of receipt from Permits Plus.	IT request # 1422 and #1707.	50%	L. Swann	Start 21 Dec. 2011	
P112		Permit files are kept alphabetically by name of the source when every other action is based on the permit number. Locating files can be difficult if you are not familiar with alphabetical naming conventions (e.g. Town of Gilbert vs Gilbert, Town of).	Change permit files to a numerical system based on permit number.	In process	70%	R. Sumner L. Swann		
P113		All permit applications on-line should have the option of filling and saving.	Place enabled word documents on the web.	Web update request made.		T. Martin W. Sterusky		
			Create enabled pdf permit applications for web application.	In process as part of PMP special project.		L. Swann R. Sumner		
P114		Some permit files are multi folder or extremely large. These should be stored offsite making	Box up permit files larger than 2" or in multiple folders for storage at Iron	In process	70%	R. Sumner L. Swann		



Permitting Workgroup Issue Identification

Issue	Combine	Issue	Recommendation/Proposed Solution	Implementation Status	% Complete	Follow-Up Assignment	Timeline	Quantification
		room for new records. Any documents in the files should already be in Sire.	Mountain. Creation of space will allow some permit files from 9 th floor to come to 4 th floor.					
P115		We are currently filing permits plus receipts for stationary sources. After OSS uses them to enter payments into EMS they are not needed and can be reprinted at any time. This will reduce the amount of paperwork scanned and filed.	Dispose of stationary source payment receipts at OSS or after administrative value served as these are copies of electronic records. Exceptions are receipts printed prior to July 2011 as the original accounting string will not print on reprint.	Update provided to staff on 7 February 2012.	100%	N. Luther-Kasemeier L Swann		
P116		Consistency between compliance and permitting in determining permit requirement is lacking.	Create reference guidelines for determining permit levels (e.g. what is used for determining 1 gallon/day or 3 lbs/day voc). Provide in service training to permitting, compliance, and SBA,	Ongoing to start April 2012.		R. Munoz		
P117		Applicants need more training on filling out applications so they are complete.	Institute training for different application types.	Dust Control Permits Ongoing	100%	K. Hooker S. Wright	Feb. 2012	
				316				
				Dust control plans				
P118		Some sources may move their business from one location to another without any change in emissions or equipment requiring that they close their old permit and apply for a new one.	Streamlined permit review SOP needs to be drafted.			R. Sumner		
P119		SBA needs to be able to have known contacts in permitting for walk-in customers.	Create an on-call engineer schedule with a cell phone given to the person on-call.	Implemented April 2012	100%	R. Sumner T. Martin		
P120		It is difficult and time consuming to bill for classes given offsite after the training has been provided.	Require a non-refundable payment for minimum off-site class size.	Requiring deposit for minimum number prior to start of class.	100%	L. Swann		
P121		The training program has a lot of multiple entry steps and additional databases that increase administrative time.	Replace ID cards with certificates printed out from Permits Plus. Reminder letters are unnecessary so cease	Create certificate and submit IT request #2339 Immediate	100% 100%	L. Swann R. Danley	Jan. 2013	



Permitting Workgroup Issue Identification

Issue	Combine	Issue	Recommendation/Proposed Solution	Implementation Status	% Complete	Follow-Up Assignment	Timeline	Quantification
			additional entry of participant addresses.			B. Munoz		
			On-line training	Compliance is looking into this.		Transfer to compliance		
			No more photo ID sheets	After implementation of certificates.	100%	R. Danley B. Munoz	Jan. 2013	
P122		Source codes and equipment codes have become duplicative, redundant, and messy. In some cases we are using "other" when a new code should be created.	Refine list of source codes and equipment codes in EMS. Provide training to Permitting on use and purpose of codes.	Agreement needed on updated list and change to EMS. Meeting held on 21 Feb. 2012	90%	S. Seuberling B. Downing	Mar. 2012	
P123		Dust permit close-out form is difficult to file without the site address	Include site address on form	Done	100%	W. Steursky		
P124		When mail from finance is returned as undeliverable it is sent to compliance for an inspector to follow-up. More research can be done in house so EMS can be updated and inspector time is not wasted.	Returned mail will be given to Permit Tech group for research and update. Field verification will be done on those few where research results in no new address.	Done	100%	W. Sterusky C. Blagowsky		
P125		The DSTs used to provide compliance a list of pending application numbers that were created for compliance actions. This helped determine if sources submitted an application especially where the inspector was no longer an employee or in a new area.	Once a month pull a list of pending applications for which no applications were received. Close where appropriate and pass on for follow-up others to compliance.	Done	100%	W. Sterusky		
P126		Site location codes are not being entered consistently for all types of permits. This used to be done in the past.	Enter site location codes for all permits at time of intake.	Done	100%	W. Sterusky		
P127		Some permit renewal reviews take longer than necessary, because the source does not answer correctly when asked about changes to process. This is especially problematic when incidental equipment changes have been made or	Attach a copy of the source equipment list to the renewal notice. (EMS enhancement) Change application to include request for update to equipment list with renewal.	IT request 12932	100%	L. Swann	July 2012	



Permitting Workgroup Issue Identification

Issue	Combine	Issue	Recommendation/Proposed Solution	Implementation Status	% Complete	Follow-Up Assignment	Timeline	Quantification
		changes not captured over the last 5 years.						
128		Need to have ongoing QA/QC checks of data entered into EMS for permits.	Have Permit Tech review prior to final step in permit issuance.			W. Sterusky		
129		It is difficult for a subcontractor to renew their registration with a credit card. They have to contact OSS, sent a form, and fax it back with the credit card information.	Modify the renewal form with a place at the bottom to provide credit card information and a direct fax number to AQ OSS. The credit card information would be cut off and destroyed after processing.	Done	100%	W. Sterusky		
130		The current public notice process creates a waste of paper.	Instead of printing permit conditions and equipment lists to go with the public notice sheet, records will get a copy from EMS should it be requested.	Done	100%	D. Gonzalez		
131		Approved dust control plans received with a permitting action are generally sent back to the source separate from the permit.	When the permit action is complete the DCP will be given to permit tech with billable hours. The permit tech will update the "Control Plan" information in EMS if not already done and mail the DCP to the source with the permit after the invoice has been paid.	Done	100%	UNK		
132		When someone wants a copy of the permit or TSD for a publicly noticed permit they have to submit a records request.	Post a copy of the permit and TDS on the web with the notice.	Will be implemented with Accela.		L. Swann	Mar 2014	
133		We receive too many requests for checks of permits at particular addresses or neighborhoods.	Create GIS map on-line showing current and closed permits.	IssueTrak 31325		T. Gaskill L. Swann		
134		NTV permit conditions are too lengthy.	Reduce length of general conditions.	Done	100%	T. Martin R. Sumner		
135		Too much paper is wasted on printing public notice documents out of EMS when it can be saved electronically.	Save pdf copies of documents into SharePoint with other electronic file documents.			W. Sterusky		



Permitting Workgroup Issue Identification

Issue	Combine	Issue	Recommendation/Proposed Solution	Implementation Status	% Complete	Follow-Up Assignment	Timeline	Quantification
136		Subcontractor files take u a lot of floor/cabinet space.	Scan and save electronic files to Sire and destroy hard copies.	Currently in process	20%	W. Sterusky R. Sumner L. Swann		
			Make new and renewal subcontractor requests completely online.	Done				
137		Sources not aware of possible use of General Permit	Add step in permitting checklist to evaluate source of General Permit applicability, then notify source if	Done		T. Martin R. Sumner		