

VSM PROCESS ISSUE # 1

Issue

At those points in the permit review process where the application cannot meet the timeframes established and a department denial or an Applicant withdrawal is required, industry is requesting that the application be placed in a holding pattern.

Examples in the process where this may occur:

The Permit Condition Review is at the 7-day resolution step. Applicant wishes to withdraw the application, place the application on hold, and then resume at the point in the Permit Condition Review Process where they left off.

The application is amended at such a point in the evaluation process that the review cannot be completed within the specified timeframe. The Applicant wishes to withdraw the application and resubmit and resume the process at the same step, bypassing the administrative and technical evaluations.

Foundation of the Redesign

During the redesign of the permit process we all agreed that the foundation of the process was time dependant: to get the permit issued in 6 months or less. We agreed that no holding periods were acceptable as this was the old process. We further agreed that starting the process later with better and more recent information would help ensure that rework would be minimized.

Discussion

There appears to be concern that upon a withdrawal of the application, the resubmittal and commencement of the review of the beginning the process again is just paperwork. It has been stated that when reestablishing a new application, the process should resume where the previous review left off. While in concept this appears to make sense, this position dismisses the need for the entire process and in effect puts the application on hold. Specifically, two issues arise:

If the new application is put immediately back to the withdrawal step of the previous application, what is gained other than a hold on this process step? The issue at hand remains unresolved and it is still under the time-frame dictated by the process. For the first example above, it restarts a 7-day clock with same unresolved issue. This hold on the process serves no one.

In reality, is the new application truly able to go back to the step in which it was withdrawn? In example two, we presume there is a substantial change in the permit applicant's proposal. The change is so significant that it must go back through the review process for evaluation. While it is acknowledged that the depth of the review should substantially be reduced, a review is still required per the rules. Therefore, resuming the process at the point where it was withdrawn is neither acceptable nor viable.

Agreed Solution

When any application is withdrawn, prior to reapplication, the Permit Team (consisting of the Applicant and the AQD) will meet to quickly reassess the proposal and establish an action plan and timeline for reapplication and review of the proposal. The plan and timeline will specify the information and activities that must be completed by both parties to assure timely review. This may include the Issue Resolution Process. While all applications must go through an administrative completeness check, a technical completeness check, and an engineer evaluation before the process can recommence, it is anticipated that in many cases these steps will require minimal review because of the previous efforts. This will ensure that all applications are processed efficiently and legally with responsibility clearly defined at each step in the process.

The Permit Engineer will be assigned the subsequent application whenever a permit application is withdrawn or denied, unless circumstances prevent such an assignment.