



County of Allegheny

Office of the Controller

INDEPENDENT AUDITOR'S REPORT ON
INTERNAL CONTROL OVER FINANCIAL REPORTING
AND ON COMPLIANCE AND OTHER MATTERS
BASED ON AN AUDIT OF FINANCIAL STATEMENTS
PERFORMED IN ACCORDANCE WITH
GOVERNMENT AUDITING STANDARDS

ALLEGHENY COUNTY HEALTH DEPARTMENT
TITLE V AIR QUALITY FUND
FOR THE YEAR ENDED DECEMBER 31, 2020

ISSUED: SEPTEMBER 2, 2021

Chelsa Wagner
Controller

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September 2, 2021

Dr. Debra L. Bogen
Director
Allegheny County Health Department
542 4th Avenue
Pittsburgh, PA 15219

**INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL OVER
FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED
ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE
WITH GOVERNMENT AUDITING STANDARDS**

Dear Dr. Bogen:

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of the Title V Air Quality Fund of the Allegheny County Health Department ("ACHD") as of and for the year ended December 31, 2020, and have issued our report thereon dated September 2, 2021.

Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered ACHD's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of ACHD's internal control. Accordingly, we do not express an opinion on the effectiveness of ACHD's internal control.

Dr. Debra L. Bogen
September 2, 2021

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether ACHD's Title V Air Quality Fund financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed an instance of noncompliance that is required to be reported under *Government Auditing Standards* and which is described in the accompanying schedule of findings and responses as item 20-01.

Allegheny County Health Department's Response to Findings

The ACHD's response to the finding identified in our audit is described in the accompanying schedule of findings and responses. The ACHD's response was not subjected to the auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on it.

Dr. Debra L. Bogen
September 2, 2021

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Kind regards,



Chelsa Wagner
Controller



Lori A. Churilla
Assistant Deputy Controller, Auditing

- cc: Honorable Patrick Catena, President, County Council
 Honorable Robert J. Macey, Vice-President, County Council
 Honorable Rich Fitzgerald, County Executive, Allegheny County
 Mr. William D. McKain, County Manager, Allegheny County
 Ms. Jennifer M. Liptak, Chief of Staff, County Executive
 Ms. Mary C. Soroka, Director, Budget and Finance
 Mr. Kenneth J. Varhola, Chief of Staff, County Council
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ALLEGHENY COUNTY HEALTH DEPARTMENT
TITLE V AIR QUALITY FUND
SCHEDULE OF FINDINGS AND RESPONSES
FOR THE YEAR ENDED DECEMBER 31, 2020

FINDING 20-01 FAILURE TO ISSUE OR DENY TITLE V OPERATING PERMITS WITHIN 18 MONTHS

Criteria: Title V Section 503(c) of the Clean Air Act indicates that permitting authorities “shall approve or disapprove a completed [Title V operating permit] application, and shall issue or deny the permit, within 18 months after the date of receipt thereof.”

Condition: As of December 31, 2020, ACHD had not issued or denied Title V operating permits for six of the 31 major sources in Allegheny County (19%) within 18 months from the date that complete permit applications were received. (A major source is generally a stationary source of air pollutants that directly emits or has the potential to emit 100 tons per year of any air pollutant, 50 tons per year of volatile organic compounds, 10 tons per year of any hazardous air pollutant, or 25 tons per year of a combination of hazardous air pollutants. Four of the entities categorized by the ACHD as major sources are smaller entities that do not have the potential to generate emissions at the levels described but are under common control and thereby affiliated with larger entities that do have the potential to generate such emissions.) The six major sources were:

- the Bellefield Boiler Plant (application received 6/15/18),
- the US Steel Clairton Plant (application received 9/26/16),
- Sunoco Partners Marketing and Terminals, formerly Sun Oil Pittsburgh Terminal (application received 12/30/15),
- Harsco Metals (application received 1/16/18),
- the Allegheny County Sanitary Authority, ALCOSAN (application received 6/19/14), and
- ATI Flat Rolled Products, formerly Allegheny Ludlum (application received 5/11/17)

The Harsco Metals, ALCOSAN, and ATI Flat Rolled Products applications were initial permit applications while the other three applications were renewal applications (Title V operating permits had

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FINDING 20-01 FAILURE TO ISSUE OR DENY TITLE V OPERATING PERMITS WITHIN 18 MONTHS (CONTINUED)

been issued but have expired). The failure to issue or deny Title V operating permits within 18 months is a repeat finding, first reported in our report on the year ended December 31, 2014.

While Eastman Chemicals and Resins has also been operating without a Title V operating permit for many years, it has not been included in the description of the condition above because it has not submitted a Title V operating permit application. It is the submission of an administratively complete Title V operating permit application that triggers the requirement for ACHD to issue or deny the Title V operating permit within 18 months. Although Eastman Chemicals and Resins has been operating without a Title V operating permit for many years, it was still obligated to comply with the provisions of installation permits that have been issued to it by the ACHD as well as the requirements of a federal consent decree during that time. The ACHD has advised us that the final installation permit, permit I027, was issued to Eastman Chemicals and Resins on August 11, 2021. The issuance of the installation permit triggered the consent decree requirement for Eastman Chemicals and Resins to submit a Title V operating permit application to the ACHD within 180 days.

We noted that progress has been made in the processing of Title V operating permits since December 31, 2020. We observed that Title V operating permits were issued to both the Bellefield Boiler Plant and Sunoco Partners Marketing and Terminals by the ACHD in February of 2021. We also observed that the ACHD has completed drafting the Title V operating permits for ALCOSAN and the US Steel Clairton Plant. The ACHD has advised us that it is awaiting stack test results for ALCOSAN to determine whether a compliance plan will need to be incorporated into the operating permit, and that the US Steel Clairton Plant draft operating permit is currently being reviewed internally.

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FINDING 20-01 FAILURE TO ISSUE OR DENY TITLE V OPERATING PERMITS WITHIN 18 MONTHS (CONTINUED)

Cause:

The initial backlog in the processing of Title V operating permit applications is believed to have been attributable to a variety of factors, including the application of inadequate personnel resources to the permitting function, the lack of an integrated data gathering and tracking system, and the failure to implement workflow improvements to increase efficiency. While measures were being taken by the ACHD prior to 2018 to address the Title V operating permit processing backlog, the ACHD developed a formal corrective action plan to eliminate the backlog at the request of the U.S. Environmental Protection Agency (EPA) in June of 2018. The corrective action plan submitted by the ACHD sought the elimination of the backlog within three years.

Staffing

At the beginning of 2020, the ACHD was two Permitting Engineer full-time equivalents (FTEs) short of the staffing level that had been recommended by an external consulting firm to help reduce the permit processing backlog. ACHD management had previously advised us that labor market conditions made it challenging to fill the two full-time Engineer Trainee positions that were created in 2018, but the ACHD did manage to fill both positions in 2020, one in January and one in March. However, the ACHD lost one Permitting Engineer FTE in March of 2020 as one of its Permitting Engineers transitioned to a leadership role in another functional area of the ACHD's Air Quality Program, making the ACHD still one FTE short of the recommended Permitting Engineer staffing level. Had the ACHD been operating at the recommended staffing levels for Permitting Engineers throughout 2020, it would likely have made more progress in eliminating the Title V operating permit processing backlog. ACHD management advised us that the open Engineer III position was filled in February 2021 through a promotion from within (which had no impact on total FTEs).

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FINDING 20-01 FAILURE TO ISSUE OR DENY TITLE V OPERATING PERMITS WITHIN 18 MONTHS (CONTINUED)

The ACHD has established and intends to fill an Engineer Trainee position in order to attain the recommended staffing level.

Data Gathering and Tracking System

The ACHD issued a Request For Proposals (RFP) for Air Quality Permitting and Enforcement Software in May of 2020 and entered into a contract with the successful bidder in August of 2020. We have been advised by ACHD management that a website has recently been established to test and evaluate the system that is being developed. While a new data gathering and tracking system was not being utilized during 2020, we did note that during 2018 some improvements in the tracking of the permitting process had been made, which appear to have contributed to the reduction in the permit processing backlog that we noted during the last two years.

Process Improvements

We noted that the ACHD has implemented various process improvements in recent years. We noted that the ACHD reallocated emissions sources among its permitting engineers to facilitate timelier issuance of Title V operating permits during 2018. We observed that the permitting function has since developed a template with sample language to simplify the addition of permit conditions for common processes and equipment, developed a new short form permit amendment application for simple changes in source ownership and/or responsible officials, and developed a short form permit application to facilitate timely permit issuance for certain types of minor source facilities (schools, nursing homes, hospitals, etc.) that only contain boilers, heaters, emergency generators, and/or small diesel storage tanks. These process improvements should reduce permit processing times and result in the Permitting Engineers having more time

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FINDING 20-01 FAILURE TO ISSUE OR DENY TITLE V OPERATING PERMITS WITHIN 18 MONTHS (CONTINUED)

available to process Title V operating permits. The ACHD has also recently assigned a particular engineer to address Requests for Determination (or RFDs, which are submitted by facilities in order to determine whether a new installation permit or a modification to an existing permit is required) and developed a template for the process to facilitate faster completion of the RFDs.

Circumstances Preventing Permit Issuance

In addition to the circumstances currently preventing the ACHD from issuing a Title V operating permit to Eastman Chemicals and Resins, we noted that circumstances beyond the ACHD's control have impacted its ability to issue Title V operating permits to two other major sources, Harsco Metals and ATI Flat Rolled Products.

We observed that a Consent Order and Agreement entered into on January 7, 2020 between the ACHD and Harsco Metals required Harsco Metals to take corrective action, which involved constructing a new building to house its slag processing which had formerly been conducted outdoors, and to change its slag processing methods. Until the slag processing was moved indoors and permitted, the Consent Order and Agreement required Harsco Metals to comply with a compliance plan that had been previously submitted to the ACHD and provided for penalties in the event of noncompliance. Harsco Metals constructed the building and submitted an installation permit application to the ACHD. The ACHD issued an installation permit to Harsco Metals on June 16, 2021, and Harsco Metals confirmed commencement of the indoors slag processing on August 2, 2021. Harsco Metals has 180 days from the issuance of the installation permit to file a Title V operating permit application.

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With respect to ATI Flat Rolled Products, the ACHD's current inability to issue a Title V operating permit relates primarily to the measurement of emissions from electric arc furnaces. The EPA requested ATI Flat Rolled Products conduct testing via letter dated March 8, 2019, and ATI Flat Rolled Products completed the testing and issued a report to the EPA on August 6, 2019 that included some requests for variances to the testing methods. We observed that the EPA responded to these requests via letter dated March 25, 2020 by requesting additional information from ATI Flat Rolled Products. While there were several communications thereafter regarding proposed revisions to the testing protocol, it appears that the matter has not yet been resolved as the most recent communication from ATI Flat Rolled Products dated July 12, 2021 requested that the EPA review and approve its latest revision to its testing protocol. ACHD management advised us that the Title V Operating Permit has been drafted in its entirety except for matters pertaining to the emissions from the electric arc furnaces.

RACT

ACHD management has also advised us that reevaluation of reasonably available control technology (RACT) required the ACHD to either re-issue Title V operating permits or issue new installation permits that contain all of the new RACT-related conditions for 12 of the 14 major sources operating in Allegheny County deemed to be major nitrous oxides (NOx) emitting facilities and/or major volatile organic compound (VOC) emitting facilities. (The other two major sources not included were found to be exempt from the RACT requirements.) ACHD management advised us assigning the issuance of these permits the highest priority enabled the ACHD to meet the May 9, 2020 deadline that had been established by the EPA. We were advised by ACHD management that once the deadline had passed, the

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FINDING 20-01 FAILURE TO ISSUE OR DENY TITLE V OPERATING PERMITS WITHIN 18 MONTHS (CONTINUED)

ACHD addressed the issues associated with permits that were subject to appeals and made modifications to issued permits that were otherwise found to be necessary. A lawsuit (to which the ACHD was not a party) has resulted in certain RACT-related permits being subject to reevaluation, and ACHD management has determined that the ACHD will only need to modify and reissue one of its permits as a result of this lawsuit.

Going forward, only a limited amount of personnel resources should need to be allocated to address the recent reevaluation of RACT requirements. However, during 2020 the ACHD was required to utilize significant permitting engineer personnel resources to address the changes in RACT which prevented it from focusing exclusively on reducing the existing Title V operating permit processing backlog.

While the ACHD has not yet fully achieved the recommended Permitting Engineer staffing level and has not yet finalized the development and implemented the use of data gathering and tracking software, ACHD management believes, based on process improvements made and the progress demonstrated to date in reducing the Title V operating permit processing backlog, that the ACHD should be able to eliminate the backlog by December 31, 2022, except where circumstances beyond its control prevent its issuance of permits.

Effect: While it appears that progress is being made, the ACHD is still not fully compliant with Section 503(c) of the Clean Air Act.

The issuance of Title V operating permits to major sources is what triggers the requirement for the major sources to certify at least annually that they are Title V compliant. When Title V permits are not issued timely by ACHD, major sources can avoid providing the certifications. The issuance of Title V operating permits, which

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FINDING 20-01 FAILURE TO ISSUE OR DENY TITLE V OPERATING PERMITS WITHIN 18 MONTHS (CONTINUED)

typically include the compliance requirements contained in any installation and other permits issued, also facilitates compliance monitoring and enforcement. The ACHD can monitor for compliance with installation and other permits issued and take enforcement action when necessary. However, because a number of major sources have been operating without current Title V operating permits, the ACHD air quality engineers charged with compliance monitoring and enforcement may find it more difficult and time-consuming to monitor those major sources and pursue enforcement action.

Recommendations: We recommend that ACHD management continue to take measures to bring ACHD into compliance with the Clean Air Act. This should include:

- Exerting efforts to ensure Title V operating permits are issued (or denied) within the 18-month time parameter established by the Clean Air Act, which involves continuing to address and resolve the backlog of Title V operating permits as specified in the corrective action plan submitted to the EPA in 2018.
- Continuing to put forth efforts to ensure that adequate personnel resources are allocated to permit processing,
- Proceeding with the development and installation of the air quality permitting and enforcement software and taking steps to ensure that its implementation results in the effective tracking of all permits, including ensuring that formal requests for additional information from sources are made timely and that the submission of the information is effectively tracked,

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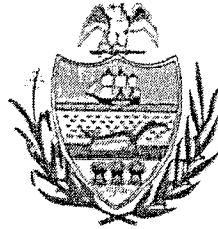
FINDING 20-01 FAILURE TO ISSUE OR DENY TITLE V OPERATING PERMITS WITHIN 18 MONTHS (CONTINUED)

- Maintaining awareness to identify conditions that may be hindering the permit processing workflow and taking advantage of opportunities to implement process improvements, and
- Adhering to a full-time work schedule for the permitting function during the remainder of the COVID-19 pandemic (which could involve work-from-home), to the extent that doing so can be done safely.

Management's
Response:

Management's response begins on page 13.

COUNTY OF



ALLEGHENY

RICH FITZGERALD
COUNTY EXECUTIVE

September 2, 2021

Chelsa Wagner
Controller
County of Allegheny
436 Grant St
Pittsburgh, PA 15219

Dear Ms. Wagner,

Please find attached the Allegheny County Health Department's response to the finding identified in your recent audit of the Title V Air Quality Fund. If you have any questions or need any additional information, please let me know.

Sincerely,

A handwritten signature in cursive script that reads "Debra Bogen".

Dr. Debra Bogen,
Director
Allegheny County Health Department



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Management Response Title V Audit Findings

September 2, 2021

FINDING 20-01: FAILURE TO ISSUE OR DENY TITLE V PERMITS WITHIN 18 MONTHS

ACHD Response:

ACHD appreciates that this audit recognizes improvements made in the Title V operating permit program. Progress has been made to reduce the permit backlog and process improvement changes have been made to ensure all permits (installation and operating) are issued within regulatory and policy deadlines.

Although the audit notes that there are 31 Title V sources, not all are major sources. Four facilities are minor sources subject to Title V requirements due to common control; two other facilities are subject to Title V solely by regulation.

On page 4, a major source is defined as "100 tons per year of any air pollutant". A more complete and accurate definition would be that a major source is 100 tons per year of any criteria pollutant except for volatile organic compounds (oxides of nitrogen, carbon monoxide, oxides of sulfur, or particulate matter), 50 tons per year of volatile organic compounds, 10 tons per year of any single hazardous air pollutant, or 25 tons per year of any combination of hazardous air pollutants.

Operating permit renewals are on a 5-year cycle, so an annual review will not show any improvements that have been made since the previous audit. Page 4 of the report mentions that the 18-month lag is a repeat finding since 2014. This will continue to be a repeat finding until all these permits have gone through their 5-year cycle and are renewed.

ACHD appreciates that this audit recognizes the amount of time and effort that was necessary to address Reasonably Achievable Control Technology (RACT II) permits. A re-evaluation of RACT was required by the EPA for the State of Pennsylvania, including ACHD and AMS (Philadelphia). Pennsylvania was given a deadline of May 9, 2020 to evaluate all major sources of VOC and NOx, perform a full RACT analysis of all processes, and issue all necessary permits. This was the ACHD Permitting section's top priority. Because of the EPA deadline and the need to address the subsequent appeals and amendments, all other Title V work had to be put on hold, necessarily delaying issuance of Title V renewals.

Page 10 of the audit report indicates that without a Title V operating permit, facilities do not have a requirement to certify compliance. It is implied that the lack of this annual certification creates a hinderance to Air Quality Enforcement personnel in determining compliance and/or pursuing enforcement action. However, the demonstration of compliance is not based solely on the annual compliance

certification. Whether under an operating permit or installation permit, a facility must demonstrate compliance with their permit conditions through their semiannual reporting requirements. Furthermore, facilities with an expired Title V operating permit still must submit the annual certification under the existing permit until a renewal permit is issued.

The following bullets address each of the recommendations included in the audit report.

- *Exerting efforts to ensure Title V operating permits are issued (or denied) within the 18-month time parameter established by the Clean Air Act, which involves continuing to address and resolve the backlog of Title V operating permits as specified in the corrective action plan submitted to the EPA in 2018.* – ACHD concurs and is still on target to meet the corrective action plan. As noted in the draft audit report, the Title V operating permit for Alcosan has been through public comment, but ACHD is awaiting a compliance plan that can be incorporated into the permit. Harsco has received their installation permit for an indoor process, and an updated Title V application will be forthcoming. In both cases, the delay in issuing the Title V operating permit will result in greater health benefits for the public despite exceeding the 18-month application processing time.
- *Continuing to put forth efforts to ensure that adequate personnel resources are allocated to permit processing.* – ACHD has received approval to fill the position recently vacated. ACHD is also investigating exploring opportunities to supplement the Permitting staff with at least one more contract employee to remove some of the minor source permitting burden.
- *Proceeding with the planned purchase and installation of the air quality permitting and enforcement software.* – Data integration has already begun for the new system, and the software is on track to be online in early 2022. Regular meetings continue between ACHD and the software developer.
- *Maintaining awareness to identify conditions that may be hindering the permit processing workflow and taking advantage of opportunities to implement process improvements.* – The Permitting program is continuing to develop Quality Improvement projects, as well as attending available training opportunities.
- *Adhering to a full-time work schedule for the permitting function during the remainder of the COVID-19 pandemic (which could involve work-from-home), to the extent that doing so can be done safely.* – The Permitting program never stopped working full-time and was able to successfully operate remotely. The program is now fully back in the office. Certain work practice standards developed during the work-from-home period, such as certified digital signatures on documents and regular TEAMS meetings, continue to be used as they were found to increase efficiency.