

**San Diego County Air Pollution Control District
Title V Operating Permit Program Evaluation**

Final Report

October 11, 2022

Conducted by the

U.S. Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, California 94105

Table of Contents

Acknowledgments	6
Glossary of Acronyms and Abbreviations	7
Executive Summary.....	8
1. Introduction.....	12
Background	12
Title V Program Evaluation at the San Diego County Air Pollution Control District	13
Description of the SDAPCD	14
The EPA’s Findings and Recommendations.....	17
2. Permit Preparation and Content.....	18
2.1 Finding: The SDAPCD has an internal quality assurance process for reviewing draft versions of permits before they are made available for review by the public and the EPA; however, the understanding of the review process is inconsistent between various groups and varies with level of experience.....	18
2.2 Finding: The SDAPCD’s statements of basis do not consistently describe regulatory and policy decisions the District has made in the permitting process.	19
2.3 Finding: The SDAPCD uses template permit documents and maintains template conditions in its database to provide consistency in its permits.	21
2.4 Finding: The SDAPCD does not document whether a requested title V permit modification meets the criteria under which it is submitted, including confirming whether a change is a modification under title I of the CAA.	21
2.5 Finding: The SDAPCD generally references the underlying origin and authority for permit conditions, but often does not reference the origin of New Source Review (NSR) requirements.	22
2.6 Finding: While the SDAPCD appears to streamline applicable requirements in its title V permits, the District generally does not provide the necessary streamlining analysis in the statement of basis.	23
2.7 Finding: The SDAPCD clearly identifies locally enforceable conditions in title V permits.....	24
3. Monitoring.....	25
3.1 Finding: While the SDAPCD generally reviews CAM applicability, internal guidance needs to be updated and staff need training.	25

3.2	Finding: The SDAPCD’s title V permits generally contain monitoring that is sufficient to determine compliance with emissions limits. However, the SDAPCD’s statement of basis does not consistently address periodic monitoring.	26
3.3	Finding: The SDAPCD generally includes sufficient recordkeeping requirements as required by the NSPS and NESHAP regulations.	27
4.	Public Participation and Affected State Review	28
4.1	Finding: San Diego County contains a significant number of linguistically isolated communities for which the SDAPCD does not consistently provide translation services as required by 40 CFR Part 7.35(a).	28
4.2	Finding: The SDAPCD provides public notices of its draft title V permitting actions on its website.	29
4.3	Finding: The SDAPCD provides notification regarding the public’s right to petition the EPA Administrator to object to a title V permit.	30
4.4	Finding: The SDAPCD’s general practice is to conduct a concurrent public and EPA review. If comments are received during the 30-day public review period, the permit package is re-proposed to the EPA for a new 45-day review period.	31
4.5	Finding: The SDAPCD has a Business Assistance Program (BAP) to conduct pre-application meetings with potential sources to help identify the scope of potential permitting projects and the applicability of regulatory requirements.	31
4.6	Finding: The SDAPCD notifies tribes of title V permitting actions.	32
5.	Permit Issuance / Revision / Renewal	33
5.1	Finding: The SDAPCD does not consistently process title V actions in a timely manner, resulting in a permitting backlog.	33
5.2	Finding: The SDAPCD routinely submits proposed and final permit actions to the EPA.	33
5.3	Finding: The SDAPCD has authority to use parallel processing to streamline the issuance of modified NSR and title V permits. However, it is not clear that this processing method is correctly utilized.	34
5.4	Finding: The District does not evaluate the potential emissions from sources without title V permits to determine if they are major sources or whether such sources need synthetic limits to avoid title V applicability or other CAA requirements.	35
6.	Compliance	37
6.1	Finding: The District performs Full Compliance Evaluations (FCEs) of all title V sources on a schedule consistent with its negotiated compliance monitoring strategy (CMS).	37

6.2	Finding: The District’s Compliance Division reviews all title V deviation reports, annual compliance certifications, and semiannual monitoring reports submitted by Part 70 sources.	37
6.3	Finding: When potential compliance issues are discovered, the District addresses them prior to permit issuance. However, the District’s statement of basis could be improved to include compliance history.	38
6.4	Finding: The District uses title V compliance certifications and semiannual monitoring reports to prioritize inspections and initiate enforcement actions.	38
6.5	Finding: Compliance staff have the necessary equipment to perform their job duties but find the procurement process for new equipment to be slow.	39
6.6	Finding: While the SDAPCD has a process in their internal database for compliance staff to request changes to title V permits, it is unclear if it is being used consistently.	39
7.	Resources and Internal Management	41
7.1	Finding: The SDAPCD staff report that they receive effective legal support from the District Counsel’s office.	41
7.2	Finding: The District tracks title V program expenses and revenue and those funds are spent solely to support the title V program.	41
7.3	Finding: The District permitting and compliance management communicate well and meet routinely to discuss programmatic issues. However, the results of these discussions are not clearly and consistently communicated to compliance staff and has resulted in uncertainty regarding outcomes of issue resolution among compliance staff.	42
7.4	Finding: The District lacks a training plan for its permitting and compliance staff.	43
7.5	Finding: Permitting staff demonstrated a general lack of knowledge on environmental justice (EJ) related to permitting and would like the EPA to provide training on this issue.	44
7.6	Finding: The SDAPCD faces staffing challenges, one of the symptoms of which is a permitting backlog, that, with its recent reclassification to a higher nonattainment status, will create additional resource demands on its title V permitting process.	44
8.	Records Management	46
8.1	Finding: The SDAPCD has successfully converted all permitting hard copy files to electronic files and stores historical physical title V permit files in a central records center.	46
8.2	Finding: The SDAPCD has improved its written file retention policy. However, most staff interviewed are not aware of the District’s record retention schedules.	46
8.3	Finding: The SDAPCD uses an electronic database to track title V permits and continues to make database improvements.	47

Appendix A.	Air Pollution Control Agencies in California
Appendix B.	Title V Questionnaire and the SDAPCD Responses.....
Appendix C.	U.S. EPA Statement of Basis Guidance.....
Appendix D.	Map of Linguistically Isolated Households in the SDAPCD.....
Appendix E.	Fee Guidances.....
Appendix F.	SDAPCD Fee Information.....
Appendix G.	SDAPCD Record Retention Schedule.....
Appendix H.	Engineering Division Manual of Operating Procedures
Appendix I.	EPA’s Response to Comments.....
Appendix J.	SDAPCD's Draft Report Response
Appendix K.	Titled Base Salary Compensation Study

Acknowledgments

The EPA Region 9 acknowledges the cooperation of the staff and management of the San Diego County Air Pollution Control District (SDAPCD). We appreciate their willingness to respond to information requests and share their experiences regarding the implementation of the SDAPCD's title V program under the Clean Air Act.

Glossary of Acronyms and Abbreviations

AB	Assembly Bill
Act	Clean Air Act [42 USC Section 7401 et seq.]
ATC	Authority to Construct
CAA	Clean Air Act [42 USC Section 7401 et seq.]
CAM	Compliance Assurance Monitoring
CARB	California Air Resources Board
CFR	Code of Federal Regulations
CMS	Compliance Monitoring Strategy
District	San Diego County Air Pollution Control District
EJ	Environmental Justice
EPA	U.S. Environmental Protection Agency
EPS	Electronic Permit System
FCE	Full Compliance Evaluation
HAP	hazardous air pollutants
NESHAP	National Emission Standards for Hazardous Air Pollutants, 40 CFR Parts 61 & 63
NOV	Notice of Violation
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR Part 60
NSR	New Source Review
NTC	Notice to Comply
OEJ	Office of Environmental Justice
OIG	EPA Office of Inspector General
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
PTO	Permit to Operate
Region	U.S. Environmental Protection Agency Region 9
BAP	Business Assistance Program
SDAPCD	San Diego County Air Pollution Control District
SIP	State Implementation Plan
SOP	Standard Operating Procedure
Team	EPA Region 9 Program Evaluation Team
we	U.S. Environmental Protection Agency

Executive Summary

In response to the recommendations of a 2002 Office of Inspector General (OIG) audit, the U.S. Environmental Protection Agency (EPA or “we”) re-examined the ways it can improve state and local operating permit programs under title V of the Clean Air Act (“title V programs”) and expedite permit issuance. Specifically, the EPA developed an action plan for performing program evaluations of title V programs for each air pollution control agency beginning in fiscal year 2003. The purpose of these program evaluations is to identify good practices, document areas needing improvement, and learn how the EPA can help the permitting agencies improve their performance.

The EPA’s Region 9 (the “Region”) oversees 47 air permitting authorities with title V programs in the Pacific Southwest. Of these, 43 are state or local authorities approved pursuant to 40 CFR part 70 (35 in California, three in Nevada, four in Arizona, and one in Hawaii), referred to as “Part 70” programs. The terms “title V” and “Part 70” are used interchangeably in this report. The Region also oversees a delegated title V permitting program in Navajo Nation under 40 CFR part 71 and title V programs in Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands under 40 CFR part 69, referred to, respectively, as “Part 71” and “Part 69” programs. Because of the significant number of permitting authorities, the Region has committed to performing, on an annual basis, one comprehensive title V program evaluation of a permitting authority with 20 or more title V sources. This approach covers at least 85% of the title V sources within the Region 9 jurisdiction.

The Region initially conducted a title V program evaluation of the San Diego County Air Pollution Control District (SDAPCD or “District”) in 2008 (“2008 Evaluation”).¹ This is the second title V program evaluation the EPA has conducted for the SDAPCD. The EPA Region 9 program evaluation team (“Team”) for this evaluation consisted of the following EPA personnel: Meredith Kurpius, Air and Radiation Division Assistant Director; Gerardo Rios, Manager of the Air Permits Office; Noah Smith, Attorney Advisor; Ken Israels, Program Evaluation Advisor; Sheila Tsai, Program Evaluation Coordinator; Mario Zuniga, SDAPCD Oversight Team Lead; Lisa Beckham, Program Evaluation Team Member; Amber Batchelder, Program Evaluation Team Member; Tina Su, Program Evaluation Team Member; Po-Chieh Ting, Program Evaluation Team Member; Catherine Valladolid, Program Evaluation Team Member; and Camille Cassar, Program Evaluation Team Member.

The program evaluation was conducted in four stages. During the first stage, the Region sent the SDAPCD a questionnaire focusing on title V program implementation in preparation for the interviews (see Appendix B, Title V Questionnaire and SDAPCD Responses). During the second stage, the Team conducted an internal review of the EPA’s own set of SDAPCD permit files. The third stage of the program evaluation was a hybrid site visit, which consisted of Region 9 representatives visiting the SDAPCD office in San Diego, California to conduct interviews of the SDAPCD staff and managers in person and virtually. Because this was a hybrid site visit, some of the interviews were conducted virtually through video conferencing. The site visit took place March 28-30, 2022. Finally, the fourth stage involved follow-up and clarification of issues for completion of the draft report.

¹ San Diego County Air Pollution Control District; Title V Operating Permit Program Evaluation, dated September 30, 2008. See <https://www.epa.gov/sites/default/files/2015-07/documents/sd-finalreport-9302008.pdf>.

We recognize that the District is going through many changes: brand new governance structure, new governing board and leadership, as well as the recent reclassification for ozone from serious to severe. The Region's 2022 evaluation of the SDAPCD's implementation of the Part 70 program concludes that the SDAPCD is implementing a title V program first approved in 2001, but has areas for improvement.

The new District management recognizes this and was already taking steps to improve its implementation of the program prior to this evaluation. For example, title V permitting workload will be distributed more evenly among permitting staff and the District is focusing on a more comprehensive outreach process for its programs, including through the creation of the Office of Environmental Justice (OEJ). A framework for the new Office of Environmental Justice² and Public Participation Plan³ was developed and approved by the new governing board. The SDAPCD is making positive changes and we hope our findings and recommendations will further assist the District in improving its implementation of the program.

Overall, the District's title V permits generally contain sufficient monitoring, recordkeeping, and reporting requirements to determine compliance with emissions limits. The District could use some overall improvement in standardizing and documenting its work processes and permitting decisions in its supporting documents. This would resolve most of the findings we have related to the support document that explains the legal and factual basis for permit conditions (referred to as the "statement of basis"). We also want to emphasize the need for the SDAPCD to evaluate the potential emissions from each facility to accurately determine a source's major source and/or synthetic minor status. We recognize the District is actively working on its backlog and currently lacks sufficient resources, but we also note that the SDAPCD continues to perform full compliance evaluations of all title V sources and reviews all title V deviation, annual, and semiannual reports submitted by Part 70 sources.

Some major findings we want to highlight from our report are listed below:

1. Finding: The SDAPCD's statements of basis do not consistently describe regulatory and policy decisions the District has made in the permitting process. (Finding 2.2)
2. Finding: The SDAPCD does not document whether a requested title V permit modification meets the criteria under which it is submitted, including confirming whether a change is a modification under title I of the CAA. (Finding 2.4)
3. Finding: The SDAPCD provides notification regarding the public's right to petition the EPA Administrator to object to a title V permit. (Finding 4.2)
4. Finding: San Diego County contains a significant number of linguistically isolated communities for which the SDAPCD does not consistently provide translation services as required by 40 CFR Part 7.35(a). (Finding 4.1)

² See https://www.sdapcd.org/content/dam/sdapcd/documents/community/environmental-justice-/APCD%20Office%20of%20Environmental%20Justice_Draft%20Framework.pdf.

³ See <https://www.participatesdapcd.org/About%20the%20Plan/>.

5. Finding: The SDAPCD has a Business Assistance Program (BAP) to conduct pre-application meetings with potential sources to help identify the scope of potential permitting projects and the applicability of regulatory requirements. (Finding 4.5)
6. Finding: The SDAPCD does not consistently process title V actions in a timely manner, resulting in a permitting backlog. (Finding 5.1)
7. Finding: The District does not evaluate the potential emissions from sources without title V permits to determine if they are major sources or whether such sources need synthetic limits to avoid title V applicability or other CAA requirements. (Finding 5.4)
8. Finding: The District performs Full Compliance Evaluations (FCEs) of all title V sources on a schedule consistent with its negotiated compliance monitoring strategy (CMS). (Finding 6.1)
9. Finding: The District tracks title V program expenses and revenue and those funds are spent solely to support the title V program. (Finding 7.2)
10. Finding: The SDAPCD has successfully converted all permitting hard copy files to electronic files and stores historical physical title V permit files in a central records center. (Finding 8.1)

Our report provides a series of findings (in addition to those listed above) and recommendations that should be considered in addressing our findings. As part of the program evaluation process, the SDAPCD has been given an opportunity to review these findings and consider our recommendations.

In addition, our evaluation also considered whether issues found during our 2008 Evaluation have since been addressed. As discussed in Findings 2.3, 4.1, and 4.6, the District has corrected issues related to ensuring permits are signed, publishing public notices in a newspaper of general circulation, and notifying tribal governments of title V permitting actions. As discussed in Findings, 2.4, 6.6, 7.3, and 7.5, the District has not fully addressed issues related to streamlining NSR and title V actions consistent with the title V program, ensuring recommendations from compliance staff to improve permit enforceability are considered in a timely manner, improving communication between permitting and compliance staff, and improving permitting staff's knowledge of environmental justice.

As part of the program evaluation process, the SDAPCD had an opportunity to review these findings and consider our recommendations on July 29, 2022, when we emailed an electronic copy of the draft report to the SDAPCD for comment. We received the SDAPCD's response and comments on August 30, 2022 (see Appendix J). Based on the comments received from the SDAPCD, the EPA made certain changes in the final report. A copy of the Response to Comments and discussion of changes can be found in Appendix I.

To better communicate our recommendations and work together on the recommended improvements, we request an initial kick-off meeting within 90 days of the SDAPCD's receipt of the final report to discuss developing a workplan. A workplan typically includes specific goals and milestones that can be used to demonstrate progress. We commit to meet with the SDAPCD regularly

to discuss progress until both the SDAPCD and the EPA mutually agree the workplan items are sufficiently complete.

1. Introduction

Background

In 2000, the EPA's Office of Inspector General (OIG) initiated an evaluation on the progress that the EPA and state and local agencies were making in issuing title V permits under the Clean Air Act (CAA or the "Act"). The purpose of OIG's evaluation was to identify factors delaying the issuance of title V permits by selected state and local agencies and to identify practices contributing to timely issuance of permits by those same agencies.

After reviewing several selected state and local air pollution control agencies, the OIG issued a report on the progress of title V permit issuance by the EPA and states.⁴ In the report, the OIG concluded that (1) a lack of resources, complex EPA regulations, and conflicting priorities contributed to permit delays; (2) EPA oversight and technical assistance had little impact on issuing title V permits; and (3) state agency management support for the title V program, state agency and industry partnering, and permit writer site visits to facilities contributed to the progress that agencies made in issuing title V operating permits.

The OIG's report provided several recommendations for the EPA to improve title V programs and increase the issuance of title V permits. In response to the OIG's recommendations, the EPA made a commitment in July 2002 to carry out comprehensive title V program evaluations nationwide. The goals of these evaluations are to identify where the EPA's oversight role can be improved, where air pollution control agencies are taking unique approaches that may benefit other agencies, and where local programs need improvement. The EPA's effort to perform title V program evaluations for each air pollution control agency began in fiscal year 2003.

On October 20, 2014, the OIG issued a report, "Enhanced EPA Oversight Needed to Address Risks From Declining Clean Air Act Title V Revenues," that recommended, in part, that the EPA: establish a fee oversight strategy to ensure consistent and timely actions to identify and address violations of 40 CFR part 70; emphasize and require periodic reviews of title V fee revenue and accounting practices in title V program evaluations; and pursue corrective actions, as necessary.⁵

The Region oversees 47 air permitting authorities with title V programs in the Pacific Southwest. Of these, 43 are state or local authorities approved pursuant to 40 CFR part 70 (35 in California, three in Nevada, four in Arizona, and one in Hawaii), referred to as "Part 70" programs. The terms "title V" and "Part 70" are used interchangeably in this report. The Region also oversees a delegated title V permitting program in Navajo Nation under 40 CFR part 71 and title V programs in Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands under 40 CFR part 69, referred to,

⁴ Report No. 2002-P-00008, Office of Inspector General Evaluation Report, "EPA and State Progress In Issuing title V Permits", dated March 29, 2002. See <https://www.epa.gov/sites/production/files/2015-12/documents/titlev.pdf>.

⁵ Report No. 15-P-0006, Office of Inspector General Evaluation Report, "Enhanced EPA Oversight Needed to Address Risks From Declining Clean Air Act Title V Revenues", dated October 20, 2014. See <https://www.epa.gov/sites/production/files/2015-09/documents/20141020-15-p-0006.pdf>.

respectively, as “Part 71” and “Part 69” programs. Because of the significant number of permitting authorities, the Region has committed to performing, on an annual basis, one comprehensive title V program evaluation of a permitting authority with 20 or more title V sources. This approach covers at least 85% of the title V sources within the Region 9 jurisdiction.

Title V Program Evaluation at the San Diego County Air Pollution Control District

This is the second title V program evaluation the EPA has conducted for the SDAPCD. The first title V program evaluation was conducted in 2008. Thus, this evaluation is a follow-up to SDAPCD’s 2008 Evaluation. The EPA Region 9 Team for this evaluation consisted of the following EPA personnel: Meredith Kurpius, Air and Radiation Division Assistant Director; Gerardo Rios, Manager of the Air Permits Office; Noah Smith, Attorney Advisor; Ken Israels, Program Evaluation Advisor; Sheila Tsai, Program Evaluation Coordinator; Mario Zuniga, SDAPCD Oversight Team Lead; Lisa Beckham, Program Evaluation Team Member; Amber Batchelder, Program Evaluation Team Member; Tina Su, Program Evaluation Team Member; Po-Chieh Ting, Program Evaluation Team Member; Catherine Valladolid, Program Evaluation Team Member; and Camille Cassar, Program Evaluation Team Member.

The objectives of the evaluation were to assess how the SDAPCD implements its title V permitting program, evaluate the overall effectiveness of the SDAPCD’s title V program, identify areas of the SDAPCD’s title V program that need improvement, identify areas where the EPA’s oversight role can be improved, and highlight the unique and innovative aspects of the SDAPCD’s program that may be beneficial to transfer to other permitting authorities. The program evaluation was conducted in four stages. In the first stage, the EPA sent the SDAPCD a questionnaire focusing on title V program implementation in preparation for the interviews. (See Appendix B, Title V Questionnaire and SDAPCD Responses.) The Title V Questionnaire was developed by the EPA nationally and covers the following program areas: (1) Title V Permit Preparation and Content; (2) General Permits; (3) Monitoring; (4) Public Participation and Affected State Review; (5) Permit Issuance/Revision/Renewal Processes; (6) Compliance; (7) Resources & Internal Management Support; and (8) Title V Benefits.

During the second stage of the program evaluation, the Region conducted an internal review of the EPA’s SDAPCD title V permit files. The SDAPCD submits title V permits to the Region in accordance with its EPA-approved title V program and the Part 70 regulations.

The third stage of the program evaluation was a hybrid site visit, which consisted of Region 9 representatives visiting the SDAPCD office in San Diego, California to conduct interviews of the SDAPCD staff and managers in person. Because this was a hybrid site visit, some of the interviews were conducted virtually through video conferencing. The purpose of the interviews was to confirm the responses in the completed questionnaire and to ask clarifying questions. The site visit took place March 28-30, 2022.

The fourth stage of the program evaluation was follow-up and clarification of issues for completion of the draft report. The Region compiled and summarized interview notes and asked follow-up questions to clarify the Region’s understanding of various aspects of the SDAPCD’s title V program.

Description of the SDAPCD

The SDAPCD's mission is to "improve air quality to protect public health and the environment." The SDAPCD is currently organized into four divisions: (1) Engineering, (2) Compliance, (3) Monitoring and Technical Services, and (4) Business Support Services. The five offices/sections/programs at the SDAPCD include Office of Environmental Justice (OEJ), Rule Development, Mobile Source Incentive, Information Technology, and Human Resources. Stationary source operating permits, including title V permits, are issued by the Engineering Division. Compliance and enforcement activities, such as facility inspections and preparing enforcement cases are handled by the Compliance Division. Source testing is conducted by the Monitoring and Technical Services Division. The Business Support Services works on the District's budget and the fees and administrative aspects of permitting.⁶ The SDAPCD's office is located in San Diego, California.

Since 1955, the 5-member County of San Diego Board of Supervisors served as the District's governing board, known as the Air Pollution Control Board. As of March 1, 2021, California Assembly Bill (AB) 423 (Gloria, 2019) amended State law to restructure and expand the governing board of the SDAPCD. AB 423 adds specified duties to the District, requires the California Air Resources Board (CARB) to conduct a program audit of the District⁷, separates the SDAPCD from the County governance structure, and requires the appointment of a new 11-member governing board.⁸ With AB 423, the SDAPCD is focusing on a more comprehensive outreach process for its permitting actions and has created the Office of Environmental Justice (OEJ). A framework for the new Office of Environmental Justice⁹ and Public Participation Plan¹⁰ was developed and approved by the new governing board on April 14, 2022. In addition to governing board changes, the SDAPCD recently had several experienced staff retire and selected new senior leadership and a new Air Pollution Control Officer.

In addition to changes in structure and leadership, the workload associated with the SDAPCD's implementation of the title V program is expected to increase. Effective July 2, 2021, the EPA reclassified the San Diego County ozone nonattainment area from "Serious" to "Severe" for the 2008 ozone National Ambient Air Quality Standards (NAAQS) and from "Moderate" to "Severe" for the 2015 ozone NAAQS.¹¹ Upon reclassification, the threshold at which a source is considered a major source under the Part 70 program for emissions of nitrogen oxides (NO_x) and volatile organic compounds (VOC) dropped in San Diego County from 50 tons per year to 25 tons per year. All major stationary sources under part D of the CAA are required to obtain a title V permit and have one year from becoming subject to the title V program to submit an initial title V permit application.¹² Thus, an influx

⁶ See <https://www.sdapcd.org/content/sdapcd/about.html>.

⁷ See <https://ww2.arb.ca.gov/our-work/programs/san-diego-program-review>.

⁸ See <https://www.sdapcd.org/content/sdapcd/about/district-boards/governing-board.html>.

⁹ See https://www.sdapcd.org/content/dam/sdapcd/documents/community/environmental-justice-APCD%20Office%20of%20Environmental%20Justice_Draft%20Framework.pdf.

¹⁰ See <https://www.participatesdapcd.org/About%20the%20Plan/>.

¹¹ See 86 FR 29522 (June 2, 2021).

¹² The EPA should've been more clear in its ozone reclassification notice and issued a notice of deficiency to the District for not adequately administering and enforcing the title V program using the new major source threshold. If the EPA determines a permitting authority is not adequately administering an approved Part 70 program, we will provide

of initial title V applications is expected for those sources newly subject to the title V program in San Diego County.

The EPA granted the SDAPCD's title V program interim approval effective December 7, 1995, and full approval effective November 30, 2001. The EPA also later granted approval of program revisions that were effective on February 27, 2004.¹³ On October 21, 2021, the District submitted additional updates to its title V program that the EPA is currently processing.¹⁴

The Part 70 program generally requires that a permitting authority take final action on each permit application within 18 months after receipt of a complete permit application. Additionally, a permitting authority must take action on an application for a minor modification within 90 days of receipt of an application (or 15 days after the EPA's 45-day review period, whichever is later) and the permitting authority has 60 days to act on requests for administrative permit amendments.¹⁵ The SDAPCD's local rules regarding title V permit issuance contain the same or more stringent timeframes as the Part 70 program.¹⁶

Currently, there are 28 sources in the SDAPCD jurisdiction that are subject to the title V permit program, with the San Diego County's ozone nonattainment area reclassification, the SDAPCD is expecting at least 12 more title V sources.¹⁷ Unlike the conclusion from our 2008 Evaluation, the District does not currently have sufficient permitting resources¹⁸ and is unable to process title V permit applications in a timely manner that results in a title V permit application backlog.¹⁹

SDAPCD's Approach to the Title V Program

Consistent with the other permitting authorities in California, when the EPA approved the SDAPCD's title V operating permit program, the District had already been implementing an operating permit program locally for many years. As a result, the title V program was implemented as an overlay to the District's local permitting program. The existing program requires permits to be issued for individual pieces of equipment. Each Authority to Construct (ATC) permit is issued prior to the construction of the emissions unit and typically contains conditions required for the construction and initial operation. The ATC permit is then converted to a Permit to Operate (PTO) after construction is completed and

notification of the deficiency and, when related to a pollutant in a nonattainment area, apply sanctions as appropriate until the deficiency is resolved. See CAA section 502(i). After the District has an approved program, sources will be required to submit a complete title V permit application to the District within 12 months. The program revisions we are currently processing will clarify which sources must obtain title V permits to resolve this issue. The EPA is also taking steps to ensure this language is clear in any future reclassifications.

¹³ See Appendix A, 40 CFR part 70.

¹⁴ This revision includes updates to the District's definition for major stationary source. Although the District has revised its NSR rules to include the correct major source thresholds, the definition in the District's title V rules still contains an error where the major source threshold for *all* criteria pollutants is identified as 100 tons per year.

¹⁵ See 40 CFR 70.7(a)(2) and 70.7(e)(2)(iv).

¹⁶ See the SDAPCD Rule 1410.

¹⁷ See Finding 5.4 of this report for more discussion on the District's title V source determination.

¹⁸ See Section 7 of this report for more discussion on the SDAPCD's resource management.

¹⁹ See Finding 5.1 of this report for more discussion on the District's title V backlog.

operation of the emissions unit has commenced. During the conversion from ATC to PTO, certain ATC permit conditions are not retained in the PTO if the ATC conditions are determined to be obsolete or irrelevant because they were construction related. Furthermore, because these operating permits are linked to fee payment and renewed annually, new permit conditions can be added or revised each year as applicable. However, these local PTOs do not meet all the requirements for an operating permit required by title V of the CAA.

To implement the title V program, the SDAPCD's title V permits are created by including all the local PTOs and then adding additional sections for facility-wide applicable requirements and title V program-specific conditions such as semi-annual monitoring, annual compliance certifications, deviation reporting, and additional monitoring to assure compliance. The result is that title V sources in SDAPCD have two sets of operating permits with overlapping requirements.

Historically, the SDAPCD only had one title V permit engineer that was assigned all title V permits, and most of the SDAPCD title V permit actions are performed under the conditions of section 502(b)(10) of the CAA (known as a "502(b)(10) change"). When a modification is needed, the general process is that the applicant would submit both an ATC application and a 502(b)(10) change. The ATC/PTO would be issued first, and the 502(b)(10) change would be incorporated later into the title V permit, typically during the renewal.

In our view, to evaluate the SDAPCD's title V program, we must also consider the District's ATC/PTO actions for title V sources because these permit decisions are relied upon to create the District's title V permits and would typically represent title V permit modifications.²⁰ Throughout this report, when we refer to the District's title V program, we are also generally considering the local ATC/PTO actions for title V sources. However, because the SDAPCD uses separate processes for what it considers to be ATC/PTO and title V permit actions, we will refer to the ATC/PTO permit as the "local permit" to make the distinction when necessary.²¹

During our site visit, we learned that the SDAPCD is planning to change how the title V program is being implemented. Title V permits will no longer be written and revised by a single engineer, instead the workload will be distributed across permitting staff and more training will be provided. We acknowledge that the SDAPCD has experienced and is still experiencing many changes; we are conducting our evaluation based on what we learned, and we hope to assist the District in its title V program implementation going forward.

Sections 2 through 8 of this report contain the EPA's findings regarding implementation of the title V permit program by SDAPCD.

²⁰ See Finding 2.4 of this report for more discussion on how the SDAPCD categorize its title V permitting actions.

²¹ This approach also necessarily affects how title V fees are gathered and spent as the title V fees are viewed as being in addition to the fees collected for the pre-title V permitting program. See our fee-related finding in Chapter 7 of this evaluation report.

The EPA's Findings and Recommendations

The following sections include a brief introduction, and a series of findings, discussions, and recommendations. The findings are grouped in the order of the program areas as they appear in the Title V Questionnaire.

The findings and recommendations in this report are based on the District's responses to the Title V Questionnaire, the EPA's internal file reviews, interviews conducted during the March 28-30, 2022 site visit, and follow-up emails and phone calls subsequent to the site visit.

2. Permit Preparation and Content

The purpose of this section is to evaluate the permitting authority's procedures for preparing title V permits. Part 70 outlines the necessary elements of a title V permit application under 40 CFR 70.5, and it specifies the requirements that must be included in each title V permit under 40 CFR 70.6. Title V permits must address all applicable requirements, as well as necessary testing, monitoring, recordkeeping, and reporting requirements sufficient to assure compliance with the terms and conditions of the permit.

2.1 Finding: The SDAPCD has an internal quality assurance process for reviewing draft versions of permits before they are made available for review by the public and the EPA; however, the understanding of the review process is inconsistent between various groups and varies with level of experience.

Discussion: Based on the interviews, we found that all SDAPCD issued permits undergo an internal review process; however, we received inconsistent answers as to who is involved in the review process for local and title V permits. This is mostly likely caused by the separate procedures used for issuing title V and local permits, where, historically, only one staff person processed title V permits. The SDAPCD maintains a Standard Operating Procedure (SOP) on the process for issuing local or title V permits; however, many staff were not aware of the SOP. Our overall understanding is that draft local permits go through a more extensive review process than the draft title V permits. Local draft permits are sent to the senior engineer in the appropriate Engineering Division section for review. Then, the draft local permit is sent to the Compliance Division for review. Senior management does not typically get involved in this review unless an unresolved issue requires attention, or a cursory review is needed. After the internal review is complete, the draft local permit is sent to the permittee for review and comment before it is public noticed. In contrast, the permit review process was less clear when discussing title V permits during interviews. At a minimum, draft title V permits go to the title V permit manager for review. We received inconsistent responses about whether the Compliance Division reviews them or not.

Many pointed out that there has been extensive turnover within the District,²² and communications have not been as effective due to lack of training. There was an even split in response between interviewees regarding whether the Compliance Division reviews the title V permits. Multiple compliance staff also mentioned they have stopped sending comments to the Engineering Division after repeatedly not seeing feedback being incorporated into permits.²³

Recommendation: The EPA acknowledges that the SDAPCD recently changed how it processes title V permits, and many processes and responsibilities are still in transition. As part of the transition, the SDAPCD should document the procedure of its quality assurance process and provide staff training so the process can be implemented consistently. The EPA suggests that

²² See Finding 7.6 of this report for more discussion on employee retention.

²³ See Finding 6.6 of this report for more discussion on compliance permit feedback process.

the comprehensive process used for local permits should serve as a starting point for title V permits and that the process address how feedback generated in the internal and permittee review processes are to be considered.

- 2.2 Finding:** The SDAPCD's statements of basis do not consistently describe regulatory and policy decisions the District has made in the permitting process.

Discussion: 40 CFR part 70.7(a)(5) requires the District to provide "a statement that sets forth the legal and factual basis for the draft permit conditions" and is commonly referred to as the "statement of basis". The purpose of this requirement is to provide the public and the EPA with the District's rationale on applicability determinations and technical issues supporting the issuance of proposed title V permits. A statement of basis documents the regulatory and policy issues applicable to the source and is an essential tool for conducting meaningful permit review.

The EPA has issued guidance on the required content of statement of basis on several occasions, most recently in 2014.²⁴ This guidance has consistently explained the need for permitting authorities to develop a statement of basis with sufficient detail to document the decisions made in the permitting process. The EPA provided an overview of this guidance in a 2006 title V petition order, *In the Matter of Onyx Environmental Services*, Order on Petition No. V-2005-1 (February 1, 2006) (*Onyx Order*). In the *Onyx Order*, in the context of a general overview statement on the statement of basis, the EPA explained:

A statement of basis must describe the origin or basis of each permit condition or exemption. However, it is more than just a short form of the permit. It should highlight elements that U.S. EPA and the public would find important to review. Rather than restating the permit, it should list anything that deviates from simply a straight recitation of applicable requirements. The statement of basis should highlight items such as the permit shield, streamlined conditions, or any monitoring that is required under 40 C.F.R. § 70.6(a)(3)(i)(B). Thus, it should include a discussion of the decision-making that went into the development of the title V permit and provide the permitting authority, the public, and U.S. EPA a record of the applicability and technical issues surrounding the issuance of the permit. (Footnotes omitted.) See, e.g., In RePort Hudson Operations, Georgia Pacific, Petition No. 6-03-01, at pages 37-40 (May 9, 2003) ("Georgia Pacific"); In Re Doe Run Company Buick Mill and Mine, Petition No. VII-1999-001, at pages 24-25 (July 31, 2002) ("Doe Run"); In Re Fort James Camas Mill, Petition No. X-1999-1, at page 8 (December 22, 2000) ("Ft. James").

Onyx Order at 13-14. Appendix C of this report contains a summary of the EPA guidance to date on the suggested elements to be included in a statement of basis.

²⁴ Memorandum from Stephen D. Page, Director of the Office of Air Quality Planning and Standards, "Implementation Guidance on Annual Compliance Certification Reporting and Statement of Basis Requirements for Title V Permits," April 30, 2014. See <https://www.epa.gov/sites/production/files/2015-08/documents/20140430.pdf>.

In our review, we found that the statement of basis prepared by the District often does not adequately describe the regulatory and policy issues or document the decisions the District made in the permitting process. Though there is variation, the District's statement of basis generally includes: Introduction/Description; Title V Applicability; Applicable Requirements; Monitoring, Record-keeping, and Reporting; Public Notice and EPA Review; and Conclusions/Recommendations. While these are the types of categories often found in the statement of basis for a title V permit, the District does not consistently include the type of detailed, site-specific information needed in these sections that would allow the reader to understand the District's legal and factual basis for the terms and conditions in the permit.

For example, the District often includes a list of applicable requirements but does not always explain why the source is subject to the requirements or whether an otherwise potentially applicable requirement is not applicable in a particular case. The District could improve this section by consistently explaining why the source meets the appropriate applicability criteria. The section should also not be limited to New Source Performance Standards (NSPS) or National Emission Standards for Hazardous Air Pollutants (NESHAP) but should also include the applicability of all federal applicable requirements, including Compliance Assurance Monitoring (CAM), the Prevention of Significant Deterioration (PSD) permit program at 40 CFR 52.21²⁵, the title IV Acid Rain Program, and State Implementation Plan (SIP)-approved rules.

In addition, the sections dedicated to background and introductory information could be improved by including a description of the various processes and operations at the source, relevant historical information, and the current type of permitting action. While the statement of basis generically describes the changes being made to the permit, the District could improve by providing more context. It should be clear to the reader why the permit needs to be revised and that the revisions the District is making are appropriate for the situation. The District could also consider including a redline/strikethrough version of the permit revisions as part of the permit record provided during the public participation process to facilitate permit review. Furthermore, when streamlining multiple applicable requirements, the statement of basis must explain the requirements being streamlined and how the permit conditions assure compliance.²⁶

Recommendation: As required by the Part 70 program, the SDAPCD must consistently produce a statement of basis for each title V permit action (initial permits, renewals, and significant and minor revisions) and should commit to improving the content of this document for future permitting actions. We encourage the SDAPCD to work in close coordination with the EPA to ensure that the statement of basis is adequate for explaining the legal and factual basis of each action as required by 40 CFR 70.7(a)(5). If the engineering evaluations for local permits contain applicable analysis for the source's title V permit, then these evaluations should be included in the package sent to the EPA for its title V permit review.

²⁵ While the SDAPCD does not have an EPA-approved PSD program, PSD remains a potential applicable requirement to title V sources in SDAPCD. Any EPA-issued PSD permits must be incorporated into the District's title V permits.

²⁶ See Finding 2.7 of this report for more discussion on the SDAPCD streamlining evaluation.

2.3 Finding: The SDAPCD uses template permit documents and maintains template conditions in its database to provide consistency in its permits.

Discussion: From staff interviews, most permit engineers refer to previous permitting actions to ensure consistency between permitting documents, especially for the statement of basis.²⁷ The SDAPCD also maintains a list of template permit conditions within its permitting database to assist in permit language consistency.²⁸

The SDAPCD's template title V permit includes a cover page with the Source's general information, responsible official, and signature from an appropriate District official. The template title V permit is divided into six sections: Preamble, Regulation XIV Permit Requirements, Facility-Wide Requirements, Emission Unit Requirements, District-Only Provisions, and Appendices. During the 2008 Evaluation, the SDAPCD's title V permits were not signed by an appropriate District official. The District's title V permit template now includes a District official signature, and the District appears to have resolved its signature issue.

Recommendation: We commend the SDAPCD for promoting consistency between its permit documents using templates. We encourage the SDAPCD to continue improving the statement of basis as discussed in Finding 2.2.

2.4 Finding: The SDAPCD does not document whether a requested title V permit modification meets the criteria under which it is submitted, including confirming whether a change is a modification under title I of the CAA.

Discussion: When changes are made to a Part 70 source, there are several options for the method that must be used to incorporate the change into the title V permit under the Part 70 and District regulations. The District has developed an internal guidance document that defines the criteria to classify the different title V permit revision types and specifies the steps to follow to determine the appropriate revision track. The guidance also describes the type of supporting documentation that should accompany each type of permit revision. This guidance document was provided to the EPA during the file review and should serve as a good resource for the SDAPCD staff to understand the criteria for classifying title V revisions and to provide consistent processing of title V permit changes.

During our file review, we requested 5 years of permit files for the various types of permit modifications (significant modifications, minor permit modifications, administrative amendments, and off-permit changes/502(b)(10) changes). In reviewing these files, we discovered the District consistently does not document whether the type of permit modification requested is correct.

²⁷ See Finding 2.2 of this report for more discussion of the SDAPCD's statement of basis.

²⁸ See Finding 8.3 of this report for more discussion of the SDAPCD permitting database.

Importantly, the District does not document whether 502(b)(10) changes and minor permit modifications are not modifications under title I of the Act, a minimum requirement for using these options. Further, such determinations should include consideration of the PSD program at 40 CFR 52.21 that is implemented by the EPA within San Diego County. The District's rule that references "PSD" requirements, Rule 20.3, is not an EPA-approved PSD program and does not use the correct PSD applicability criteria.

Permitting authorities are not required to produce a statement of basis when processing a 502(b)(10) change; however, we believe it would be beneficial for the SDAPCD to document its analysis verifying that a requested operational change qualifies as a 502(b)(10) change. Otherwise, the regulated community is encouraged to avoid title V program requirements, and potentially title I requirements, by submitting every action as a 502(b)(10) change. We also note that files pertaining to 502(b)(10) changes did not document that the requested changes were eventually incorporated into the title V permit at the time of the next renewal, nor did the District respond when title V sources requested notification whether their changes qualified as 502(b)(10) changes.

Due to the lack of documentation, the EPA was unable to fully assess the SDAPCD staff's understanding of the various permit revision tracks and could not verify whether applications for permit modifications were categorized and processed correctly pursuant to District and federal regulations. When these types of decisions are not consistently documented it can lead to inconsistent implementation of the title V program.

Further, during our 2008 Evaluation we found that the District "streamlines" its NSR and title V actions but did not consistently follow its own rules in doing so by ensuring adequate EPA and public review of NSR actions added to the title V permit.²⁹ It is unclear whether in lieu of using the appropriate procedures in its rules, the District is now instead determining all changes at title V sources qualify as 502(b)(10) changes. See Finding 5.3.

Recommendation: To ensure permitting staff accurately categorize title V permit actions, the SDAPCD should document its actions, rationale, and justification for each title V permit action. The EPA strongly recommends that the SDAPCD consistently review and document whether submitted 502(b)(10) changes qualify for this option, including whether such changes are title I modifications. Since the District is not the PSD permitting authority in San Diego County, the District should also be coordinating with the EPA on whether new sources or modifications at existing major sources are subject to the PSD program when conducting this analysis.

2.5 Finding: The SDAPCD generally references the underlying origin and authority for permit conditions, but often does not reference the origin of New Source Review (NSR) requirements.

Discussion: Each title V permit is required to specify and reference the origin and authority for each term or condition and identify any difference in form as compared to the applicable

²⁹ See Finding 5.2 in the 2008 Evaluation.

requirement upon which the term or condition is based.³⁰ In most cases, the origin and authority for a permit condition can be referenced by citing to the particular rule or regulation. The District consistently cites a basis for each permit condition; however, its practice of only citing to “NSR” for NSR requirements is insufficient. It is also unclear whether the District incorporates requirements from the District’s ATC’s into the title V permit. Conditions from ATCs remain federal applicable requirements under the California SIP regardless of their inclusion in the PTO.³¹

For NSR requirements, the *authority* for the permit condition stems from the SIP-approved NSR rule. But, because NSR rules likely do not specify the emissions limits and associated monitoring, recordkeeping, and reporting requirements to which the source is subject to under the NSR determination, the *origin* of the title V permit condition is the actual NSR permit issued to the source. Thus, requirements stemming from NSR rules, or the PSD program at 40 CFR 52.21, should generally cite the underlying rule or regulation as the authority and the specific NSR permit action as the origin.

Recommendation: To address this finding, the District must develop a plan to revise its title V permits to assure that each permit cites the appropriate NSR/PSD permits as part of the origin and authority for a permit term or condition as required by 40 CFR 70.6(a)(1)(i).

- 2.6 Finding:** While the SDAPCD appears to streamline applicable requirements in its title V permits, the District generally does not provide the necessary streamlining analysis in the statement of basis.

Discussion: The SDAPCD’s title V permits appear to contain streamlined requirements in which one or more federal/local requirements are subsumed under the most stringent requirement that applies to an emissions unit. For example, the requirements from the NSPS and the same or more stringent District rule requirements are sometimes streamlined into a single permit condition. The District’s statement of basis will sometimes state that the streamlined permit condition is at least as stringent as the subsumed requirements. However, such a blanket statement does not actually demonstrate that the requirement was accurately streamlined.

Streamlining applicable requirements is an acceptable practice but must be appropriately documented to assure compliance with all requirements. The EPA most recently provided guidance on streamlining in 2014 in the EPA’s April 30, 2014 memorandum, “Implementation Guidance on Annual Compliance Certification Reporting and Statement of Basis Requirements for Title V Operating Permits.” The EPA initially provided guidance in our March 5, 1996 guidance document, “White Paper Number 2 for Improved Implementation of The Part 70 Operating Permit Program.”³²

³⁰ See 40 CFR 70.6(a)(1)(i).

³¹ While some ATC requirements not included in the PTO may also not be appropriate for inclusion in the title V permit, this determination should be documented in the statement of basis.

³² See Appendix C of this report.

The permit condition should cite to the requirement included in the permit and any subsumed requirements. In addition, the statement of basis should document how the permit condition assures compliance with all subsumed requirements.

Recommendation: As required by 40 CFR 70.7(a)(5), if the District wishes to continue its practice of creating streamlined title V permit conditions, the District must revise its practice by ensuring the statement of basis provides the legal and factual basis for the permit conditions by demonstrating that the permit conditions assure compliance with all subsumed requirements. We further recommend that the District follow the EPA guidance provided above in developing a process to appropriately streamline applicable requirements.

2.7 Finding: The SDAPCD clearly identifies locally enforceable conditions in title V permits.

Discussion: Permit conditions based on state or local rules are only federal applicable requirements if the rule has been approved by the EPA into the California SIP. Some state and local rules are only adopted at the local level and have not been, or will not be, approved into the SIP. State or local rules not approved into the SIP are not federal applicable requirements under the title V program and are only enforceable at the State or District level. During the file review, we found that the District's equipment-specific permits to operate were divided into two main sections: "Federally-Enforceable and District-Enforceable Conditions" and "District-Only Enforceable Conditions." In creating these sections, the District clearly indicates the enforceability of all permit conditions.

However, we note that the District's local permits program is part of the California SIP and permits issued pursuant to these rules are federal applicable requirements (except for certain requirements, such as state or local air toxics requirements).

Recommendation: The EPA commends the SDAPCD for identifying which conditions are federally and locally enforceable in their title V permits. The District should continue this labelling practice and ensure ATC and PTO requirements remain federal applicable requirements.

3. Monitoring

The purpose of this section is to evaluate the permitting authority's procedures for meeting title V monitoring requirements. Part 70 requires title V permits to include monitoring and related recordkeeping and reporting requirements. See 40 CFR 70.6(a)(3). Each permit must contain monitoring and analytical procedures or test methods as required by applicable monitoring and testing requirements. Where the applicable requirement itself does not require periodic testing or monitoring, the permitting authority must supplement the permit with periodic monitoring sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit. As necessary, permitting authorities must also include in title V permits requirements concerning the use, maintenance, and, where appropriate, installation of monitoring equipment or methods.

Title V permits must also contain recordkeeping for required monitoring and must require that each title V source record all required monitoring data and supporting information and retain such records for a period of at least five years from the date the monitoring sample, measurement, report, or application was made. With respect to reporting, permits must include all applicable reporting requirements and require (1) submittal of reports of any required monitoring at least every six months and (2) prompt reporting of any deviations from permit requirements. All required reports must be certified by a responsible official consistent with the requirements of 40 CFR 70.5(d).

In addition to periodic monitoring, permitting authorities are required to evaluate the applicability of Compliance Assurance Monitoring (CAM), and include CAM provisions and a CAM plan into a title V permit when applicable. CAM applicability determinations are required either at permit renewal, or upon the submittal of an application for a significant title V permit modification. CAM regulations require a source to develop parametric monitoring for certain emissions units with control devices, which may be required in addition to any periodic monitoring, to assure compliance with applicable requirements.

3.1 Finding: While the SDAPCD generally reviews CAM applicability, internal guidance needs to be updated and staff need training.

Discussion: CAM regulations, found at 40 CFR part 64, apply to title V sources with large emissions units that rely on add-on control devices to comply with applicable requirements. The underlying principle, as stated in the preamble to our 1997 rulemaking, is "to assure that the control measures, once installed or otherwise employed, are properly operated and maintained so that they do not deteriorate to the point where the owner or operator fails to remain in compliance with applicable requirements."³³ Per CAM regulations, sources are responsible for proposing a CAM plan to the permitting authority that provides a reasonable assurance of compliance with applicable requirements for pollutant-specific emissions units with add-on control devices.

³³ 62 FR 54902, October 22, 1997.

The District reported that there are currently no facilities in its jurisdiction that are subject to the CAM rule. In the permits we reviewed, we found that the District generally explains CAM applicability in its statement of basis. However, CAM applicability can evolve over time as a source makes changes, and thus its applicability should be confirmed during title V renewals and significant modifications to ensure ongoing compliance. During our interviews, we found that permitting staff do not have experience determining CAM applicability. In addition, internal guidance documents may not interpret CAM applicability requirements correctly, as the guidance is too generalized to ensure criteria in the CAM rule is followed. For example, internal guidance appears to incorrectly imply that emissions limits with existing monitoring are not subject to CAM or that being subject to an emissions standard exempt from CAM means that other standards for the same pollutant/unit are also exempt from CAM.

Recommendation: The SDAPCD should continue to review CAM requirements as it processes permit renewals and significant modifications and ensure CAM applicability is consistently reviewed and discussed in the statement of basis. Additionally, CAM training should be provided for permitting staff, and the District's internal guidance should be updated to provide more detailed information for determining applicability based on the criteria in the CAM rule.

- 3.2 Finding:** The SDAPCD's title V permits generally contain monitoring that is sufficient to determine compliance with emissions limits. However, the SDAPCD's statement of basis does not consistently address periodic monitoring.

Discussion: Our file review confirmed that the SDAPCD's title V permits generally contain appropriate monitoring provisions. Many of the applicable requirements incorporated into the District's title V permits already contain sufficient monitoring (such as, NSR permit conditions, SIP-approved rules, NSPS/NESHAP and use of CEMS for large combustion sources). Source testing, parametric monitoring of control device operation, and associated recordkeeping are used to assure compliance with emissions limits. During our file review, we discovered some permits contained daily emissions limits, but did not appear to contain corresponding daily monitoring/recordkeeping requirements to assure compliance, or the wording of such limits was too vague to determine whether the emissions limits were daily limits or a monthly average.

The SDAPCD does not specifically address in the statement of basis whether additional periodic monitoring is needed. While many applicable requirements may already contain sufficient monitoring, the District does not document whether additional periodic monitoring is, or is not, needed to assure compliance. The EPA has issued guidance that reinforces the need to address periodic monitoring in the statement of basis. Additionally, an Order responding to a petition to the EPA to object to the proposed title V permit for the Chevron Products Company in Richmond, California, dated March 15, 2005, directed the permitting authority to reopen the permit to include either periodic monitoring requirements to assure compliance with

regulations or to provide adequate justification in the statement of basis explaining why no periodic monitoring is required.³⁴

Recommendation: The SDAPCD should continue to ensure that all title V permits have monitoring sufficient to determine compliance, including ensuring daily emissions limits have monitoring conducted on at least a daily basis. Additionally, the statement of basis should evaluate the need for adding periodic monitoring when sufficient monitoring is not specified by an underlying applicable requirement. We recommend the District develop a plan to incorporate review of periodic monitoring for each title V facility.

3.3 Finding: The SDAPCD generally includes sufficient recordkeeping requirements as required by the NSPS and NESHAP regulations.

Discussion: During the EPA’s review, we found the SDAPCD generally includes sufficient recordkeeping requirements as required by the NSPS and NESHAP regulations. A specific and prevalent exception pertains to recordkeeping for determining compliance with diesel fuel standards in NSPS Subpart IIII and NESHAP Subpart ZZZZ. The SDAPCD generally does not include a recordkeeping requirement in its title V permits to ensure sources only purchase EPA-compliant diesel fuel as required by these standards. Maintaining fuel purchase records is a standard practice to ensure non-compliant fuels are not entering the market.³⁵ After completion of our fieldwork, the District subsequently provided an example of this recordkeeping requirement in a permit.

However, as discussed in Finding 2.2, because the statement of basis does not consistently document permitting decisions, we found it challenging to determine whether a permit has incorporated all the applicable monitoring and recordkeeping requirements.³⁶ An applicable requirement may have more than one compliance method and the statement of basis should make clear how the SDAPCD determined the appropriate requirements to incorporate. During our interviews, compliance staff also mentioned they sometimes see enforceability issues in permits while conducting inspections related to monitoring and recordkeeping. See Finding 6.6.

Recommendation: The EPA commends the SDAPCD for including sufficient recordkeeping requirements as required by the NSPS and NESHAP regulations. For the exception noted above, during permit renewals, the District should update their title V permits to require records to assure that only EPA-compliant diesel fuel has been purchased.

³⁴ This document is available in the Title V petition database on the EPA website at https://www.epa.gov/sites/default/files/2015-08/documents/chevron_cbe_decision2004.pdf.

³⁵ Records that EPA-compliant diesel fuel was purchased ensures that the fuel meets the sulfur content, cetane index, or aromatic content of 40 CFR 80.510, as required by NSPS IIII and NESHAP ZZZZ.

³⁶ We did, however, find an example where the District incorrectly used the concept of a “replacement unit” to determine NSPS/NESHAP applicability. The District incorrectly determined that replacement of an existing engine with a new engine meant that, despite being a new engine, the NSPS did not apply. While the NSR program may have special provisions for replacement units, those provisions cannot be used to determine NSPS/NESHAP applicability.

4. Public Participation and Affected State Review

This section examines the SDAPCD procedures used to meet public participation requirements for title V permit issuance. The federal title V public participation requirements are found in 40 CFR 70.7(h). Title V public participation procedures apply to initial permit issuance, significant permit modifications, and permit renewals. The SDAPCD public participation procedures must provide for public notice, including an opportunity for public comment and public hearing on the draft initial permit, permit modification, or permit renewal. Draft permit actions must be noticed in a newspaper of general circulation or a state publication designed to give general public notice; sent to affected states; sent to persons on a mailing list developed by the permitting authority; sent to those persons that have requested in writing to be on the mailing list; and provided by other means as necessary to assure adequate notice to the affected public.

The public notice must, at a minimum: identify the affected source; the name and address of the permitting authority processing the permit; the activity or activities involved in the permit action; the emissions change involved in any permit modification; the name, address, and telephone number of a person from whom interested persons may obtain additional information, including copies of the draft permit, the application, all relevant supporting materials, and all other materials available to the permitting authority that are relevant to the permit decision; a brief description of the required comment procedures; and the time and place of any hearing that may be held, including procedures to request a hearing. See 40 CFR 70.7(h)(2).

The permitting authority must keep a record of the public comments and of the issues raised during the public participation process so that the EPA may fulfill its obligation under section 505(b)(2) of the Act to determine whether a citizen petition may be granted. The public petition process, 40 CFR 70.8(d), allows any person who has objected to permit issuance during the public comment period to petition the EPA to object to a title V permit if the EPA does not object to the permit in writing as provided under 40 CFR 70.8(c). Public petitions to object to a title V permit must be submitted to the EPA within 60 days after the expiration of the EPA 45-day review period. Any petition submitted to the EPA must be based only on objections that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period.

4.1 Finding: San Diego County contains a significant number of linguistically isolated communities for which the SDAPCD does not consistently provide translation services as required by 40 CFR Part 7.35(a).

Discussion: The SDAPCD's jurisdiction includes sources located throughout San Diego County. In response to California's AB 617 legislation, the District has increased its use of translations and public outreach in certain communities.³⁷ In addition, the District has created an EJ outreach position that is designed to carry out the outreach effort to EJ communities. The EPA prepared

³⁷ This effort is known as the Community Air Protection Program. For a description of the District's response to AB 617, please see <https://www.sdapcd.org/content/sdapcd/community/community-air-protection-program.html>.

a map of linguistically isolated communities within the SDAPCD's jurisdiction in which title V permits have been or may be issued (see Appendix D). The EPA's map indicates that there are numerous populations that are linguistically isolated. These linguistically isolated communities have a significant population density, and thus the SDAPCD should provide translation services in those communities during the title V permitting process. Section 502(b)(3)(C)(6) of the Act and 40 CFR 70.7(h) require a Part 70 program to have adequate procedures for public notice. Using a map like that found in Appendix D may provide additional opportunities to direct the SDAPCD's translation efforts.³⁸

Further, please see 40 CFR Part 7.35(a) for additional detail regarding federal grantee obligations in demonstrating compliance with title 6 of the Civil Rights Act of 1964. In addition, see Appendix D of this report that includes a copy of a recent preliminary decision regarding this topic dated March 30, 2021 from the EPA's External Civil Rights Compliance Office to Carol S. Cromer, Director, Missouri Department of Natural Resources.

Recommendation: The SDAPCD should provide translation services for linguistically isolated communities within its jurisdiction. The SDAPCD should consider directing translation efforts by using mapping tools as appropriate to assure updated information.

4.2 Finding: The SDAPCD provides public notices of its draft title V permitting actions on its website.

Discussion: A permitting authority's website is a powerful tool to make title V information available to the general public. Easy access to information that is useful for the public review process can result in a more informed public and, consequently, provide more meaningful comments during title V permit public comment periods.

Currently, the SDAPCD posts relevant title V permit information on its website including, but not limited to, proposed title V permits, statement of basis, public notices, permit appeal procedures, and general title V information and guidance.

The District website provides general information to the public and regulated community regarding the SDAPCD permitting program.³⁹ The public can find information regarding the permitting process, whether a permit is needed for an operation, how to obtain a permit, application forms, and information about related programs that inform the District's permitting program.

³⁸ The use of the State of California's environmental justice tool CalEnviroScreen may also assist in learning where best to deploy translation resources.

³⁹ See <https://www.sdapcd.org/content/sdapcd/permits.html> and <https://www.sdapcd.org/content/sdapcd/permits/equipment-types/titlev.html>

The SDAPCD's website also provides a list of active projects that are in the public comment period along with the corresponding draft permit, statement of basis, and public notice that includes information on how to comment electronically or by mail.⁴⁰

The SDAPCD maintains electronic mailing lists for title V public notices and for notification of affected states. Members of the public may sign up for the title V public notice mailing list on the District's website. However, as discussed in Finding 4.1, the District does not currently translate notices of proposed title V permit actions in languages other than English as required by 40 CFR Part 7.35(a). As stated in the introduction, the SDAPCD is developing strategies to enhance public engagement as part of its AB423 commitment.

Finally, in our 2008 Evaluation, we found that the District had been publishing notices of its proposed permits in a newspaper, of which circulation was almost solely among the business community. The District has addressed this issue by publishing its notices of proposed permits in the San Diego Union-Tribune, a newspaper of general circulation.

Recommendation: We encourage the SDAPCD to continue providing information related to title V permits to the public via their website and notifying affected states and interested parties of relevant title V permitting actions via District electronic mailing lists. We also recommend that the District provide all final title V permits to the public on its website. In addition, the district should provide translations of notices consistent with the discussion in Finding 4.1.

4.3 Finding: The SDAPCD provides notification regarding the public's right to petition the EPA Administrator to object to a title V permit.

Discussion: 40 CFR 70.8(d) provides that any person may petition the EPA Administrator, within 60 days of the expiration of the EPA's 45-day review period, to object to the issuance of a title V permit. The petition must be based only on objections that were raised with reasonable specificity during the public comment period.⁴¹

San Diego County Rule 1425 contains the required information about the public's right to petition the EPA Administrator to object to a title V permit. In 2008, we made a finding that the District was not informing the public of their right to petition when public noticing title V permitting actions.⁴² In our review of the District's draft permit packages for the last five years, including the public notice for the permit action, we found that the District did not inform the public of the right to petition the EPA Administrator to object to a title V permit at the time of the site visit in March. However, the District has recently updated its practice and in the latest public notice, from April 21, 2022, there is new language that incorporates the public petition details.

⁴⁰ <https://www.sdapcd.org/content/sdapcd/permits/public-notices.html>

⁴¹ An exception applies when the petitioner demonstrates that it was impracticable to raise those objections during the public comment period or that the grounds for objection arose after that period.

⁴² See 2008 Evaluation, Finding 4.5.

Recommendation: The EPA commends the SDAPCD for revising its public notice templates to inform the public of the right to petition the EPA Administrator to object to the issuance of a title V permit. The District should have written internal procedures that ensure this remains an ongoing practice.

- 4.4 Finding:** The SDAPCD’s general practice is to conduct a concurrent public and EPA review. If comments are received during the 30-day public review period, the permit package is re-proposed to the EPA for a new 45-day review period.

Discussion: Per section 505(b) of the CAA and 40 CFR 70.8, state and local permitting agencies are required to provide proposed title V permits to the EPA for a 45-day period during which the EPA may object to permit issuance. The EPA regulations allow the 45-day EPA review period to occur either following the 30-day public comment period (i.e., sequentially), or at the same time as the public comment period (i.e., concurrently). When the public and the EPA review periods occur sequentially, permitting agencies will make the draft permit available for public comment, and following the close of public comment, provide the proposed permit and supporting documents to the EPA.⁴³ When the public and the EPA review periods occur concurrently, a state or local agency will provide the EPA with the draft permit and supporting documents at the beginning of the public comment period. As specified in 40 CFR 70.8 and per SDAPCD’s internal guidance, if the SDAPCD receives comments from the public during the 30-day public review period, the 45-day EPA review would be restarted to allow the SDAPCD to prepare responses to the public comments, and an updated permit and Statement of Basis, if applicable, to the EPA. As the permit actions reviewed did not contain public comments, the EPA was unable to confirm this process is being consistently followed at the District. However, the procedures for concurrent public comment and response to comments are well documented in internal District guidance and SOPs.

Recommendation: We commend the SDAPCD for having internal guidance that is consistent with the requirements of the title V program and EPA guidance, and encourage the District follow its guidance when public comments are received.

- 4.5 Finding:** The SDAPCD has a Business Assistance Program (BAP) to conduct pre-application meetings with potential sources to help identify the scope of potential permitting projects and the applicability of regulatory requirements.

Discussion: Under section 507 of the CAA, permitting authorities are required to implement a small business assistance program to assist small businesses that need title V permits.

⁴³ Per 40 CFR 70.2, “draft permit” is the version of a permit for which the permitting authority offers public participation or affected State review. Per 40 CFR 70.2, “proposed permit” is the version of a permit that the permitting authority proposes to issue and forwards to the EPA for review. In many cases these versions will be identical; however, in instances where the permitting agency makes edits or modifications as a result of public comments, there may be material differences between the draft and proposed permit.

During this evaluation, we found that the District has a full BAP to provide assistance to business owners and operators, small and large, in determining which county, state, and federal requirements are applicable. The assistance includes coverage of title V small businesses.

During the interviews, the BAP staff stated that they help small businesses draft permit applications and review permits to ensure permit records adequately represent the source. This helps the Permitting staff process permit applications in a timely fashion. The BAP staff also assist small businesses with compliance demonstrations by conducting mock on-site inspections and by reviewing the source's draft Annual Emissions Reports to ensure they are adequate before the reports are submitted to the Compliance and Enforcement Section.

Additionally, the BAP staff helps small businesses with pollution prevention by providing guidance on control technologies. For example, they help gas stations understand the benefits of Stage II vapor controls. The District has a BAP website where they describe who they are and provide forms, calculation sheets, and other information to aid businesses developing permit applications. Furthermore, the website has a notification feature available for small businesses in case they want to be made aware when new content is posted on the BAP website.⁴⁴

Discussions with the BAP staff also indicated that work related to title V sources is tracked so that time spent working with these sources is appropriately accounted for in tracking title V fees and revenue.

Recommendation: The EPA commends the District for its efforts to provide assistance to small businesses and recommends the District continue supporting small businesses by providing these services through its BAP.

4.6 Finding: The SDAPCD notifies tribes of title V permitting actions.

Discussion: During our 2008 Evaluation, we did not find evidence that the District notified any tribes in San Diego County regarding title V permit actions. During this evaluation, we found that this issue has been resolved as the District provides notifications to all tribes in San Diego County. Of the 18 Indian reservations in San Diego County, two tribes have been approved by the EPA to be treated in the same manner as a neighboring state for the purpose of "affected state" notification under section 505(a)(2) of the CAA.⁴⁵ Regardless of the affected state status, the EPA believes that state and local air agencies should notify tribal governments when taking significant actions that may affect their air quality.

Recommendation: We commend the SDAPCD for notifying tribes and affected states.

⁴⁴ See <https://www.sdapcd.org/content/sdapcd/compliance/business-assistance.html>.

⁴⁵ Additionally, the EPA maintains a map on its website of tribes in Region 9 that have received treatment as a state status for purposes of section 505(a)(2) of the CAA: <https://www.epa.gov/caa-permitting/affected-states-notifications-region-9>.

5. Permit Issuance / Revision / Renewal

This section focuses on the permitting authority's progress in issuing initial title V permits and the District's ability to issue timely permit renewals and revisions consistent with the regulatory requirements for permit processing and issuance. Part 70 sets deadlines for permitting authorities to issue each type of title V permit. The EPA, as an oversight agency, is charged with ensuring that these deadlines are met as well as ensuring that permits are issued consistent with title V requirements. Part 70 describes the required title V program procedures for permit issuance, revision, and renewal of title V permits. Specifically, 40 CFR 70.7 requires that a permitting authority take final action on each permit application within 18 months after receipt of a complete permit application, except that action must be taken on an application for a minor modification within 90 days after receipt of a complete permit application.⁴⁶

5.1 Finding: The SDAPCD does not consistently process title V actions in a timely manner, resulting in a permitting backlog.

Discussion: The District does not consistently process permitting applications in a timely manner, mainly due to resource constraints and competing priorities. At the time of our evaluation, the SDAPCD had 28 title V sources and two synthetic minor sources.⁴⁷ Of these 28 sources, the District indicated 75% of sources have a pending renewal application. During the interviews, many expressed time constraints on permit issuance for both local permits and title V permits. Based on the documentation the District provided, there were several permit applications that have not been processed before the 18-month deadline as required by 40 CFR 70.7. In the last 5 years, about 40% of the title V applications received by the SDAPCD have had processing times in excess of 18 months. In addition to exceeding statutory permitting deadlines, delays create issues for the Compliance Division. See Finding 6.1. During interviews, District staff were confident that once the resources issue is addressed, the permitting backlog will no longer be an issue.

Recommendation: The EPA acknowledges that the SDAPCD is currently in transition and more engineers are now being trained and assigned to process title V permit actions. The District should develop a plan of action for reducing its title V renewal application backlog, as well as to process the new title V applications that the District will expect to receive as a result of their new Ozone Non-attainment area classification (See Section 7 of this report for additional discussion on the District's resources).

5.2 Finding: The SDAPCD routinely submits proposed and final permit actions to the EPA.

Discussion: 40 CFR 70.8(a)(1) and the SDAPCD's EPA-approved title V program require that proposed and final permits be sent to the EPA.

⁴⁶ See 40 CFR 70.7(a)(2) and 70.7(e)(2)(iv).

⁴⁷ See Finding 2.4 of this report for more discussion on the SDPACD's major source determination and Finding 5.4 for more discussion on the SDAPCD's synthetic minor sources.

During our review of recent actions, the EPA found that the SDAPCD routinely submits copies of both proposed and final title V permit actions to the EPA via the EPA Central Data Exchange's Electronic Permit System (EPS). The EPA oversight team receives the SDAPCD's permitting notices. These notices generally include the notice of proposed action, the proposed permit, and the proposed technical support document. However, during our internal file review, we found several instances where a copy of the statement of basis or technical support document for minor permit modifications was not included in the submitted permit package (see Finding 2.4).

Additionally, we could not find a requirement in the SDAPCD's title V rules (District Regulation XIV) that ensures a statement of basis is developed and provided during the public comment period and the EPA's 45-day review period. In 2020, the EPA revised the Part 70 program at 40 CFR 70.7 and 70.8 to make clear that the statement of basis must be made available to the public and the EPA.⁴⁸

Recommendation: The EPA commends the District for submitting its proposed and final permit actions to the EPA for review. The District should also ensure its proposed permits include a statement of basis, consistent with 40 CFR 70.7 and 70.8, and should update its title V rules for consistency with these requirements.

5.3 Finding: The SDAPCD has authority to use parallel processing to streamline the issuance of modified NSR and title V permits. However, it is not clear that this processing method is correctly utilized.

Discussion: EPA guidance and regulations allow sources to simultaneously apply for, and permitting authorities to process, revisions to NSR and title V permits.⁴⁹ Under this option, often referred to as "enhanced NSR," NSR permit modifications are subject to the procedural requirements of the Part 70 program, including a 45-day EPA review period and a 60-day petition period that allows citizens to petition the Administrator to object to permit issuance. After the NSR permit has been issued, and the project has been completed, the permitting authority revises the title V permit to add (or delete) the new or revised NSR conditions via an administrative amendment. The benefits of consolidating the NSR and title V permitting processes include reduced permit processing time and the opportunity for the EPA to review NSR permit actions.

The District appears to understand the enhanced NSR process, dedicating a section of their Engineering Division Manual of Operating Procedures to Enhanced Authority to Construct (Appendix H). The EPA supports this practice; however, our file review did not find evidence that SDAPCD was implementing enhanced NSR. Specifically, we did not find any examples of an

⁴⁸ See <https://www.federalregister.gov/documents/2020/02/05/2020-01099/revisions-to-the-petition-provisions-of-the-title-v-permitting-program>.

⁴⁹ See 40 CFR 70.7(d)(1)(v) and Appendix C: White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995; 11/7/95 letter from Lydia Wegman, OAQPS, to William Becker, STAPPA/ALAPCO; Title V Implementation Q & A, Region 9, December 1995.

administrative amendment that incorporated NSR permit conditions into a title V permit. Instead, the documentation shows that the District routinely incorporates new or revised NSR permit requirements into title V permits when a title V permit renewal is issued rather than making administrative revisions at the time of the permit action. Thus, it appears that the District may incorrectly be allowing 502(b)(10) changes to be used instead of documenting enhanced NSR practices. However, as noted in finding 2.4, since there is a lack of documentation regarding 502(b)(10) decisions, the EPA is unable to determine if that is the case, or if the District is just not completing their enhanced NSR process at the time of the permit action.

Recommendation: To address this finding, the District must ensure that the applicable permitting procedures required by the Part 70 program are followed. We recommend the District review the Part 70 program requirements related to enhanced NSR and 502(b)(10) changes and develop a plan to address this finding.

- 5.4 Finding:** The District does not evaluate the potential emissions from sources without title V permits to determine if they are major sources or whether such sources need synthetic limits to avoid title V applicability or other CAA requirements.

Discussion: A source may accept a voluntary limit (also known as a “synthetic minor” limit) to maintain its Potential to Emit (PTE) below an applicable major source threshold and thereby avoid major NSR permit requirements and/or the need for a title V permit. Sources establish such a limit by obtaining a synthetic minor permit containing practically enforceable emissions limitations from the permitting authority.

According to EPA guidance, synthetic minor limits must be enforceable as a practical matter, meaning they are both legally and practicably enforceable. Additionally, for emissions limits in a permit to be practicably enforceable, the permit provisions must specify: 1) technically-accurate limitations and the portions of the source subject to such limitations; 2) the time period for the limitations (emissions limit averaging period); and 3) the method to determine compliance, including appropriate and practically enforceable monitoring, recordkeeping, and reporting requirements.⁵⁰

In response to a petition regarding the Hu Honua Bioenergy Facility in Hawaii, the EPA stated that synthetic minor permits must specify: 1) that all actual emissions at the source are considered in determining compliance with its synthetic minor limits, including emissions during startup, shutdown, malfunction or upset; 2) that emissions during startup and shutdown (as well as emissions during other non-startup/shutdown operating conditions) must be included in the semi-annual reports or in determining compliance with the emissions limits; and

⁵⁰ *Options for Limiting the Potential to Emit (PTE) of a Stationary Source Under Section 112 and Title V of the Clean Air Act (Act)*, John S. Seitz, Director, Office of Air Quality Planning and Standards (January 25, 1995).

3) how the source's emissions shall be determined or measured for assessing compliance with the emissions limits.⁵¹

The District does not have a policy for setting synthetic minor limits but has two local rules, Rules 60.1 and 60.2, that can be used to limit a source's PTE. These rules are available to sources seeking to avoid major source status through voluntary requirements. However, the use of these rules appears limited, and the District does not independently determine the facility-wide PTE of the sources it regulates. Instead, the District determines major source status based on actual emissions. While using actual emissions was acceptable for avoiding title V permitting as part of the EPA's 1995 transition policy, that policy expired in 2000.⁵²

Determining whether a stationary source is a major source and subject to the title V program is based on potential, not actual, emissions.⁵³ We found during the evaluation that District permitting staff are generally familiar with calculating the PTE of impacted emissions units when issuing local permits. And the District closely tracks the actual annual emissions of each facility. However, the District does not calculate or track a facility's PTE on a facility-wide basis. Because major source status is based on facility-wide potential emissions, it is challenging for the District to know when an existing minor source becomes a major source or whether a source's claim of being a minor source is accurate. This is particularly problematic for the current situation where the District was recently reclassified as Severe nonattainment for the ozone NAAQS causing the major source threshold in San Diego County for NO_x and VOC to drop to 25 tons per year. Beyond title V applicability, this issue can also have implications in determining NSR program requirements and requirements for major sources of HAPs. This also creates potential enforcement risk for any facility relying on actual emissions to not obtain a title V permit or a major NSR permit.

Recommendation: The SDAPCD must develop a plan for ensuring the District can determine title V applicability according to the definition for "major source" under 40 CFR 70.2 by evaluating the facility-wide PTE. For those facilities with a PTE above the major source threshold that wish to avoid title V permitting, we recommend the District develop internal guidance for permitting synthetic minor sources consistent with EPA policy, and that permitting staff take the EPA's online training for Setting Enforceable Potential to Emit Limits in NSR Permits.⁵⁴

⁵¹ *Order Responding to Petitioner's Request that the Administrator Object to Issuance of State Operating Permit Petition No. IX-2011-1*, Gina McCarthy, Administrator (February 7, 2014).

⁵² See the EPA's December 20, 1999 guidance memorandum "Third Extension of January 25, 1995 Potential to Emit Transition Policy." <https://www.epa.gov/sites/default/files/2015-08/documents/4thext.pdf>

⁵³ See definition of "Potential to emit" at 40 CFR 70.2.

⁵⁴ <https://airknowledge.gov/SI/PERM203-SI.html>

6. Compliance

This section addresses the SDAPCD practices and procedures for issuing title V permits that ensure compliance with all applicable requirements. Title V permits must contain sufficient requirements to allow the permitting authority, the EPA, and the general public to adequately determine whether the permittee is in compliance with all applicable requirements.

Compliance is a central priority for the title V permit program. Compliance assures a level playing field and prevents a permittee from gaining an unfair economic advantage over its competitors who comply with the law. Adequate conditions in a title V permit that assure compliance with all applicable requirements also result in greater confidence in the permitting authority's title V program within both the general public and the regulated community.

6.1 Finding: The District performs Full Compliance Evaluations (FCEs) of all title V sources on a schedule consistent with its negotiated compliance monitoring strategy (CMS).

Discussion: The EPA's 2016 Clean Air Act Stationary Source Compliance Monitoring Strategy⁵⁵ recommends that permitting authorities perform FCEs for most title V sources at least every other year. For the vast majority of title V sources, the EPA expects that the permitting authority will perform an on-site inspection to determine the source's compliance status as part of the FCE. In addition to weekly routine inspections, the SDAPCD has established its inspection priority, giving emphasis to sources receiving ongoing public complaints, sources with issues of continued non-compliance, and sources that need follow-up due to a Notice of Violation (NOV).⁵⁶ During interviews, District inspectors indicated that quarterly compliance evaluations and annual full inspections are conducted for all permitted equipment. However, District inspectors also indicated that the effectiveness of the inspection schedule may be compromised due to delays in processing open permit applications.

Recommendation: The EPA commends the District's ongoing efforts to perform FCEs of all title V sources annually.

6.2 Finding: The District's Compliance Division reviews all title V deviation reports, annual compliance certifications, and semiannual monitoring reports submitted by Part 70 sources.

Discussion: During interviews, the District's compliance staff indicated that all deviation reports, quarterly monitoring reports, and compliance certifications that sources submit to the agency are reviewed by inspectors. Supervisors and the Chief of Compliance Division review reports as necessary. The SDAPCD tracks these reports through their internal database and reviews these records through their compliance staff and supervisors. If NOVs are warranted after reviewing a report, the inspectors are required to discuss the documented deficiency with

⁵⁵ This document is available at: <https://www.epa.gov/compliance/clean-air-act-stationary-source-compliance-monitoring-strategy>.

⁵⁶ See *Inspection Practices and Priorities*, SDAPCD Compliance Division Policy and Procedures Manual, Policy number 2.1, effective date September 1, 1998, revised on July 25, 2016.

the facility prior to issuing the NOV, to explain the nature of the violation, and advise the site to respond to NOVs timely with the actions needed to return to compliance or prevent future violations prior. Compliance supervisors will review the violation and associated report and are responsible for approving NOVs.

In addition, engineering staff indicated that deviation reports and compliance certifications are typically not routinely reviewed during permit processing. For example, reviewing these documents as part of the title V permit renewal process could indicate a need to increase testing frequency or require different monitoring that would ensure compliance.

Recommendation: The EPA commends the SDAPCD's efforts in reviewing and tracking all deviation reports, quarterly monitoring reports, and compliance certifications. We encourage the SDAPCD to coordinate the outcomes of compliance issues with permitting staff. See Finding 6.6.

- 6.3 Finding:** When potential compliance issues are discovered, the District addresses them prior to permit issuance. However, the District's statement of basis could be improved to include compliance history.

Discussion: The Part 70 program requires that each title V permit contain a schedule of compliance if necessary.⁵⁷ This includes ensuring title V permits contain requirements that ensure sources comply with requirements that have future compliance dates and ensure that title V permits contain enforceable milestones leading to compliance for those requirements for which the source is not in compliance. Based on interview responses, the District has not recently issued permits with compliance schedules. Instead, compliance staff will generate a citation report, which is sent to the District's Civil Actions Investigator to determine the corresponding penalty. Pending permit applications are not processed until a facility comes back into compliance. This practice does not appear to significantly affect or delay the issuance of permits.

Recommendation: We recommend the compliance section in the District's statement of basis be improved to include the source's compliance history and the actions being taken to address compliance issues, as applicable.

- 6.4 Finding:** The District uses title V compliance certifications and semiannual monitoring reports to prioritize inspections and initiate enforcement actions.

Discussion: Similar to our 2008 Evaluation, the District continues to prioritize inspections and initiate enforcement actions by using title V compliance certifications and semiannual monitoring reports.⁵⁸ The District's Compliance Division has a policy for reviewing annual compliance certifications and semiannual monitoring reports (which include deviation

⁵⁷ See 40 CFR 70.6(c)(3) and 70.5(c)(8).

⁵⁸ See 2008 Evaluation, Finding 6.1.

reports).⁵⁹ The District uses these title V compliance reports as well as past violations, recent applications and activities to prioritize and target inspections. Interviewees stated that they review these reports for compliance issues. They also review the facility's compliance history, including recent inspections, breakdowns, exceedances, or violations, if any. The District uses this information to prioritize inspections.

The District has also initiated enforcement actions at title V facilities based on information from compliance certifications and semiannual monitoring reports. In one example, the District issued an NOV for a violation identified in a title V report. The violations were related to time periods when the facility failed to maintain NO_x and O₂ CEMS per Appendix B of 40 CFR Part 75. Since the violations were short-term (i.e., not ongoing) and the facility was not out of compliance at the time of permit issuance, a schedule of compliance was not required.⁶⁰

Interviewees were generally knowledgeable about the procedures for reviewing title V compliance reports and were aware of the District's policy for title V report reviewing process, for issuing a NOV and/or a Notice to Comply (NTC).

Recommendation: The EPA encourages the District to maintain its practice of using title V compliance reports to prioritize and target inspections and to continue implementing its policy for reviewing these reports.

6.5 Finding: Compliance staff have the necessary equipment to perform their job duties but find the procurement process for new equipment to be slow.

Discussion: During interviews, members of the Compliance Division stated that they have sufficient tools and safety equipment to perform inspections, including hard hats, safety glasses, safety vests, and an annual voucher for safety shoes. At the same time, employees also expressed the need for new monitoring equipment as existing equipment, including Thermo Fisher Scientific analyzers, are experiencing a loss in functionality due to age. Though the process for equipment repairs and purchases have been initiated, they have been slow. Compliance staff also mentioned that they could have been supplied with better personal protective equipment during the COVID-19 pandemic.

Recommendation: The EPA recommends that the District review its equipment needs and plan in advance for the replacement of old and outdated equipment to expedite the procurement process.

6.6 Finding: While the SDAPCD has a process in their internal database for compliance staff to request changes to title V permits, it is unclear if it is being used consistently.

⁵⁹ See *Review of Title V Semiannual and Annual Reports*, SDAPCD Compliance Division Policy and Procedures Manual, Policy number 3.13, effective date April 4, 2002, revised in August 2018.

⁶⁰ A schedule of compliance is required for Title V sources that are not in compliance with all applicable requirements at the time of permit issuance. (See 40 CFR 70.5(c)(8)(iii)(C).)

Discussion: In our 2008 Evaluation, we found that the SDAPCD did not have a clear track record of utilizing the District's internal Request for Change of Permit Conditions form to make corrections to title V permits, and that the decisions made by the Engineering Division on such requests were seldom communicated back to the Compliance Division. The District has since developed a policy for the use of such request forms. Under the Division policy, compliance staff are expected to review all permit conditions during the annual inspection and submit a Request for Change of Permit Conditions form to the Division Chief if a site-specific permit condition is found to not be clear, enforceable, or consistent with existing rules and/or other applicable requirements. The Division Chief is responsible for keeping the inspector and their supervisor informed of any decision.⁶¹ For issues identified across multiple permits, the policy states these issues should be forwarded to the District's Permit Streamlining Committee for evaluation. However, the District noted that the Permit Streamlining Committee has not existed for a very long time. The District should consider updating its SOP or restarting the Committee.

During interviews, inspectors said they have used the request change forms in the District's database system to request changes to the title V permits. Interviewees expressed concern about the length of time it takes for changes identified to be made and about the Engineering Division's lack of action on some requests. Compliance staff noted that some permits were not updated in a timely manner to make the permit conditions enforceable. In some cases, this resulted in NOVs being issued that compliance staff believe would have been unnecessary if the permit had included monitoring and recordkeeping that facilitated compliance with the requirements in the permit.

While the Permit Change Request process appears to be a good mechanism for inspectors to request correction of obvious errors, or minor administrative changes, compliance staff may have stopped using the process based on historical lack of response from the Engineering Division.

Recommendation: Engineering and Compliance Divisions should agree on a realistic Permit Change Request process, including the types of changes that should be made and the appropriate timeframe for doing so, so that both Divisions can work together to ensure enforceable permits. The District should consider updating its SOP or restarting the Permit Streamlining Committee.

⁶¹ See *How to Submit Permit Change Requests*, SDAPCD Compliance Division Policy and Procedures Manual, Policy number 2.18, effective date February 17, 2016, revised in July 2017.

7. Resources and Internal Management

The purpose of this section is to evaluate how the permitting authority is administering its title V program. With respect to title V administration, the EPA's program evaluation: (1) focused on the permitting authority's progress toward issuing all initial title V permits and the permitting authority's goals for issuing timely title V permit modifications and renewals; (2) identified organizational issues and problems; (3) examined the permitting authority's fee structure, how fees are tracked, and how fee revenue is used; and (4) looked at the permitting authority's capability of having sufficient staff and resources to implement its title V program.

An important part of each permitting authority's title V program is to ensure that the permit program has the resources necessary to develop and administer the program effectively. A key requirement of the Part 70 program is that the permitting authority establish an adequate fee program to ensure that (1) title V fees are adequate to cover title V permit program costs, and (2) are used solely to cover the permit program costs. Regulations concerning the fee program and the appropriate criteria for determining the adequacy of such programs are set forth in 40 CFR 70.9.

7.1 Finding: The SDAPCD staff report that they receive effective legal support from the District Counsel's office.

Discussion: In our 2008 Evaluation,⁶² we stated that the SDAPCD staff receive expert, knowledgeable, and experienced legal support. Since then, the District Counsel in place during our 2008 Evaluation retired and another District Counsel was hired with equally effective results. However, as a result of the recent change in leadership, the District, at the time of our site visit, was in the process of hiring a new District Counsel. At the time of our final report, the SDAPCD hired a new District Counsel with extensive experience in air quality programs. The District's legal support is currently in transition but given the record of effective legal support for the title V program and District management's understanding of the importance of this function, the EPA expects that District staff will continue to receive effective legal support for the District's title V program.

Recommendation: The EPA commends the SDAPCD on hiring a new District Counsel with extensive experience in air quality programs. The SDAPCD should continue to ensure that it receives effective legal support for the Part 70 program.

7.2 Finding: The District tracks title V program expenses and revenue and those funds are spent solely to support the title V program.

Discussion: The Part 70 regulations require that permit programs ensure that the collected title V fees are adequate to cover title V permit program costs and are used solely to cover the permit program's costs.⁶³ In our 2008 Evaluation, the EPA did not closely review title V fee

⁶² 2008 Evaluation, Finding 7.2.

⁶³ See 40 CFR 70.9(a).

accounting as the District's program at the time was not experiencing any staff shortages, nor delays in its permit processing times. In this more recent effort, the SDAPCD provided accounting data for the prior 3 years. As noted elsewhere in this report, prior to the title V program, the SDAPCD was already implementing its own permitting program. When the Part 70 requirements took effect, the SDAPCD treated the Part 70 requirements as an overlay to the existing SDAPCD permitting program. As a result of this approach, the SDAPCD treated the revenue and expenses associated with the Part 70 program as supplemental to the revenue and expenses associated with the existing local permitting program. Thus, the combination of their base permitting program and the additional Part 70 requirements that apply to title V sources result in the full program as implemented by the SDAPCD. Using an approach based on full cost recovery, the SDAPCD ensures that it collects fees for its base permitting program and the supplemental title V costs (including overhead, compliance costs, etc.) that match the expenses used for implementing the supplemental title V program requirements. See Appendix F for details regarding their accounting approach.

As discussed in Findings 5.1 and 7.6, the District has a title V permitting backlog and is experiencing difficulty retaining permitting and compliance staff. Further, Finding 2.4 discusses that the District's lack of documentation for processing changes as 502(b)(10) changes. While the District's accounting approach is consistent with the Part 70 program requirements, it is not clear whether those fees will be sufficient going forward to fully administer the program.

Recommendation: The EPA commends the SDAPCD for their approach to accounting for both revenue and expenses for the implementation of the title V program. During the evaluation, the EPA provided the SDAPCD with the most recent EPA policy on title V funding (see appendix E). We recommend the SDAPCD review the policy to assure their fee program continues to be consistent with EPA title V fee policy and that fees will be sufficient going forward.

7.3 Finding: The District permitting and compliance management communicate well and meet routinely to discuss programmatic issues. However, the results of these discussions are not clearly and consistently communicated to compliance staff and has resulted in uncertainty regarding outcomes of issue resolution among compliance staff.

Discussion: In our 2008 Evaluation, we found that permitting decisions were not always clearly communicated among the SDAPCD's engineering and compliance staff.⁶⁴ During this evaluation, we found the lack of communication and coordination at the staff level persists. The SDAPCD's compliance and engineering management continue to hold routine meetings to discuss permitting and compliance issues; however, such meetings are not held regularly at the staff level. Although the District's permitting staff indicated that draft permits for unique sources are sent to Compliance for review, the District's compliance staff indicated that draft permits are rarely sent to the Compliance Division for review prior to the public comment period.⁶⁵

⁶⁴ See 2008 Evaluation, Finding 7.1.

⁶⁵ See Finding 6.6 of this report for more discussion on compliance permit feedback process.

Permitting staff, as a practical matter, should be accessible to the compliance staff for consultation on practical enforceability, applicability determinations, and compliance determinations. Having a systematic process, especially in cases that involve more than one group within the District, would reduce the time necessary to resolve complex issues and minimize potential delays in permit issuance or in appropriate enforcement action.

Recommendation: The EPA commends the SDAPCD's effort to maintain good communication between permitting and compliance management. However, we encourage the SDAPCD to promote increased communication and cooperation between permitting and compliance staff, and to explore ways to improve permitting decisions among SDAPCD's engineering and compliance staff.

7.4 Finding: The District lacks a training plan for its permitting and compliance staff.

Discussion: In the past, the District assigned one permit engineer to prepare all of its title V permits. During this evaluation, the EPA noted that the District's current approach is to distribute the title V workload among multiple permit engineers. The District's current approach addresses the issue of a significant loss of institutional knowledge when a single permitting engineer leaves. The District's title V permitting program is experiencing staffing challenges associated with the varying levels of experience among the permitting staff as they move to a more distributed workload approach to processing permits. In addition, we identified several substantive issues related to permit preparation and content indicating a need for further title V training in order to prepare more effective permits (See Section 2). In interviews, staff identified title V training, primarily focusing on permit writing and inspections, as something that would improve the District's title V program. District staff specifically suggested training on federal regulations (NESHAPs and NSPS), would improve staff's familiarity with regulatory requirements and help permit writers identify how best to incorporate these requirements into title V permits. The EPA has separately identified training needs related to CAM and other critical program elements and policies.

For Compliance, it appears that the amount and content of trainings for inspectors varies from supervisor to supervisor, and that the Compliance Division has no formal training plan, training material, or standardized procedure. Training is heavily focused on shadowing experienced inspectors in the field. Staff and managers acknowledged that they would likely benefit from standardized training.

Recommendation: The EPA commends the SDAPCD for distributing title V work to more than one permit engineer. The District should identify core training needs and develop a curriculum that title V program staff, both permitting and compliance, should complete to enhance title V program understanding and improve permit writing and compliance determinations.⁶⁶

⁶⁶ In other title V program evaluations, the EPA has found good examples of the type of training and curriculum that the District may find most useful. For example, see Finding 7.4 on pages 33 and 34 of the EPA's "Bay Area Air Quality Management District title V Operating Permit Program Evaluation Final Report September 29, 2009", which is available on the EPA's website at <https://www.epa.gov/sites/default/files/2015-07/documents/bayarea-final-report9-29-09.pdf>.

Regulatory updates sent by EPA Region 9 can also be shared with staff as it contains relevant updates to NSPS and NESHAP requirements and can be used as reference material for finding relevant information on the EPA’s website.⁶⁷ Additionally, the District should encourage staff to network with staff from other agencies by allowing them to participate in other learning opportunities such as conferences, workshops and online trainings/webinars.

- 7.5 Finding:** Permitting staff demonstrated a general lack of knowledge on environmental justice (EJ) related to permitting and would like the EPA to provide training on this issue.

Discussion: As noted in the 2008 Evaluation, the District’s permitting staff is generally not familiar with EJ issues and how these issues may arise in a permitting context.⁶⁸ As a result, there is uncertainty about tools that may help them address EJ issues and inform the public more effectively of permitting actions. In the EPA’s prior evaluation, the EPA committed to providing EJ training but was unable to do so given resource constraints at the time. However, in January 2022, the EPA held a two-day training for Region 9 permit writers on EPA’s EJScreen tool and provided case studies from across Region 9 for implementing EJ in permitting.

One of the tools available to help anticipate where EJ issues may arise with permitting actions is the EPA’s EJScreen tool. This tool can be used to prepare maps that highlight specific demographic data for use in focusing outreach, for example. The EPA suggests that the District examine the maps provided in the appendices to this report (including the linguistic isolation map – see Appendix D) to familiarize staff with the EJScreen tool and its capabilities in identifying communities where additional outreach on permitting actions may be warranted.⁶⁹

Recommendation: We recommend the District permitting and compliance staff coordinate with the District’s new OEJ to assist with EJ considerations in permitting. The EPA will continue to share new information related to EJ in permitting as it becomes available.

- 7.6 Finding:** The SDAPCD faces staffing challenges, one of the symptoms of which is a permitting backlog, that, with its recent reclassification to a higher nonattainment status, will create additional resource demands on its title V permitting process.

Discussion: The results of our interviews suggest that the District should focus on succession planning to better prepare for the event that staff leave the District. The recent reclassification of the County to a higher nonattainment classification will result in additional facilities being subject to title V permitting requirements. The EPA notes that after our field work was completed, the District shared with us a compensation analysis that was recently conducted for

⁶⁷ For example, recent updates provide a link to the federal government’s new “eCFR” website that can be used to compare versions of federal regulations to see what has recently changed. This feature can be helpful when working on a title V renewal action.

⁶⁸ See, e.g., <https://www.epa.gov/sites/production/files/2015-07/documents/ej-permitting-faqs-4.29.pdf>.

⁶⁹ For an overview of the EJScreen tool, please see <https://www.epa.gov/ejscreen>. For learning resources on EJScreen, please see <https://www.epa.gov/ejscreen/learn-use-ejscreen>. CalEnviroScreen, a similar tool available in California, would provide similar information.

the Service Employees International Union (SEIU) (Titled Base Salary Compensation Study, by Koff & Associates, dated September 29, 2021, independently from SEIU and the County of San Diego, see Appendix K). As a result of this analysis, the County approved a compensation change for the covered job classifications discussed above in June 2022. In addition, the SDAPCD, like other agencies, experienced high turnover as a result of the COVID-19 pandemic, increasing the number of existing vacancies.

Impacts of high staff turnover rate include: (1) a workload situation in which certain key title V program tasks are or may not be completed in the timeframe required by District rules and the Part 70 program (see Finding 5.1 regarding the SDAPCD's permitting backlog), and (2) a lack of institutional knowledge at the staff level within the District's permitting and compliance programs, and (3) a lack of adequate resources necessary to complete both existing and new workloads. These impacts will likely be amplified by the County's transition to a higher nonattainment classification.

Recommendation: Staff turnover can erode an agency's institutional knowledge, which can create delays in the issuance of title V permits and lead to inconsistent permitting determinations.⁷⁰ Based on discussions with the District and the recent compensation analysis and compensation changes, a next step to address staffing challenges should include a review of the present permitting program workload and an analysis of the upcoming workload change associated with the change in the nonattainment classification in order to ensure that the permitting program can operate effectively and efficiently with adequate staffing.

⁷⁰ In the EPA's 2008 Evaluation, we noted that the District had considerable experience in its title V program (see findings 2.2 and 7.3 of our 2008 Evaluation).

8. Records Management

This section examines the system the SDAPCD has in place for storing, maintaining, and managing title V permit files. The CAA provides that certain documents created pursuant to the title V permitting program, including the permit application, be made available to the public but also allows some protections for confidential information.⁷¹ The SDAPCD has a responsibility to the public in ensuring that title V public records are complete and accessible.

In addition, the SDAPCD must keep title V records for the purposes of having the information available upon the EPA's request. 40 CFR 70.4(j)(1) states that any information obtained or used in the administration of a State program shall be available to the EPA upon request without restriction and in a form specified by the Administrator.

The minimum Part 70 record retention period for permit applications, proposed permits, and final permits is five years in accordance with 40 CFR 70.8(a)(1) and (a)(3). However, in practical application, permitting authorities have often found that discarding title V files after five years is problematic in the long term.

8.1 Finding: The SDAPCD has successfully converted all permitting hard copy files to electronic files and stores historical physical title V permit files in a central records center.

Discussion: According to the SDAPCD, they have digitized all their files and any physical files are archived in a separate records center. During our site visit, most interviewees stated that they do not normally use any hard copies, and if they do, it is due to personal preference. This conversion helped greatly during the COVID-19 pandemic.

Recommendation: The EPA commends the SDAPCD on its conversion to all electronic files.

8.2 Finding: The SDAPCD has improved its written file retention policy. However, most staff interviewed are not aware of the District's record retention schedules.

Discussion: Similar to our 2008 Evaluation, the SDAPCD has a written file retention policy for retaining, managing, and disposing of official records; however, most staff are not aware of the District's record retention schedules.⁷² Previously, for permit-related records, the District's records retention schedule required that permit files, including title V permit files, be retained for a total of nine years—two years after completion of a project at the District's office (onsite)

⁷¹ This protection, however, is not absolute as the types of information that may be treated as confidential, and therefore withheld from the public, is limited. Specifically, "[t]he contents of a permit shall not be entitled to [confidential] protection under section 7414(c) of this title." CAA section 503(e), referring to section 114(c) of the CAA which provides protection of certain confidential trade secret information – but not emissions data – from disclosure. In addition to the title V program requirements, confidentiality is also addressed in the EPA's regulations governing the disclosure of records under the Freedom of Information Act (FOIA). Pursuant to those requirements, information which is considered emissions data, standards or limitations are also not entitled to confidential treatment. See *In the Matter of ExxonMobil Corporation, Baytown Refinery*, Order on Petition No. VI-2016-14 (April 2, 2018) (Baytown Order).

⁷² 2008 Evaluation, Finding 9.2.

and seven years off-site. The schedule did not specifically address the retention time for title V-related compliance records, which include compliance certifications, deviation reports and semiannual monitoring reports. While the District's record retention schedule contained a general section on compliance and enforcement documents, the schedule only required that the District retain these documents for up to three years. With the current file retention policy,⁷³ title V documents are maintained while a permit is still active and then an additional five years after the permit is terminated. The title V compliance files are also now explicitly listed with a retention time frame of five years.

Recommendation: The EPA commends the SDAPCD on having a written file retention policy that complies with the federal regulation. We recommend that the District provide training to staff on its records management policies.

8.3 Finding: The SDAPCD uses an electronic database to track title V permits and continues to make database improvements.

Since our 2008 Evaluation, the SDAPCD has replaced its previous permitting database, VAX, to a web-based Business Case Management System (BCMS). Generally, most District staff believe it is an improvement from VAX and that it is good at both storing electronic communications and tracking information. For example, final permitting documents, public comments, and email exchanges relating to the permit are captured in the database. The BCMS can track compliance reports and violations, generate site history and productivity reports for inspectors, and create a priority list of inspections each quarter. The system also currently stores annual/semi-annual reports, generates site history report, and generates priority list of inspection on quarterly basis. The system can also generate a report of pending applications and track application deadlines.

The BCMS was not originally designed for the title V program. For instance, BCMS can generate a report of all title V applications but cannot distinguish between different types of title V applications. Further, the BCMS does not currently track synthetic minor⁷⁴ and title V sources explicitly. When the EPA requested data on the processing times for the District's title V permits, the SDAPCD had to wait three weeks to get that query created due to other workload priorities. However, after the query was created, the turnaround time for similar processing time requests was significantly shortened. The District continues to work with developers to upgrade the permit and compliance report generation capabilities.

As mentioned in Finding 2.3, the BCMS stores permit conditions used in permits to help with consistency from permit to permit. However, if modifications are made to a condition stored in the database, a new template condition is generated in the database and sometimes it is difficult to track which template condition to use. When the template permit condition is

⁷³ Appendix G – Record Retention Schedule.

⁷⁴ See Finding 5.4 of this report. Actual emissions of individual equipment are recorded as the PTE, and facility-wide PTE is not tracked.

updated, it also does not universally update all the permit conditions where the template was used, the District has to manually update each permit that contains that template condition.

Generally, District staff suggested that even though the BCMS is workable, it is generally slow, not very effective, and information can be difficult to retrieve sometimes. The BCMS has limited workflow tracking capabilities and ability to track fees and calculations. There's currently no streamlined process that moves a permit application through different stages of review within the system.

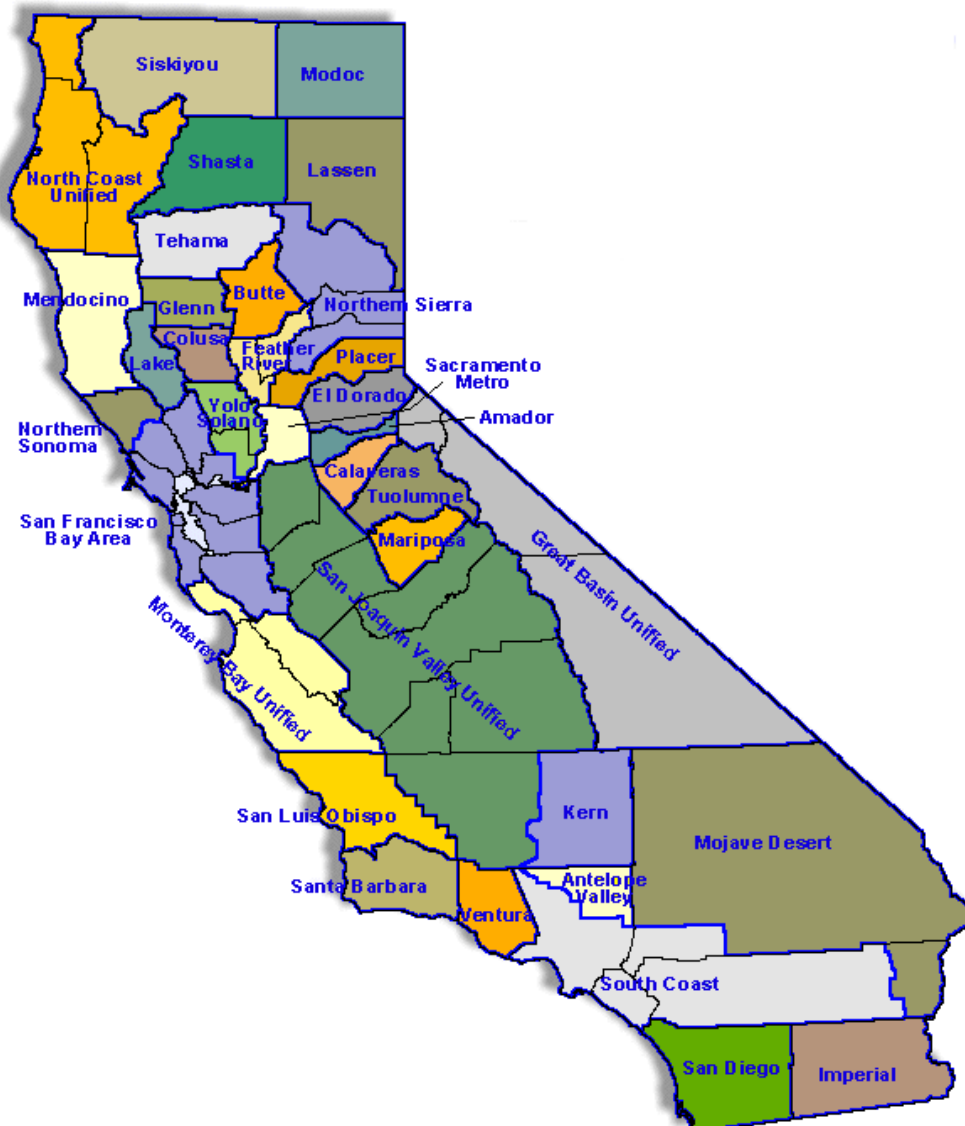
Recommendation: The EPA encourages the SDAPCD to continue to improve BCMS or explore other database options to help manage and track its permitting and compliance tasks.

Appendix A. Air Pollution Control Agencies in California

CALIFORNIA MAP FOR LOCAL AIR DISTRICT WEBSITES

The State is divided into Air Pollution Control Districts (APCD) and Air Quality Management Districts (AQMD), which are also called air districts. These agencies are county or regional governing authorities that have primary responsibility for controlling air pollution from stationary sources. The following map is for informational purposes and shows the Air District Boundaries. This map can be used to access local air district websites or an email address for that district if there is no website.

California Air Districts



[Local Air District Resource Directory](#)
[California Air Pollution Control Officers Association \(CAPCOA\)](#)
[Other Maps on this Website](#)

The Board is one of six boards, departments, and offices under the umbrella of the California Environmental Protection Agency.
 Cal/EPA | ARB | CIWMB | DPR | DTSC | OEHHA | SWRCB

Appendix B. Title V Questionnaire and the SDAPCD Responses



United States Environmental Protection Agency

Region 9 – Pacific Southwest

<https://www.epa.gov/caa-permitting/caa-permitting-epas-pacific-southwest-region-9>

Title V Program Evaluation

Questionnaire

Contents

A. Title V Permit Preparation and Content	3
B. General Permits (GP)	7
C. Monitoring.....	8
D. Public Participation and Affected State Review	9
Public Notification Process	9
Public Comments	10
EPA 45-day Review	11
Permittee Comments	12
Public Hearings	12
Availability of Public Information	12
Affected State Review and Review by Indian Tribes	14
E. Permit Issuance / Revision / Renewal	16
Permit Revisions.....	16
Permit Renewal Or Reopening.....	17
F. Compliance.....	19
G. Resources & Internal Management Support	22
Environmental Justice Resources.....	24
H. Title V Benefits	26

A. Title V Permit Preparation and Content

1. For those title V sources with an application on file, do you require the sources to update their applications in a timely fashion if a significant amount of time has passed between application submittal and the time you draft the permit? Y ☐ N ☒

Explanation: The District maintains a permitting database (BCMS) that already contains any updated information, so there isn't a need to also require the facility to update their application forms. The District includes any such changes in the statement of basis and proposed permit with an appropriate explanation of any changes.

- a. Do you require a new compliance certification? Y ☐ N ☒

Explanation: The District has not encountered any recent situations where there were sufficient changes that warranted an additional compliance certification. However, the District does not rule out requiring one if a specific case warranted it.

2. Do you verify that the source is in compliance before a permit is issued? Y ☒ N ☐ If so, how?

Explanation: The District conducts periodic inspections of each facility as well as reviewing the operating conditions relative to the underlying rules. Newly constructed facilities are inspected by a permit engineer prior to issuance of the operating permit.

- a. In cases where a facility is either known to be out of compliance, or may be out of compliance (based on pending NOVs, a history of multiple NOVs, or other evidence suggesting a possible compliance issue), how do you evaluate and document whether the permit should contain a compliance schedule? Please explain and refer to appropriate examples of statements of basis written in 2005 or later in which the District has addressed the compliance schedule question.

Explanation: The District has not encountered the need for a compliance schedule for the Title V sources in San Diego County within recent history (current staff is not aware of any such situations in the last ten years. A more in-depth search of records has not been conducted due to the resources necessary to review archived records). The District does not require a compliance schedule for minor non-compliance that we expect to be corrected within reasonable timeframes, and would not withhold issuance of the permit in this case either. However, if a source was found to be significantly out of compliance, it is likely a compliance schedule would be required or the permit would not be issued.

3. What have you done over the years to improve your permit writing and processing time?

Promoted training opportunities, ensured that all permit engineers can work on Title V applications, and formalized procedures on how to issue Title V permits. The Engineering Division also closely work with the Compliance Division to gain an enforcement perspective when proposing new permit conditions.

4. Do you have a process for quality assuring your permits before issuance? Y ☒ N ☐ Please explain.

Explanation: Each portion of the permit is reviewed by an Engineering Supervisor to ensure that the requirements are accurate, enforceable, and that the permit contains all applicable requirements. All new permit conditions are also reviewed by a Compliance Supervisor to ensure they are enforceable. The body of the Title V permit is drafted by an engineer and reviewed by a senior engineer or the engineering chief. The entire permit is also reviewed by a compliance representative before sending for EPA review and public

comment. To ensure consistency and accuracy the District also utilizes templates and past examples of approved permit language to minimize the possibility for errors.

5. Do you utilize any streamlining strategies in preparing the permit? **Please explain.**

- a. What types of applicable requirements does the District streamline, and how common is streamlining in District permits?

The District utilizes streamlining extensively and combines eligible requirements from rules including local prohibitory rules, conditions imposed through NSR, NSPS and NESHAP requirements, and any other federal or local requirements that are eligible for streamlining. The majority of streamlining occurs during the initial (non-Title V) review of each operating permit, frequently based on templates or examples of past permits.

- b. Do you have any comments on the pros and cons of streamlining multiple overlapping applicable requirements? **Describe.**

The benefits of streamlining outweigh the disadvantages in the District's experience. It allows for simplified permits, and ensures all applicable requirements are incorporated. The only disadvantage in applying the most stringent requirement is that facilities can challenge the requirement when found in noncompliance with a streamlined permit term (when they would have complied with one or more of the underlying requirements if listed separately). However, this disadvantage is mitigated by ensuring the facility is consulted prior to limits being streamlined. There have not been any situations where streamlining permits resulted in difficulty enforcing applicable requirements.

6. What do you believe are the strengths and weaknesses of the format of District permits (i.e. length, readability, facilitates compliance certifications, etc.)? **Why?**

The District's permit format includes two separate portions of the permit: the forward section, containing all requirements specific to Title V including general requirements, and the first Appendix, consisting of the emission unit specific permits (which are initially drafted, reviewed and issued through the parallel local permitting program before being integrated into the Title V permit). Each local permit in the Appendix lists federally enforceable and local only enforceable conditions listed separately. The advantages of this approach is that it makes clear which requirements apply to the specific emission units, and allows use of standardized permit language and format for the forward section, streamlining issuance of the Title V permit. The disadvantages are that this approach leads to instances of duplicate requirements in the emission unit specific permits and forward section, and adds a small amount of additional work to process the two parallel application tracks (local and Title V).

7. How have the District's statements of basis evolved over the years since the beginning of the Title V program? Please explain what prompted changes, and comment on whether you believe the changes have resulted in stronger statements of basis.

The District has seen evolution of the statements of basis over time. In recent history, the statements of basis have been streamlined, minimizing the amount of review necessary to prepare it. However, based in part on past EPA comments regarding content of the statements of basis, and contributions from new staff, the District has recently undertaken an effort to enhance the statements of basis to include more information, more thoroughly document review process and decisions made, explain monitoring and CAM requirements, and more clearly focus on highlighting changes to the permits included in the permit action. The District has implemented these changes and it is in the later phases of fully implementing them. The District expects these changes to assist EPA and the public in reviewing Title V actions.

8. Does the statement of basis explain:

- a. The rationale for monitoring (whether based on the underlying standard or monitoring added in the permit)? **Y** ☒ **N** ☐
- b. Applicability and exemptions, if any? **Y** ☒ **N** ☐
- c. Streamlining (if applicable)? **Y** ☒ **N** ☐

Explanation: In most cases, this discussion occurs during review of the underlying local permit and would be contained in the engineering evaluation for those specific emission unit specific permits, and this detailed information would be available upon request.

9. Do you provide training and/or guidance to your permit writers on the content of the statement of basis? **Y** ☒ **N** ☐

- a. Do you have written policy or guidance on practical enforceability? **Y** ☒ **N** ☐

Explanation: While the District does not specifically identify any guidance for “practical enforceability”, the Engineering Department’s Manual of Procedures (MOP) contains some guidance that addresses enforceability and drafting of permit conditions. The District also utilizes templates for conditions that have been reviewed for enforceability, as well as ensuring that these requirements are reviewed both by Engineering and Compliance Supervisors prior to the permit issuance.

10. Do any of the following affect your ability to issue timely initial title V permits:
(If yes to any of the items below, please explain.)

- a. SIP backlog (i.e., EPA approval still pending for proposed SIP revisions) **Y** ☐ **N** ☒
- b. Pending revisions to underlying NSR permits **Y** ☐ **N** ☒
- c. Compliance/enforcement issues **Y** ☐ **N** ☒
- d. EPA rule promulgation pending (MACT, NSPS, etc.) **Y** ☐ **N** ☒
- e. Permit renewals and permit modification (i.e., competing priorities) **Y** ☒ **N** ☐
- f. Awaiting EPA guidance **Y** ☐ **N** ☒

Explanation: The District does currently have a backlog of permit applications and is actively taking steps to address this issue. In recent past, the District has experienced challenges with staffing resources to handle competing priorities – specifically the development and implementation of a new emission inventory program, implementation of the Hot Spots Program and the requirements under AB617 (Community Air Protection Program) and AB423 (Gloria 2019). Additionally, the Covid-19 pandemic and retirement of experienced staff have exacerbated the existing backlog.

Steps currently being taken by the District to address the backlog include revising outdated procedures for permit review to better utilize technology, developing new guidelines and training additional staff to process

Title V permits, and assignment of permit applications across multiple engineers (in the past, most Title V applications were processed by a single engineer). The District has also added 2 additional positions in the engineering department to dedicate more resources to the permitting program.

Additionally, the District notes that when resources are impacted, past focus has been on the local permitting program, which is conducted under SIP approved rules and regulations and results in the issuance of federally enforceable permits that ensure compliance with all applicable requirements for each emission unit.

11. Any additional comments on permit preparation or content?

B. General Permits (GP)

1. Do you issue general permits? Y ☐ N ☒
 - a. If no, go to next section
 - b. If yes, list the source categories and/or emission units covered by general permits.
2. In your agency, can a title V source be subject to multiple general permits and/or a general permit and a standard “site-specific” title V permit? Y ☐ N ☐
 - a. What percentage of your title V sources have more than one general permit?
3. Do the general permits receive public notice in accordance with 70.7(h)? Y ☐ N ☐
 - a. How does the public or regulated community know what general permits have been written? (e.g., are the general permits posted on a website, available upon request, published somewhere?)
4. Is the 5-year permit expiration date based on the date:
 - a. The general permit is issued? Y ☐ N ☐
 - b. You issue the authorization for the source to operate under the general permit? Y ☐ N ☐
5. Any additional comments on general permits?

C. Monitoring

1. How do you ensure that your operating permits contain adequate monitoring (i.e., the monitoring required in §§ 70.6(a)(3) and 70.6(c)(1)) if monitoring in the underlying standard is not specified or is not sufficient to demonstrate compliance?

SDAPCD reviews monitoring requirements at the stage the emission unit specific permits are issued, which results in the vast majority of emission units having federally enforceable monitoring prior to being included in the Title V permit. Monitoring is reviewed for each emission unit and is a standard part of the review process for all applications to ensure that each requirement has a monitoring and record keeping mechanism.

- a. Have you developed criteria or guidance regarding how monitoring is selected for permits? If yes, please provide the guidance. Y ☐ N ☒

While we do not have specific guidance on monitoring, we utilize standard procedures as part of the permit review process to ensure that proper monitoring is included in the permit. This includes utilizing standard sets of permit conditions that have been found to have adequate monitoring, basing unique monitoring conditions on comparable standards in prohibitory rules, NSPS, NESHAP or other relevant examples, and a required review by compliance personnel for each set of permit conditions, which focuses on enforceability, including monitoring requirements.

2. Do you provide training to your permit writers on monitoring? (e.g., periodic and/or sufficiency monitoring; CAM; monitoring QA/QC procedures including for CEMS; test methods; establishing parameter ranges) Y ☒ N ☐

3. How often do you “add” monitoring not required by underlying requirements? Have you seen any effects of the monitoring in your permits such as better source compliance?

The District frequently adds monitoring, most commonly for emission limits or permit conditions implemented through local NSR. In these cases, monitoring usually mirrors similar underlying requirements where monitoring is required. Monitoring likely results in additional non-compliance simply because the additional requirements for monitoring may lead to more possibilities to not comply with the monitoring requirement, but may not necessarily translate into emissions exceedances or emission limit violations. However, the District expects the additional monitoring does result in lowered emissions and better compliance with underlying standards that otherwise would not be detected as non-compliant.

4. What is the approximate number of sources that now have CAM monitoring in their permits? Please list some specific sources.

In current staff's experience, we do not have many, if any, sources that have CAM monitoring. This is primarily due to these sources being subject to monitoring that exempts them from CAM.

5. Has the District ever disapproved a source's proposed CAM plan?

In current staff's experience, we have not reviewed any proposed CAM plans, so have not had cause to disapprove or approve any plan.

D. Public Participation and Affected State Review

Public Notification Process

1. Which newspapers does the District use to publish notices of proposed title V permits?

San Diego Union Tribune

2. Do you use a state publication designed to give general public notice? Y ☐ N ☒

3. Do you sometimes publish a notice for one permit in more than one paper? Y ☐ N ☒

Explanation: This District doesn't find newspapers notices a very effective form of outreach. This District utilizes its GovDelivery subscription service to notify the public and stakeholders. It also posts all notifications on its website.

- a. If so, how common is it for the District to publish multiple notices for one permit?

- b. How do you determine which publications to use?

Only available publication with sufficient circulation.

- c. What cost-effective approaches have you utilized for public publication?

Notices are published on the District's website and sent to established email distribution lists for those with Title V interest. Most, if not all, engagement the District receives from the public on Title V is through an electronic method of notification.

4. Have you developed mailing lists of people you think might be interested in title V permits you propose? [e.g., public officials, environmentalists, concerned citizens] Y ☒ N ☐

Note: it is an email list, not a physical mailing list.

- a. Does the District maintain more than one mailing list for title V purposes, e.g., a general title V list and source-specific lists? Y ☐ N ☒

- b. How does a person get on the list? (e.g., by calling, sending a written request, or filling out a form on the District's website)

Through the District's website.

- c. How does the list get updated?

Automatically when users register.

- d. How long is the list maintained for a particular source?

There are no lists for specific sources

- e. What do you send to those on the mailing list?

They receive a brief explanation of the source and Title V action, and links to view the full public notice, proposed permit, application forms and statement of basis posted on the District's website.

5. Do you reach out to specific communities (e.g., environmental justice communities) beyond the standard public notification processes? Y ☐ N ☒

In our experience, most interested environmental justice communities utilize the existing automated email notification lists to be notified of Title V actions. The District is currently developing a public participation plan to enhance public outreach and it is implementing multiple requirements from AB423 that promote transparency and public engagement.

6. Do your public notices clearly state when the public comment period begins and ends? Y ☒ N ☐

7. What is your opinion on the most effective methods for public notice?

Electronic. The District find that the required newspaper notice is not effective.

8. Do you provide notices in languages besides English? Please list the languages and briefly describe under what circumstances the District translates public notice documents? Y ☐ N ☒

While notices are not provided in other languages the District does have staff to provide information in other languages as needed. The District will be evaluating its public notices under the public participation plan.

Public Comments

9. How common has it been for the public to request that the District extend a public comment period?

Rarely, if ever since the District has not received requests for extending the public comment period. The District has extended comment periods for major NSR permits on a few occasions. Current staff is not aware of any instances where an extension of a Title V comment period was requested.

- a. Has the District ever denied such a request? Y ☐ N ☒

- b. If a request has been denied, what were the reason(s)?

If mirroring past practice for requested NSR permits, extensions are generally granted in most cases to encourage public involvement.

10. Has the public ever suggested improvements to the contents of your public notice, improvements to your public participation process, or other ways to notify them of draft permits? If so, please describe.

Y ☐ N ☒

11. Approximately what percentage of your proposed permits has the public commented on?

We estimate about 5%, no more than 10%.

12. Over the years, has there been an increase in the number of public comments you receive on proposed title V permits? Y ☐ N ☒

13. Have you noticed any trends in the type of comments you have received? **Y**☒ **N** ☐

Please explain.

We haven't observed a sufficient trend to make any conclusions, but the most recent comments have focused on toxic pollutant impacts, cumulative emission impacts from closely located sources, and other issues that aren't directly addressable through the Title V program.

a. What percentage of your permits change due to public comments?

The District is not aware of ever changing a Title V permit after public comment other than comments provided by the permittee. However, the District has on occasion changed conditions after public comments during review for a major source NSR permit. This has only occurred rarely (<5-10%) and was related to revising BACT requirements and related emission limits on new power plants.

14. Have specific communities (e.g., environmental justice communities) been active in commenting on permits? **Y** ☐ **N** ☒

15. Do your rules require that any change to the draft permit be re-proposed for public comment? **Y** ☐ **N** ☒

Explanation: We do not require re-proposal if the changes are administrative or sufficiently minor that a commentor would not be expected to view the changes as substantive.

a. If not, what type of changes would require you to re-propose (and re-notice) a permit for comment?

Any change that we believe is at all substantive or is noted by EPA to require re-noticing would result in the District re-proposing the permit. In the past we have few examples of changing permits, but have generally deferred to conducting a re-proposal in any questionable case.

EPA 45-day Review

16. What permit types do you send to the EPA for 45-day review?

Initial, Renewal, Major Modification, Minor Modification, Enhanced Authority to Construct

17. Do you have an arrangement with the EPA region for its 45-day review to start at the same time the 30-day public review starts? (aka "concurrent review") **Y**☒ **N** ☐

Explanation: Our rules allow for concurrent review and it is our practice to conduct review concurrently. We also typically consult EPA prior to proposing for any questionable permit decisions to prevent need to make changes and re-notice.

a. What could cause the EPA 45-day review period to restart (i.e., if public comments received, etc)?

We are not aware of any situation where the period needed to be restarted, but we would restart any time that we intend to change the permit and EPA concurs with the need for the review period to restart.

b. How does the public know if the EPA's review is concurrent?

They could determine this either by seeing and reviewing the rules stating that this is allowable, or by contacting the District to inquire.

- c. If the District does concurrent review, is this process a requirement in your title V regulations, or a result of a MOA or some other arrangement?

It is an optional part of regulations and a practice the District considers improves and helps with streamlining of the permit process.

Permittee Comments

18. Do you work with permittees prior to public notice? **Y**☒ **N** ☐

19. Do permittees provide comments/corrections on the permit during the public comment period? **Y**☒ **N** ☐

Explanation: We encourage permittees to provide comments prior to public notice so that any changes such as typographical or errors can be made without requiring re-noticing to correct. In the majority of cases this occurs, but in at least one occasion a source has provided substantial comments afterwards. Additionally, permittees will normally have already reviewed the equipment specific permit conditions when the operating permit is issued, so this reduces the need for comment.

- a. Any trends in the type of comments?
None of note.
- b. How do these types of comments or other permittee requests, such as changes to underlying NSR permits, affect your ability to issue a timely permit?

In our experience this happens rarely, but when it does it has significantly impacted the timely issuance of the permit. District staff has recently reviewed the past case where this occurred and staff expects in the future to have more defined standards for which requests can be entertained and which should be denied due to the review requirement under the local permit program prior to integration with the Title V permit.

Public Hearings

20. What criteria does the District use to decide whether to grant a request for a public hearing on a proposed title V permit? Are the criteria described in writing (e.g., in the public notice)?

We do not have a written policy, but would only grant a request if the commentor raised a specific issue pertinent to the Title V permit that would require change of the requirements in the permit or raising a concern that could result in denying the permit. Current staff is not aware of any requests for a public hearing in the past 5 years. We recently received an inquiry from a community member regarding a request for a public comment, but after explaining to them that the issue identified could not be well addressed through Title V (cumulative health risk impacts from various sources in a low income community), no formal request for a hearing was made.

- a. Do you ever plan the public hearing yourself, in anticipation of public interest? **Y** ☐ **N** ☒

We have not in the past, but it is a possibility if warranted for a specific project.

Availability of Public Information

21. Do you charge the public for copies of permit-related documents? **Y** ☐ **N** ☒

- a. If yes, what is the cost per page? N/A
- b. Are there exceptions to this cost (e.g., the draft permit requested during the public comment period, or for non-profit organizations)? **Y** ☐ **N** ☒
- c. Do your title V permit fees cover this cost? **Y** ☒ **N** ☐ If not, why not?

22. What is your process for the public to obtain permit-related information (such as permit applications, draft permits, deviation reports, 6-month monitoring reports, compliance certifications, statement of basis) especially during the public comment period?

A public information request (PIR) can be filed in person, over the phone or electronically for these documents. Some (applications, draft permit, statement of basis) are available online during the comment period. Additionally the District is implementing requirements under AB423 that includes publishing permitting datasets on its website.

- a. Are any of the documents available locally (e.g., public libraries, field offices) during the public comment period? **Y** ☐ **N** ☒ **Please explain.**

They are available online, but not physically.

23. How long does it take to respond to requests for information for permits in the public comment period?

For information that is readily available, records are typically available within a few days. High priority is given to responding to these requests. Information that is not readily available (i.e. requires data analysis or processing or has been archived) may take longer.

24. Have you ever extended your public comment period as a result of requests for permit-related documents? **Y** ☐ **N** ☒

This situation has not occurred, but we likely would in the event that we experienced a delay responding to an information request or there was justification for allowing longer period to review.

25. Do information requests, either during or outside of the public comment period, affect your ability to issue timely permits? **Y** ☐ **N** ☒

26. What title V permit-related documents does the District post on its website (e.g., proposed and final permits, statements of basis, public notice, public comments, responses to comments)?

Proposed permit, statement of basis, public notice, applications. Additionally, as required by AB423, the District recently began making available the application files for all local permit applications under review, which would include those located at Title V facilities.

- a. How often is the website updated? Is there information on how the public can be involved?

It is updated as necessary when a public notice is initiated. There is information on how to submit comments. The District is currently undergoing a large scale revamp of the website (required by AB423) and this will result in additional information available for Title V in a more user-friendly platform.

- b. Do you provide public commenters with final Title V permit documents?

Only upon request or if relevant in responding to comment.

27. Have other ideas for improved public notification, process, and/or access to information been considered?
Y ☒ N ☐ If yes, please describe.

The District is currently developing a Public Participation Plan that will detail communication and engagement strategies to inform and increase public participation. The Public Participation Plan will be considered for adoption by the District's Governing Board in early 2022.

28. Do you have a process for notifying the public as to when the 60-day citizen petition period starts?
Y ☐ N ☒ If yes, please describe.

29. Do you have any resources available to the public on public participation (booklets, pamphlets, webpages)?
Y ☒ N ☐

The District is currently developing a Public Participation Plan that will detail communication and engagement strategies to inform and increase public participation. The Public Participation Plan will be considered for adoption by the District's Governing Board in early 2022.

30. Do you provide training to citizens on public participation or on title V? **Y ☐ N ☒**

The District is currently developing a Public Participation Plan that will detail communication and engagement strategies to inform and increase public participation. The Public Participation Plan will be considered for adoption by the District's Governing Board in early 2022.

31. Do you have staff dedicated to public participation, relations, or liaison? **Y ☒ N ☐**

- a. Where are they in the organization?

The District has a program coordinator position (currently vacant and in the process of being filled) to serve as the APCD Public Information Officer and Outreach Coordinator. This position is under the Office of Environmental Justice and it reports to the Deputy Director overseeing that office.

- b. What is their primary function?

To be a spokesperson for APCD, manage media relations, and coordinate outreach activities to increase public participation and engagement.

Affected State Review and Review by Indian Tribes

32. How do you notify tribes of draft permits?

Tribes are notified electronically using list of tribes and contact information provided by EPA. One tribe does not have an email contact, so the notices are mailed.

33. Has the District ever received comments on proposed permits from Tribes?

The District has not recently received any comments from tribes on Title V permits in current staff's experience. However, the District has received comments on a proposed NSR permit for a landfill and the project was ultimately withdrawn prior to approval.

34. Please provide any suggestions for improving your notification process.

The goal of the public participation plan is to identify the needs and interest of the public and develop strategies to meet these expectations. As it relates to permitting actions, presenting information in a clear and concise manner is critical.

35. Any additional comments on public notification?

E. Permit Issuance / Revision / Renewal

Permit Revisions

1. For which types of permit modifications do you follow a list or description in your regulations to determine the appropriate process to follow: **(Check all that apply)**

- ☒ Administrative amendment?
- ☒ Section 502(b)(10) changes?
- ☒ Significant and/or minor permit modification?
- ☐ Group processing of minor modifications?

2. Approximately how many title V permit revisions have you processed for the last five years? 25

- a. What percentage of the permit revisions were processed as:

Significant:	0
Minor:	0
Administrative:	60%
Off-permit:	0
502(b)(10):	40%

The percentage provided above represents the applications received and approved for the last five years. It does not include all applications received for the last five years that are pending approval. Some of the applications pending approval are for minor modifications and are for facilities that subject to renewal. The District has been processing these minor modification applications at the same time as the renewal permit is being issued to promote efficiencies.

3. For the last five years, how many days, on average, does it take to process (from application receipt to final permit revision):

- a. A significant permit revision?
- b. A minor revision?

No data. We have no data on this because we have not approved any of the above application types. No significant mods have been received and minor mods are either delayed so they can be included with renewals or the underlying projects have not been constructed or started operation.

4. How common has it been for the District to take longer than 18 months to issue a significant revision, 90 days for minor permit revisions, and 60 days for administrative amendments? Please explain.

Due to the backlog described under question 10, the District has in some cases exceeded these timelines. However, with recent changes to the Title V procedures and staff assignments, we are confident that we will quickly resume timely processing of Title V permit revisions.

5. What have you done to streamline the issuance of revisions?

Due to the delay in processing revisions, the District has relied on the strategy of combining multiple reviews with the renewal. This also has the advantage of minimizing the amount of time spent on the

projects since many of the steps are the same whether a permitting action includes one or multiple revisions.

6. What process do you use to track permit revision applications moving through your system?

The District uses a system called the Business Case Management System (BCMS) created by Accela. This system allows for the generation of reports and searching of records that allows for easy tracking of permit applications and modification status.

7. Have you developed guidance to assist permit writers and sources in evaluating whether a proposed revision qualifies as an administrative amendment, off-permit change, significant or minor revision, or requires that the permit be reopened? **Y**☒ **N** ☐ **If so, please provide a copy.**

8. Do you require that applications for minor and significant permit modifications include the source's proposed changes to the permit? **Y** ☐ **N** ☒

Typically, all minor and significant permit modifications require that the applicant first obtains a modified authority to construct or permit to operate through the local permitting program prior to applying for the Title V change. In practice, most permittees apply at the same time, so the District waits to process the Title V application until the local permit is issued so that the conditions in that permit can serve as the proposed conditions. This approach minimizes the need to renotify or repropose if changes are required after construction (e.g. removal of initial testing requirements or alteration of monitoring requirements based on observed operation).

- a. For minor modifications, do you require sources to explain their change and how it affects their applicable requirements? **Y** ☐ **N** ☒

Many sources do, but frequently they prefer to rely on the District's determination of how changes will apply.

9. Do you require applications for minor permit modifications to contain a certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used? **Y**☒ **N** ☐

10. When public noticing proposed permit revisions, how do you identify which portions of the permit are being revised? (e.g., narrative description of change, highlighting, different fonts).

Narrative description.

11. When public noticing proposed permit revisions, how do you clarify that only the proposed permit revisions are open to comment?

Narrative description of what the project entails, and clarification if a comment is submitted regarding a portion of the permit that is not open for comment.

Permit Renewal or Reopening

12. Do you have a different application form for a permit renewal compared to that for an initial permit application? **Y** ☐ **N** ☒

- a. If yes, what are the differences?

13. Has issuance of renewal permits been “easier” than the original permits?

Y ☒ **N** ☐ **Please explain.**

In most cases, the renewal permit is based on the original permit, resulting in less time spent establishing requirements. However, in a few limited circumstances a facility with many emission units may have experienced so many changes that there is minimal reduction in effort to issue the renewal permit.

14. How are you implementing the permit renewal process (ie., guidance, checklist to provide to permit applicants)? **Y** ☐ **N** ☐

The District provides a standard application package online. Facilities subject to permit renewals must submit complete applications with the required fees.

15. What **percentage** of renewal applications have you found to be timely and complete for the last five years?

SDAPCD is only aware of two instances in the last 5 years where an application was not timely and complete, which equates to < 10% of applications.

16. How many complete applications for renewals do you presently have in-house ready to process?

We currently have 21 open renewals, of which we expect all are complete (not all have had a completeness determination).

- a. Have you been able to or plan to process these renewals within the part 70 timeframe of 18 months? If not, what can EPA do to help? **Y** ☐ **N** ☒

The District’s current backlog of Title V renewals is primarily due to competing priorities and need to temporarily focus staff resources in other areas (emission inventory, air toxic hot spots, AB423/AB617). However, these projects are winding down and a revised process for assigning Title V renewals to a larger group of staff has recently been implemented which should allow the District to return to timely application processing.

17. Have you ever determined that an issued permit must be revised or revoked to assure compliance with the applicable requirements? **Y** ☐ **N** ☒

F. Compliance

Deviations

1. Deviation reporting:

- a. Please describe which deviations you require be reported prior to the semi-annual monitoring report?

Breakdowns can be reported within two hours of detection. Deviations that are not due to a breakdown, but which result in excess emissions specific to cogens and powerplants must be reported within 10 calendar days of detection.

- b. Do you require that some deviations be reported by telephone? Y ☐ N ☒

Breakdowns can be reported by telephone or electronically via Accela Citizen Access (online account created by facility).

- c. If yes, do you require a follow-up written report? Y ☒ N ☐ If yes, within what timeframe?

A follow-up written report is required for breakdowns within 15 calendar days after the breakdown occurrence has been corrected.

- d. Do you require that all deviation reports be certified by a responsible official? (If no, describe which deviation reports are not certified). Y ☐ N ☒

Self-reported deviations that occur prior to the semi-annual monitoring reports can be submitted by Environmental staff, which may not be the responsible officials.

- i. Do you require certifications to be submitted with the deviation report? Y ☐ N ☒

- ii. If not, do you allow the responsible official to “back certify” deviation reports? Y ☐ ☒ N ☐

The responsible official certifies deviation reports when the semi-annual monitoring reports and the annual compliance certifications are submitted. If this is considered “back certifying” then yes.

- iii. If you allow the responsible official to “back certify” deviation reports, what timeframe do you allow for the follow-up certifications (e.g., within 30 days; at the time of the semi-annual deviation reporting)?

The responsible official must certify at the time of the semi-annual deviation reporting.

2. How does your program define deviation?

Any violation of permit conditions, rules or regulations that are federally-enforceable.

3. Do you require only violations of permit terms to be reported as deviations? Y ☐ N ☒

4. Which of the following do you require to be reported as a deviation (**Check all that apply**):

- ☒ Excess emissions excused due to emergencies (pursuant to 70.6(g))
- ☒ Excess emissions excused due to SIP provisions (**cite the specific state rule**)
- ☒ Excess emissions allowed under NSPS or MACT SSM provisions
- ☒ Excursions from specified parameter ranges where such excursions are not a monitoring violation (as defined in CAM)
- ☒ Excursions from specified parameter ranges where such excursions are credible evidence of an emission violation

Failure to collect data/conduct monitoring where such failure is “excused”:

- ☐ During scheduled routine maintenance or calibration checks
- ☐ Where less than 100% data collection is allowed by the permit
- ☒ Due to an emergency
- ☐ Other? **Describe.**

5. Do your deviation reports include:

- a. The probable cause of the deviation? Y ☒ N ☐
- b. Any corrective actions taken? Y ☒ N ☐
- c. The magnitude and duration of the deviation? Y ☒ N ☐

6. Do you define “prompt” reporting of deviations as more frequent than semi-annual? Y ☒ N ☐

7. Do you require a written report for deviations? Y ☒ N ☐

8. Do you require that a responsible official certify all deviation reports? Y ☒ N ☐

Compliance Reports

9. What is your procedure for reviewing and following up on:

- a. Deviation reports? Y ☒ N ☐
- b. Semi-annual monitoring reports? Y ☒ N ☐
- c. Annual compliance certifications? Y ☒ N ☐

10. Please identify the **percentage** of the following reports you review:

- a. *Deviation reports – 100%*
- b. *Semi-annual monitoring reports – 100%*
- c. *Annual compliance certification – 100%*

11. Compliance certifications

- a. Have you developed a compliance certification form? Y ☒ N ☐ If no, go to question 12.
 - i. Is the certification form consistent with your rules? Y ☒ N ☐
 - ii. Is compliance based on whether compliance is continuous or intermittent or whether the compliance monitoring method is continuous or intermittent?

Both

iii. Do you require sources to use the form? Y ☒ N ☐ If not, what percentage do?

iv. Does the form account for the use of credible evidence? Y ☐ N ☒

v. Does the form require the source to specify the monitoring method used to determine compliance where there are options for monitoring, including which method was used where more than one method exists? Y ☒ N ☐

12. Is your compliance certification rule based on:

- a. The '97 revisions to part 70 - i.e., is the compliance certification rule based on whether the compliance monitoring method was continuous or intermittent; ☐
- OR**
- b. The '92 part 70 rule - i.e., is the compliance certification rule based on whether compliance was continuous or intermittent? ☒

Excess Emissions

13. Does your program include an emergency defense provision as provided in 70.6(g)? Y ☐ N ☒ If yes, does it:

- a. Provide relief from penalties? Y ☐ N ☐
- b. Provide injunctive relief? Y ☐ N ☐
- c. Excuse non-compliance? Y ☐ N ☐

14. Does your program include a SIP excess emissions provision? Y ☐ N ☒ If no, go to 10.c. If yes does it:

- a. Provide relief from penalties? Y ☐ N ☐
- b. Provide injunctive relief? Y ☐ N ☐
- c. Excuse noncompliance? Y ☐ N ☐

15. Do you require the source to obtain a written concurrence from the District before the source can qualify for:

To our knowledge, a source has never requested these provisions, therefore a written concurrence has not been necessary.

- a. The emergency defense provision? Y ☐ N ☐
- b. The SIP excess emissions provision? Y ☐ N ☐
- c. NSPS/NESHAP SSM excess emissions provisions? Y ☐ N ☐

16. Any additional comments on compliance?

G. Resources & Internal Management Support

1. Are there any competing resource priorities for your “title V” staff in issuing title V permits? **Y**☒ **N** ☐

a. If so, what are they?

Currently the largest competing priorities are the implementation of the Hot Spots Program and implementations of the requirements under AB 423. Other previous efforts such as development of an emission inventory system, implementation of AB617, which primarily focuses on environmental justice issues, contributed to the application backlog. However, the District has implemented processes to address this backlog.

2. Are there any initiatives instituted by your management that recognize/reward your permit staff for getting past barriers in implementing the title V program that you would care to share? **Y**☐ **N** ☒

There are no initiatives specific for the Title V program but the District has an employee recognition award program to recognize staff. The leadership team also recognizes accomplishments from staff.

3. How is management kept up to date on permit issuance?

SDAPCD’s permit system (BCMS) allows for sorting and searching records, as well as preparation of reports that show up to date status of all applications.

4. Do you meet on a regular basis to address issues and problems related to permit writing? **Y**☒ **N** ☐

5. Do you charge title V fees based on emission rates? **Y**☐ **N** ☒

a. If not, what is the basis for your fees?

Time and material basis. Permits are also assessed a separate emission fee based on emission rate, but this is not specific to Title V facilities.

b. What is your title V fee?

Time and Material fees as specified in District Rule 40.

c. Do you have sources that refuse to pay their title V fee? **Y**☐ **N** ☒ How do you approach these situations?

6. How do you track title V expenses?

Labor data are maintained in the BCMS permit system of actual time spent.

7. How do you track title V fee revenue?

Title V revenues are tracked as part of regular permit charges, for those facilities that are subject to Title V Operating Permits and can be identified as Title V through a report from the permits database (BCMS).

8. How many title V permit writers does the agency have on staff (number of FTE’s, both budgeted and actual)?

Engineering Division has 17 Permit Engineer positions. Two of these positions are currently vacant but in the process of being filled. All engineers can work on District and Title V permits.

9. Do the permit writers work full time on title V? **Y**☐ **N** ☒

- a. *If not, describe their main activities and percentage of time on title V permits.*
Main activities are local permit review.
Estimate 5-10% of time spent on Title V specific applications on average. Additionally, much of the local permit work at Title V facilities is utilized in preparing the Title V permits.
- b. How do you track the time allocated to Title V activities versus other non-title V activities?
Labor data is kept in BCMS.
10. Are you currently fully staffed?
No, but are actively working to hire to fill the open positions.
11. What is the ratio of permits to Title V permit writers?
Approximately 4 permits per employee who currently works on Title V permitting. However, each employee is only spending a small percentage of his/her time on Title V applications.
12. Describe staff turnover.
In the last year, staff turnover has been approximately 50% in the permitting group.
- a. How does this impact permit issuance?
This has a significant impact on permit issuance since due to required training on the Title V program and District rules.
- b. How does the permitting authority minimize turnover?
The District offers flexible schedules, such as 4/10 schedules, teleworking schedules, opportunities for advancements, job shadowing program, and training opportunities.
13. Do you have a career ladder for permit writers? **Y ☒ N ☐** **If so, please describe.**
The District uses the following structure: Junior Engineer, Assistant Engineer, Associate Engineer, Senior Engineer, Chief. New hires are typically made at the assistant and junior levels.
14. Do you have the flexibility to offer competitive salaries? **Y ☐ N ☐**
SDAPCD employees are still County employees. The salary ranges are established by County through labor negotiations. When hiring new employees the District has some flexibility to offer a starting salary within the specified range based on previous experience and qualifications.
The District has also offered a flex schedule that includes a 4/10 option and various start time, as well as integrated teleworking opportunities to offer additional benefits to its employees.
15. Can you hire experienced people with commensurate salaries? **Y ☐ N ☐**
When hiring new employees the District has some flexibility to offer a starting salary within the specified range based on previous experience and qualifications.
16. Describe the type of training given to your new and existing permit writers.
District staff primarily receive training in equipment types, pollutant types, and applicable rules from the state (CARB) or EPA and through WESTAR coordinated training sponsored by EPA. Additionally, the engineering division periodically conducts its own trainings for some or all staff. Staff also are expected to learn through experience and start working on less complex applications quickly after hiring with oversight from their supervisors and/or more experienced engineers.
17. Does your training cover:

- a. How to develop periodic and/or sufficiency monitoring in permits? **Y**☒ **N** ☐
- b. How to ensure that permit terms and conditions are enforceable as a practical matter? **Y**☒ **N** ☐
- c. How to write a Statement of Basis? **Y**☒ **N** ☐

18. Please describe anything that EPA can do to assist/improve your training.

Training opportunities are always beneficial

19. How has the District organized itself to address title V permit issuance?

The Engineering Division is responsible for reviewing permit applications and issuing permits. The District does not have a separate group for Title V permits.

20. Overall, what is the biggest internal roadblock to permit issuance from the perspective of Resources and Internal Management Support?

Policies and Procedures in the Engineering Division had not been revised for 5 years, resulting in a lack of guidance for staff. Since last year the District has been actively revising and creating new procedures as well as providing training to staff to increase resources for Title V and other programs.

Another challenge the division faced is related to the backlog associated with the Emission Inventory and AB2588 programs, which took resources away from the permitting program.

Other barriers that have contributed to delays include new team members that have not been fully trained.

Environmental Justice Resources

21. Do you have Environmental Justice (EJ) legislation, policy or general guidance which helps to direct permitting efforts? **Y** ☐ **N** ☒ If so, may EPA obtain copies of this information?

While there's currently no specific EJ guidance to direct permitting efforts, the APCD Board established an office of Environmental Justice in late 2020 with 0.5 FTE dedicated to oversee EJ activities and 1 FTE dedicated to public outreach (currently vacant). Since then, the Office of EJ has been mainly dedicated to manage the implementation of the State's Community Air Protection Program (AB617). APCD's Office of EJ is currently working on developing a framework to provide EJ training to APCD staff as well as define strategies to engage with EJ communities in the San Diego region.

22. Do you have an in-house EJ office or coordinator, charged with oversight of EJ related activities? **Y**☒ **N** ☐

The APCD Board established an office of Environmental Justice in late 2020 with 0.5 FTE dedicated to oversee EJ activities and 1 FTE dedicated to public outreach (currently vacant). Since then, the Office of EJ has been mainly dedicated to manage the implementation of the State's Community Air Protection Program (AB617). APCD's Office of EJ is currently working on developing a framework to provide EJ training to APCD staff as well as define strategies to engage with EJ communities in the San Diego region.

23. Have you provided EJ training / guidance to your permit writers? **Y** ☐ **N** ☒

While there's currently no specific EJ guidance to direct permitting efforts, the APCD Board established an office of Environmental Justice in late 2020 with 0.5 FTE dedicated to oversee EJ activities and 1 FTE dedicated to public outreach (currently vacant). Since then, the Office of EJ has been mainly dedicated to manage the implementation of the State's Community Air Protection Program (AB617). APCD's Office of EJ is currently working on developing a framework to provide EJ training to APCD staff as well as define strategies to engage with EJ communities in the San Diego region.

24. Do the permit writers have access to demographic information necessary for EJ assessments? (e.g., socioeconomic status, minority populations, etc.) **Y** ☒ **N** ☐

Engineers have access to CalEnviroScreen, which is a science-based mapping tool available to staff that scores California communities by census tract based on environmental, health, and socioeconomic data. These scores help identify disadvantaged communities where environmental justice issues are prevalent. Census information on demographics is also available to help complement CalEnviroScreen data.

25. When reviewing an initial or renewal application, is any screening for potential EJ issues performed? **Y** ☐ **N** ☒ If so, please describe the process and/or attach guidance.

Because SDAPCD's rules do not have separate requirements based on whether or not a facility is located in an EJ area, we have not identified a need for such screening.

H. Title V Benefits

1. Does your staff implementing the title V program generally have a better understanding of:
 - a. NSPS requirements? **Y**☒ **N** ☐
 - b. The stationary source requirements in the SIP? **Y**☒ **N** ☐
 - c. The minor NSR program? **Y**☒ **N** ☐
 - d. The major NSR/PSD program? **Y**☒ **N** ☐
 - e. How to design monitoring terms to assure compliance? **Y**☒ **N** ☐
 - f. How to write enforceable permit terms? **Y**☒ **N** ☐
2. In issuing initial title V permits:
 - a. Have you noted inconsistencies in how sources had previously been regulated (e.g., different emission limits or frequency of testing for similar units)? **Y** ☐ **N** ☒ If yes, describe.
 - b. Have you taken (or are you taking) steps to assure better regulatory consistency within source categories and/or between sources? **Y** ☐ **N** ☒ If yes, describe.
3. Based on your experience, estimate the frequency with which potential compliance problems are identified through the permit issuance process:

Never Occasionally Frequently Often

- | | | | | |
|---------------------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a. Prior to submitting an application | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Prior to issuing a draft permit | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. After issuing a final permit | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
4. Based on your experience with sources addressing compliance problems identified through the title V permitting process, estimate the general rate of compliance with the following requirements prior to implementing title V:

This information is not available prior to implementation of Title V. Currently, occasionally there are compliance issues identified related to NSPS applicability.

Never Occasionally Frequently Often

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|--------------------------|
| a. NSPS requirements
(including failure to identify an NSPS as applicable) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. SIP requirements | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Minor NSR requirements
(including the requirement to obtain a permit) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Major NSR/PSD requirements
(including the requirement to obtain a permit) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

5. Do you see a difference in compliance behavior on the part of sources that have to comply with the title V program? **(Check all that apply.)**

- ☒ Increased use of self-audits?
- ☒ Increased use of environmental management systems?
- ☒ Increased staff devoted to environmental management?
- ☒ Increased resources devoted to environmental control systems (e.g., maintenance of control equipment; installation of improved control devices; etc.)?
- ☒ Increased resources devoted to compliance monitoring?
- ☒ Better awareness of compliance obligations?
- ☐ Other? Describe.

6. Does implementation of the title V program improve other areas of your program? **(Check all that apply.)**

- ☐ Netting actions
- ☒ Emission inventories
- ☐ Past records management (e.g., lost permits)
- ☒ Enforceability of PTE limits (e.g., consistent with guidance on enforceability of PTE limits such as the June 13, 1989 guidance)
- ☐ Identifying source categories or types of emission units with pervasive or persistent compliance problems; etc.
- ☐ Clarity and enforceability of NSR permit terms
- ☒ Better documentation of the basis for applicable requirements (e.g., emission limit in NSR permit taken to ☐ avoid PSD; throughput limit taken to stay under MACT threshold)
- ☐ Emissions trading programs
- ☐ Emission caps
- ☐ Other (describe)

Because of the robustness of the District's local permitting program, Title V has less of an impact than it would otherwise.

7. If yes to any of the above, would you care to share how the title V program improves other aspects of your air program? (e.g., increased training; outreach; targeted enforcement)?

Increased recordkeeping and outreach opportunities

8. Are there aspects of the title V program that you have extended to other program areas (e.g., require certification of accuracy and completeness for pre-construction permit applications and reports; increased records retention; inspection entry requirement language in NSR permits). **Y** ☐ **N** ☒ **If yes, describe.**

While the local permit program does share many of the same concepts as Title V, current staff do not believe that these resulted from Title V specifically.

9. Have you made changes in how NSR permits are written and documented as a result of lessons learned in title V (e.g., permit terms more clearly written; use of a statement of basis to document decision making)? If yes, describe.

While the local permit program does share many of the same concepts as Title V, current staff do not believe that these resulted from Title V specifically.

10. Do you use information from title V to target inspections and/or enforcement? **Y**☒ **N** ☐

11. Is title V fee money helpful in running the program? That is, does it help you to provide: **(Check all that apply.)**

- ☒ Better training?
- ☒ More resources for your staff such as CFRs and computers?
- ☒ Better funding for travel to sources?
- ☐ Stable funding despite fluctuations in funding for other state programs?
- ☒ Incentives to hire and retain good staff?
- ☐ Are there other benefits of the fee program? Describe.

12. Have you received positive feedback from citizens? **Y** ☐ **N** ☒

13. Has industry expressed a benefit of title V? **Y** ☐ **N** ☒ If so, describe.

14. Do you perceive other benefits as a result of the title V program? **Y**☒ **N** ☐ If so, describe.
Increased oversight

15. Other comments on benefits of title V? **Y**☒ **N** ☐

Because of the nature of the District's local permit program which implements a significant amount of the same requirements as Title V, the benefits of Title V are limited to those areas that are not reflected in the normal process (public comment, deviation reporting)

Good Practices not addressed elsewhere in this questionnaire

16. Are any practices employed that improve the quality of the permits or other aspects of the title V program that are not addressed elsewhere in this questionnaire? *No*

EPA assistance not addressed elsewhere in this questionnaire

17. Is there anything else EPA can do to help your title V program?

EPA staff has been always available when needed for questions and general assistance, which is greatly appreciated.

Appendix C. U.S. EPA Statement of Basis Guidance

Table of SOB guidance

Elements	Region 9's Febuary 19, 1999 letter to SLOC APCD	NOD to Texas' part 70 Program (January 7, 2002)	Region 5 letter to state of Ohio (December 20, 2001)	Los Medanos Petition Order (May 24, 2004)	Bay Area Refinery Petition Orders (March 15, 2005)	EPA's August 1, 2005 letter regarding Exxon Mobil proposed permit	Petition No. V-2005-1 (February 1, 2006) (Onyx Order)	EPA's April 30, 2014 Memorandum: Implementation Guidance on ACC Reporting and SOB Requiremetns for Title V Operating Permits
New Equipment	Additions of permitted equipment which were not included in the application					√		
Insignificant Activities and portable equipment	Identification of any applicable requirements for insignificant activities or State-registered portable equipment that have not previously been identified at the Title V facility					√		
Streamlining	Multiple applicable requirements streamlining demonstrations		Streamlining requirements	Streamlining analysis		√		
Permit Shields	Permit shields	The basis for applying the permit shield	√	Discussion of permit shields	Basis for permit shield decisions	√		
Alternative Operating Scenarios and Operational Flexibility	Alternative operating scenarios	A discussion of any operational flexibility that will be utilized at the facility.	√			√		
Compliance Schedules	Compliance Schedules				Must discuss need for compliance schedule for multiple NOVs, particularly any unresolved/outstanding NOVs	Must discuss need for compliance schedule for any outstanding NOVs		
CAM	CAM requirements					√		
PALs	Plant wide allowable emission limits (PAL) or other voluntary limits					√		
Previous Permits	Any district permits to operate or authority to construct permits		Explanation of any conditions from previously issued permits that are not being transferred to the title V permit	A basis for the exclusion of certain NSR and PSD conditions contained in underlying ATC permits		√		
Periodic Monitoring Decisions	Periodic monitoring decisions, where the decisions deviate from already agreed upon levels (eg. Monitoring decisions agreed upon by the district and EPA either through: the Title V periodic monitoring workgroup; or another Title V permit for a similar source). These decisions could be part of the permit package or reside in a publicly available document.	The rationale for the monitoring method selected	A description of the monitoring and operational restrictions requirements	1) recordkeeping and period monitoring that is required under 40 CFR 70.6(a)(3)(i)(B) or district regulation 2) Ensure that the rationale for the selected monitoring method or lack of monitoring is clearly explained and documented in the permit record.	The SOB must include a basis for its periodic monitoring decisions (adequacy of chosen monitoring or justification for not requiring periodic monitoring)	The SOB must include a basis for its periodic monitoring decisions. Any emissions factors, exhaust characteristics, or other assumptions or inputs used to justify no periodic monitoring is required, should be included in SOB		√
Facility Description		A description of the facility	√			√		
Applicability Determinations and Exemptions		Any federal regulatory applicability determinations	Applicability and exemptions	1) Applicability determinations for source specific applicable requirements 2) Origin or factual basis for each permit condition or exemption	SOB must discuss the Applicability of various NSPS, NESHAP and local SIP requirements and include the basis for all exemptions	SOB must discuss the Applicability of various NSPS, NESHAP and local SIP requirements and include the basis for all exemptions		√
General Requirements			Certain factual information as necessary	Generally the SOB should provide "a record of the applicability and technical issues surrounding the issuance of the permit."		√	√	√



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

February 19, 1999

Mr. David Dixon
Chairperson, Title V Subcommittee
San Luis Obispo County
Air Pollution Control District
3433 Roberto Court
San Luis Obispo, CA 93401

Dear Mr. Dixon:

I am writing to provide a final version of our response to your July 2, 1998 letter in which you expressed concern about Region IX's understanding of the Subcommittee's tentative resolution to the 45-day EPA review period issue. I have also included a summary of the Subcommittee's agreement on two title V implementation issues originally raised by some Subcommittee members at our meeting on August 18, 1998. Our response reflects many comments and suggestions we have received during the past several months from members of the Title V Subcommittee and EPA's Office of General Counsel. In particular, previous drafts of this letter and the enclosure have been discussed at Subcommittee meetings on October 1, 1998, November 5, 1998, January 14, 1999, and February 17, 1999. Today's final version incorporates suggested changes as discussed at these meetings and is separated into two parts: Part I is "guidance" on what constitutes a complete Title V permit submittal; and Part II is a five-point process on how to better coordinate information exchange during and after the 45-day EPA review period.

We will address the letter to David Howekamp from Peter Venturini dated August 7, 1998 regarding permits issued pursuant to NSR rules that will not be SIP approved in the near future. This issue was also discussed at the August 18 Title V Subcommittee meeting.

I appreciate your raising the issues regarding the 45-day EPA review clock to my attention. Your efforts, along with the efforts of other Title V Subcommittee members, have been invaluable towards resolving this and other Title V implementation issues addressed in this letter. The information in the enclosure will clarify Title V permitting expectations between Region IX and the California Districts and will improve coordination of Title V permit information. It is important to implement this immediately, where necessary, so the benefits of this important program can be fully realized as soon as possible in the state of California as well as other states across the country.

If you have any questions please do not hesitate to call me at (415) 744-1254.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matt', followed by a long horizontal flourish.

Matt Haber
Chief, Permits Office

Enclosure

cc: California Title V Contacts
California Air Pollution Control Officers
Ray Menebroker, CARB
Peter Venturini, CARB

Enclosure

Neither the guidance in Part I nor the process in Part II replace or alter any requirements contained in Title V of the Clean Air Act or 40 CFR Part 70.

PART I. Guidance on Information Necessary to Begin 45-day EPA Review

A complete submittal to EPA for a proposed permit consists of the application (if one has not already been sent to EPA), the proposed permit, and a statement of basis. If applicable to the Title V facility (and not already included in the application or proposed permit) the statement of basis should include the following:

- additions of permitted equipment which were not included in the application;
- identification of any applicable requirements for insignificant activities or State-registered portable equipment that have not previously been identified at the Title V facility,
- outdated SIP requirement streamlining demonstrations,
- multiple applicable requirements streamlining demonstrations,
- permit shields,
- alternative operating scenarios,
- compliance schedules,
- CAM requirements,
- plant wide allowable emission limits (PAL) or other voluntary limits,
- any district permits to operate or authority to construct permits;
- periodic monitoring decisions, where the decisions deviate from already agreed-upon levels (e.g., monitoring decisions agreed upon by the district and EPA either through: the Title V periodic monitoring workgroup; or another Title V permit for a similar source). These decisions could be part of the permit package or could reside in a publicly available document.

Part II - Title V Process

The following five-point process serves to clarify expectations for reviewing Title V permits and coordinating information on Title V permits between EPA Region IX ("EPA") and Air Pollution Districts in California ("District"). Districts electing to follow this process can expect the following. Districts may, at their discretion, make separate arrangements with Region IX to implement their specific Title V permit reviews differently.

Point 1: The 45-day clock will start one day after EPA receives all necessary information to adequately review the title V permit to allow for internal distribution of the documents. Districts may use return receipt mail, courier services, Lotus Notes, or any other means they wish to transmit a package and obtain third party assurance that EPA received it. If a District would like written notice from EPA of when EPA received the proposed title V permit, the District should notify EPA of this desire in writing. After receiving the request, Region IX will provide written response acknowledging receipt of permits as follows:

(Date)

Dear (APCO):

We have received your proposed Title V permit for (Source Name) on (Date). If, after 45-days from the date indicated above, you or anyone in your office has not heard from us regarding this permit, you may assume our 45-day review period is over.

Sincerely,

Matt Haber
Chief, Permits Office

Point 2: After EPA receives the proposed permit, the permit application, and all necessary supporting information, the 45-day clock may not be stopped or paused by either a District or EPA, except when EPA approves or objects to the issuance of a permit.

Point 3: The Districts recognize that EPA may need additional information to complete its title V permit review. If a specific question arises, the District involved will respond as best it can by providing additional background information, access to background records, or a copy of the specific document.

The EPA will act expeditiously to identify, request and review additional information and the districts will act expeditiously to provide additional information. If EPA determines there is a

basis for objection, including the absence of information necessary to review adequately the proposed permit, EPA may object to the issuance of the permit. If EPA determines that it needs more information to reach a decision, it may allow the permit to issue and reopen the permit after the information has been received and reviewed.

Point 4: When EPA objects to a permit, the Subcommittee requested that the objection letter identify why we objected to a permit, the legal basis for the objection, and a proposal suggesting how to correct the permit to resolve the objection.

It has always been our intent to meet this request. In the future, when commenting on, or objecting to Title V permits, our letters will identify recommended improvements to correct the permit. For objection letters, EPA will identify why we objected to a permit, the legal basis for the objection, and details about how to correct the permit to resolve the objection. Part 70 states that "Any EPA objection...shall include a statement of the Administrator's reasons for objection and a description of the terms and conditions that the permit must include to respond to the objections."

Point 5: When EPA objects to a permit, and a District has provided information with the intent to correct the objection issues, the Subcommittee members requested a letter from EPA at the end of the 90-day period stating whether the information provided by the District has satisfied the objection.

While we agree with the Districts' desire for clear, written communication from EPA, a written response will not always be possible by the 90th day because the regulations allow a District 90 days to provide information. To allow EPA ample time to evaluate submitted information to determine whether the objection issues have been satisfied, we propose establishing a clear protocol. The following protocol was agreed to by members of the Subcommittee:

1. within 60 days of an EPA objection, the District should revise and submit a proposed permit in response to the objection;
2. within 30 days after receipt of revised permit, EPA should evaluate information and provide written response to the District stating whether the information provided by the District has satisfied the objection.

December 20, 2001

(AR-18J)

Robert F. Hodanbosi, Chief
Division of Air Pollution Control
Ohio Environmental Protection Agency
122 South Front Street
P. O. Box 1049
Columbus, Ohio 43266-1049

Dear Mr. Hodanbosi:

I am writing this letter to provide guidelines on the content of an adequate statement of basis (SB) as we committed to do in our November 21, 2001, letter. The regulatory basis for a SB is found in 40 C.F.R. § 70.7(a)(5) and Ohio Administrative Code (OAC) 3745-77-08(A)(2) which requires that each draft permit must be accompanied by "a statement that sets forth the legal and factual basis for the draft permit conditions." The May 10, 1991, preamble also suggests the importance of supplementary materials.

"[United States Environmental Protection Agency (USEPA)]...can object to the issuance of a permit where the materials submitted by the State permitting authority to EPA do not provide enough information to allow a meaningful EPA review of whether the proposed permit is in compliance with the requirements of the Act." (56 FR 21750)

The regulatory language is clear in that a SB must include a discussion of decision-making that went into the development of the Title V permit and to provide the permitting authority, the public, and the USEPA a record of the applicability and technical issues surrounding issuance of the permit. The SB is part of the historical permitting record for the permittee. A SB generally should include, but not be limited to, a description of the facility to be permitted, a discussion of any operational flexibility that will be utilized, the basis for applying a permit shield, any regulatory applicability determinations, and the rationale for the monitoring methods selected. A SB should specifically reference all supporting materials relied upon, including the applicable statutory or regulatory provision.

While not an exhaustive list of what should be in a SB, below are several important areas where the Ohio Environmental Protection Agency's (OEPA) SB could be improved to better meet the intent of Part 70.

Discussion of the Monitoring and Operational Requirements

OEPA's SB must contain a discussion on the monitoring and operational restriction provisions that are included for each emission unit. 40 C.F.R. §70.6(a) and OAC 3745-77-07(A) require that monitoring and operational requirements and limitations be included in the permit to assure compliance with all applicable requirements at the time of permit issuance. OEPA's selection of the specific monitoring, including parametric monitoring and recordkeeping, and operational requirements must be explained in the SB. For example, if the permitted compliance method for a grain-loading standard is maintaining the baghouse pressure drop within a specific range, the SB must contain sufficient information to support the conclusion that maintaining the pressure drop within the permitted range demonstrates compliance with the grain-loading standard.

The USEPA Administrator's decision in response to the Fort James Camas Mill Title V petition further supports this position. The decision is available on the web at

http://www.epa.gov/region07/programs/artd/air/title5/petitiondb/petitions/fort_james_decision1999.pdf. The Administrator stated that the rationale for the selected monitoring method must be clear and documented in the permit record.

Discussion of Applicability and Exemptions

The SB should include a discussion of any complex applicability determinations and address any non-applicability determinations. This discussion could include a reference to a determination letter that is relevant or pertains to the source. If no separate determination letter was issued, the SB should include a detailed analysis of the relevant statutory and regulatory provisions and why the requirement may or may not be applicable. At a minimum, the SB should provide sufficient information for the reader to understand OEPA's conclusion about the applicability of the source to a specific rule. Similarly, the SB should discuss the purpose of any limits on potential to emit that are created in the Title V permit and the basis for exemptions from requirements, such as exemptions from the opacity standard granted to emissions units under OAC rule 3745-17-07(A). If the permit shield is granted for such an exemption or non-applicability determination, the permit shield must also provide the determination or summary of the determination. See CAA Section 504(f)(2) and 70.6(f)(1)(ii).

Explanation of any conditions from previously issued permits that are not being transferred to the Title V permit

In the course of developing a Title V permit, OEPA may decide that an applicable requirement no longer applies to a facility or otherwise not federally enforceable and, therefore, not necessary in the Title V permit in accordance with USEPA's "White Paper for Streamlined Development of the Part 70 Permit Applications" (July 10, 1995). The SB should include the rationale for such a determination and reference any supporting materials relied upon in the determination.

I will also note that for situations that not addressed in the July 10, 1995, White Paper, applicable New Source Review requirements can not be dropped from the Title V permit without first revising the permit to install.

Discussion of Streamlining Requirements

The SB should include a discussion of streamlining determinations. When applicable requirements overlap or conflict, the permitting authority may choose to include in the permit the requirement that is determined to be most stringent or protective as detailed in USEPA's "White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program" (March 5, 1996). The SB should explain why OEPA concluded that compliance with the streamlined permit condition assures compliance with all the overlapping requirements.

Other factual information

The SB should also include factual information that is important for the public to be aware of. Examples include:

1. A listing of any Title V permits issued to the same applicant at the plant site, if any. In some cases it may be important to include the rationale for determining that sources are support facilities.
2. Attainment status.
3. Construction and permitting history of the source.
4. Compliance history including inspections, any violations noted, a listing of consent decrees into which the permittee has entered and corrective action(s) taken to address noncompliance.

I do understand the burden that the increased attention to the SB will cause especially during this time when OEPA has been working so hard to complete the first round of Title V permit issuance. I do hope that you will agree with me that including the information listed above in OEPA's SB will only improve the Title V process. If you would like examples of other permitting authorities' SB, please contact us. We would be happy to provide you with some. I would also mention here that this additional information should easily fit in the format OEPA currently uses for its SB. We look forward to continued cooperation between our offices on this issue. If you have any questions, please contact Genevieve Damico, of my staff, at (312) 353-4761.

Sincerely yours,

/s/

Stephen Rothblatt, Chief
Air Programs Branch

**BEFORE THE ADMINISTRATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

IN THE MATTER OF)	
LOS MEDANOS ENERGY)	PETITION NO.
CENTER)	ORDER RESPONDING TO
)	PETITIONERS REQUEST THAT THE
MAJOR FACILITY REVIEW)	ADMINISTRATOR OBJECT TO
PERMIT No. B1866,)	ISSUANCE OF A STATE OPERATING
Issued by the Bay Area Air)	PERMIT
Quality Management District)	
_____)	

**ORDER DENYING IN PART AND GRANTING IN PART PETITION FOR OBJECTION
TO PERMIT**

On September 6, 2001, the Bay Area Air Quality Management District, (“BAAQMD” or “District”) issued a Major Facility Review Permit to Los Medanos Energy Center, Pittsburg, California (“Los Medanos Permit” or “Permit”), pursuant to title V of the Clean Air Act (“CAA” or “the Act”), 42 U.S.C. §§ 7661-7661f, CAA §§ 501-507. On October 12, 2001, the Environmental Protection Agency (“EPA”) received a petition from Our Children’s Earth Foundation (“OCE”) and Californians for Renewable Energy, Inc., (“CARE”) (collectively, the “Petitioners”) requesting that the EPA Administrator object to the issuance of the Los Medanos Permit pursuant to Section 505(b)(2) of the Act, the federal implementing regulations found at 40 CFR Part 70.8, and the District’s Regulation 2-6-411.3 (“Petition”).

The Petitioners allege that the Los Medanos Permit (1) improperly includes an emergency breakdown exemption condition that incorporates a broader definition of “emergency” than allowed by 40 CFR § 70.6(g); (2) improperly includes a variance relief condition which is not federally enforceable; (3) fails to include a statement of basis as required by 40 CFR § 70.7(a)(5); (4) contains permit conditions that are inadequate under 40 CFR Part 70, namely that certain provisions are unenforceable; and (5) fails to incorporate certain changes OCE requested during the public comment period and agreed to by BAAQMD.

EPA has now fully reviewed the Petitioners’ allegations. In considering the allegations, EPA performed an independent and in-depth review of the Los Medanos Permit; the supporting documentation for the Los Medanos Permit; information provided by the Petitioners in the Petition and in a letter dated November 21, 2001; information gathered from the Petitioners in a November 8, 2001 meeting; and information gathered from the District in meetings held on October 31, 2001, December 5, 2001, and February 7, 2002. Based on this review, I grant in part and deny in part the Petitioners’ request that I “object to the issuance of the Title V Operating Permit for the Los Medanos Energy Center,” and hereby order the District to reopen the Permit

for the reasons described below.

I. STATUTORY AND REGULATORY FRAMEWORK

Section 502(d)(1) of the Act calls upon each State to develop and submit to EPA an operating permit program to meet the requirements of title V. In 1995, EPA granted interim approval to the title V operating permit program submitted by BAAQMD. 60 Fed. Reg. 32606 (June 23, 1995); 40 CFR Part 70, Appendix A. Effective November 30, 2001, EPA granted full approval to BAAQMD's title V operating permit program. 66 Fed. Reg. 63503 (December 7, 2001).

Major stationary sources of air pollution and other sources covered by title V are required to apply for an operating permit that includes applicable emission limitations and such other conditions as are necessary to assure compliance with applicable requirements of the Act. See CAA §§ 502(a) and 504(a). The title V operating permit program does not generally impose new substantive air quality control requirements (which are referred to as "applicable requirements"), but does require permits to contain monitoring, recordkeeping, reporting, and other conditions to assure compliance by sources with existing applicable requirements. 57 Fed. Reg. 32250, 32251 (July 21, 1992). One purpose of the title V program is to enable the source, EPA, permitting authorities, and the public to better understand the applicable requirements to which the source is subject and whether the source is meeting those requirements. Thus, the title V operating permits program is a vehicle for ensuring that existing air quality control requirements are appropriately applied to facility emission units and that compliance with these requirements is assured.

Under § 505(a) of the Act and 40 CFR § 70.8(a), permitting authorities are required to submit all operating permits proposed pursuant to title V to EPA for review. If EPA determines that a permit is not in compliance with applicable requirements or the requirements of 40 CFR Part 70, EPA will object to the permit. If EPA does not object to a permit on its own initiative, section 505(b)(2) of the Act and 40 CFR § 70.8(d) provide that any person may petition the Administrator, within 60 days of the expiration of EPA's 45-day review period, to object to the permit. To justify the exercise of an objection by EPA to a title V permit pursuant to section 505(b)(2), a petitioner must demonstrate that the permit is not in compliance with the requirements of the Act, including the requirements of Part 70. Part 70 requires that a petition must be "based only on objections to the permit that were raised with reasonable specificity during the public comment period. . . , unless the petitioner demonstrates that it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period." 40 CFR § 70.8(d). A petition for administrative review does not stay the effectiveness of the permit or its requirements if the permit was issued after the expiration of EPA's 45-day review period and before receipt of the objection. If EPA objects to a permit in response to a petition and the permit has been issued, the permitting authority or EPA will modify, terminate, or revoke and reissue such a permit using the procedures in 40 CFR §§ 70.7(g)(4) or (5)(i) and (ii) for reopening a permit for cause.

II. BACKGROUND

The Los Medanos Energy Center facility (“Facility”), formerly owned by Enron Corporation under the name Pittsburg District Energy Facility, is a natural gas-fired power plant presently owned and operated by Calpine Corporation. The plant, with a nominal electrical capacity of 555-megawatts (“MW”), is located in Pittsburg, California. The Facility received its final determination of compliance (“FDOC”)¹ from the District in June, 1999, and its license to construct and operate from the California Energy Commission (“CEC”)² on August 17, 1999. The Facility operates two large natural gas combustion turbines with associated heat recovery steam generators (“HRSG”), and one auxiliary boiler. The Facility obtained a revised authority to construct (“ATC”)³ permit from the District in March, 2001 to increase heat input ratings of the two HRSGs and the auxiliary boiler,⁴ and to add a fire pump diesel engine and a natural gas-fired emergency generator. The Facility began commercial operation in July, 2001. The Facility emits nitrogen oxide (“NO_x”), carbon monoxide (“CO”), and particulate matter (“PM”), all of which are regulated under the District’s federally approved or delegated nonattainment new source review (“NSR”) and prevention of significant deterioration (“PSD”) programs⁵ or other District Clean Air Act programs.

On June 28, 2001, the District completed its evaluation of the title V application for the Facility and issued the draft title V Permit. Under the District’s rules, this action started a simultaneous 30-day public comment period and a 45-day EPA review period. On August 1, 2001, Mr. Kenneth Kloc of the Environmental Law and Justice Clinic submitted comments to the

¹An FDOC describes how a proposed facility will comply with applicable federal, state, and BAAQMD regulations, including control technology and emission offset requirements of New Source Review. Permit conditions necessary to insure compliance with applicable regulations are also included.

²The FDOC served as an evaluation report for both the CEC’s certificate and the District’s authority to construct (“ATC”) permit. The initial ATC was issued by the District shortly after the FDOC under District application #18595.

³ATC permits are federally enforceable pre-construction permits that reflect the requirements of the attainment area prevention of significant deterioration and nonattainment area new source review (“NSR”) programs. The District’s NSR requirements are described in Regulation 2, Rule 2. New power plants locating in California subject to the CEC certification requirements must also comply with Regulation 2, Rule 3, titled Power Plants. Regulation 2-3-405 requires the District to issue an ATC for a subject facility only after the CEC issues its certificate for the facility.

⁴The increased heat input allowed the facility to increase its electrical generating capacity from 520 MW to 555 MW.

⁵The District was implementing the federal PSD program under a delegation agreement with EPA dated October 28, 1997. The non-attainment NSR program was most recently SIP-approved by EPA on January 26, 1999. 64 Fed. Reg. 3850.

District on the draft Los Medanos Permit on behalf of OCE (“OCE’s Comment Letter”).⁶ The District responded to OCE’s Comment Letter by a letter dated September 4, 2001, from William de Boisblanc (“Response to Comments”). EPA Region IX did not object to the proposed permit during its 45-day review period. The Petition to Object to the Permit, filed by OCE and CARE and dated October 9, 2001, was received by Region IX on October 12, 2001. EPA calculates the period for the public to petition the Administrator to object to a permit as if the 30-day public comment and 45-day EPA review periods run sequentially, accordingly petitioners have 135 days after the issuance of a draft permit to submit a petition.⁷ Given that the Petition was filed with EPA on October 12, 2001, I find that it was timely filed. I also find that the Petition is appropriately based on objections that were raised with reasonable specificity during the comment period or that arose after the public comment period expired.⁸

III. ISSUES RAISED BY THE PETITIONERS

A. District Breakdown Relief Under Permit Condition I.H.1

Petitioners’ first allegation challenges the inclusion in the Los Medanos Permit of Condition I.H.1, a provision which incorporates SIP rules allowing a permitted facility to seek relief from enforcement by the District in the event of a breakdown. Petition at 3. Petitioners assert that the definition of “breakdown” at Regulation 1-208 would allow relief in situations beyond those allowed under the Clean Air Act. Specifically, Petitioners allege that the “definition of ‘breakdown’ in Regulation 1-208 is much broader than the federal definition of breakdown, which is provided in 40 CFR Part 70,” or more precisely, at 40 CFR § 70.6(g).

Condition I.H.1 incorporates District Regulations 1-208, 1-431, 1-432, and 1-433 (collectively the “Breakdown Relief Regulations”) into the Permit. Regulation 1-208 defines breakdown, and Regulations 1-431 through 1-433 describe how an applicant is to notify the District of a breakdown, how the District is to determine whether the circumstances meet the definition of a breakdown, and what sort of relief to grant the permittee. To start our analysis, it

⁶We note that OCE submitted its comments to the District days after the close of the public comment period established pursuant to the District’s Regulation 2-6-412 and 40 CFR § 70.7(h)(4). Though we are responding to the Petition despite this possible procedural flaw, we reserve our right to raise this issue in any future proceeding.

⁷This 135-day period to petition the Administrator is based on a 30-day District public notice and comment period, a 45-day EPA review period and the 60-day period for a person to file a petition to object with EPA.

⁸In its Comment Letter, OCE generally raised concerns with the draft Major Facility Review Permit that are the basis for the Petition. In regard to whether all issues were raised with ‘reasonable specificity,’ I find that claims one through four of the Petition were raised adequately in OCE’s Comment Letter. The fifth claim, that the District did not live up to its commitment to make changes to the Permit, can be raised in the Petition since the grounds for the claim arose after the public comment period ended. See 40 CFR § 70.8(d). Finally, CARE’s non-participation in the District’s notice-and-comment process does not prevent the organization from filing a title V petition because the regulations allow “any person” to file a petition based on earlier objections raised during the public comment period regardless of who had filed those earlier comments. See CAA § 505(b)(2); 40 CFR § 70.8(d)

is important to understand the impact of granting relief under the Breakdown Relief Regulations. Neither Condition I.H.1, nor the SIP provisions it incorporates into the Permit, would allow for an exemption from an applicable requirement for periods of excess emissions. An “exemption from an applicable requirement” would mean that the permittee would be deemed not to be in violation of the requirement during the period of excess emissions. Rather, these Breakdown Relief Regulations allow an applicant to enter into a proceeding in front of the District that could ultimately lead to the District employing its enforcement discretion not to seek penalties for violations of an applicable requirement that occurred during breakdown periods.

Significantly, the Breakdown Relief Regulations have been approved by EPA as part of the District’s federally enforceable SIP. 64 Fed. Reg. 34558 (June 28, 1999) (this is the most recent approval of the District’s Regulation 1). Part 70 requires all SIP provisions that apply to a source to be included in title V permits as “applicable requirements.” See In re Pacificorp’s Jim Bridger and Naughton Electric Utility Steam Generating Plants, Petition No. VIII-00-1, at 23-24 (“Pacificorp”). On this basis alone, the inclusion of the Breakdown Relief Regulations in the permit is not objectionable.⁹

Moreover, Petitioners’ allegation that Condition 1.H.1 is inconsistent with 40 CFR § 70.6(g) does not provide a basis for an objection. 40 CFR § 70.6(g) allows a permitting authority to incorporate into its title V permit program an affirmative defense provision for “emergency” situations as long as the provision is consistent with the 40 CFR § 70.6(g)(3) elements. Such an emergency defense then may be incorporated into permits issued pursuant to that program. As explained above, these regulations provide relief based on the District’s enforcement discretion and do not provide an affirmative defense to enforcement. Moreover, to the extent the emergency defense is incorporated into a permit, 40 CFR § 70.6(g)(5) makes clear that the Part 70 affirmative defense type of relief for emergency situations “is in addition to any emergency or upset provision contained in any applicable requirement.” This language clarifies that the Part 70 regulations do not bar the inclusion of applicable SIP requirements in title V permits, even if those applicable requirements contain “emergency” or “upset” provisions such as Condition 1.H.1 that may overlap with the emergency defense provision authorized by 40 CFR § 70.6(g).

Also, a review of the Breakdown Relief Regulations themselves demonstrates that they are not inconsistent with the Clean Air Act, and therefore, not contrary to the Act. A September 28, 1982, EPA policy memorandum from Kathleen Bennet, titled Policy on Excess Emissions During Startup, Shutdown, Maintenance, and Malfunctions (“1982 Excess Emission Policy”), explains that “all periods of excess emissions [are] violations of the applicable standard.” Accordingly, the 1982 Excess Emission Policy provides that EPA will not approve automatic exemptions in operating permits or SIPs. However, the 1982 Excess Emission Policy also

⁹This holds true even if the Petitioner could support an allegation that EPA had erroneously incorporated the provisions into the SIP. See Pacificorp at 23 (“even if the provision were found not to satisfy the Act, EPA could not properly object to a permit term that is derived from a provision of the federally approved SIP”). However, as explained below, EPA believes that these provisions were appropriately approved as part of the District’s SIP.

explains that EPA can approve, as part of a SIP, provisions that codify an “enforcement discretion approach.” The Agency further refined its position on this topic in a September 20, 1999 policy memorandum from Steven A. Herman and Robert Perciasepe, titled State Implementation Plans: Policy Regarding Excess Emissions During Malfunctions, Startup, and Shutdown (“1999 Excess Emission Policy”).¹⁰ The 1999 Excess Emission Policy explained that a permitting authority may express its enforcement discretion through appropriate affirmative defense provisions approved into the SIP as long as the affirmative defense applies only to civil penalties (and not injunctive relief) and meets certain criteria. As previously explained, the Breakdown Relief Regulations approved into the District’s SIP provide neither an affirmative defense to an enforcement action nor an automatic exemption from applicable requirements, but rather serve as a mechanism for the District to use its enforcement discretion. Therefore, I find that the provision is not inconsistent with the Act.

Finally, Petitioners allege that the inclusion of Condition I.H.1 “creates unnecessary confusion and unwarranted potential defense to federal civil enforcement.” Inclusion of Condition I.H.3 in the Los Medanos Permit clarifies Condition I.H.1 by stating that “[t]he granting by the District of breakdown relief . . . will not provide relief from federal enforcement.” Contrary to Petitioners’ allegation, we find that addition of this language successfully dispels any ambiguity as to the impact of the provision, especially as it relates to federal enforceability, and therefore clears up “confusion” and limits “unwarranted defenses.” For the reasons stated above, I deny the Petition as it relates to Condition I.H.1 and the incorporation of the Breakdown Relief Regulations into the Permit.

B. Hearing Board Variance Relief Under Permit Condition I.H.2

The Petitioners’ second allegation challenges the inclusion in the Los Medanos Permit of Condition I.H.2, which states that a “permit holder may seek relief from enforcement action for a violation of any of the terms and conditions of this permit by applying to the District’s Hearing Board for a variance pursuant to Health and Safety Code Section 42350. . . .” Petition at 3. Petitioners make a number of arguments in support of their claim that the reference to California’s Variance Law in the Los Medanos Permit serves as a basis for an objection; none of these allegations, however, serves as an adequate basis for EPA to object to the Permit.

Health and Safety Code (“HSC”) sections 42350 et seq. (“California’s Variance Law”) allow a permittee to request an air district hearing board to issue a variance to allow the permittee to operate in violation of an applicable district rule, or State rule or regulation for a limited time. Section 42352(a) prohibits the issuance of a variance unless the hearing board makes specific

¹⁰ On December 5, 2001, EPA issued a brief clarification of this policy. Re-Issuance of Clarification – State Implementation Plans (SIPs); Policy Regarding Excess Emissions During Malfunction, Startup, and Shutdown.

findings.¹¹ Section 42352(a)(2) limits the availability of variances to situations involving non-compliance with “any rule, regulation, or order of the district.” As part of the variance process, the hearing board may set a “schedule of increments of progress,” to establish milestones and final deadlines for achieving compliance. See, e.g., HSC § 42358. EPA has not approved California’s Variance Law into the SIP or Title V program of any air district. See, e.g., 59 Fed. Reg. 60939 (Nov. 29, 1994) (proposing to approve BAAQMD’s title V program without California’s Variance Law); 60 Fed. Reg. 32606 (June 23, 1995) (granting final interim approval to BAAQMD’s title V program).

Petitioners argue that the “variance relief issued by BAAQMD under state law does not qualify as emergency breakdown relief authorized by the Title V provisions . . .” Petition at 4. As with the Breakdown Relief Regulations, Petitioners’ true concern appears to be that Condition I.H.2 and California’s Variance Law are inconsistent with 40 CFR § 70.6(g), which allows for the incorporation of an affirmative defense provision into a federally approved title V program, and thus into title V permits. Condition I.H.2 and California’s Variance Law, however, do not need to be consistent with 40 CFR § 70.6(g) because these provisions merely express an aspect of the District’s discretionary enforcement authority under State law rather than incorporate a Part 70 affirmative defense provision into the Permit.¹² As described above, the discretionary

¹¹ HSC section 42352(a) provides as follows:

No variance shall be granted unless the hearing board makes all of the following findings:

- (1) That the petitioner for a variance is, or will be, in violation of Section 41701 or of any rule, regulation, or order of the district.
- (2) That, due to conditions beyond the reasonable control of the petitioner, requiring compliance would result in either (A) an arbitrary or unreasonable taking of property, or (B) the practical closing and elimination of a lawful business. In making those findings where the petitioner is a public agency, the hearing board shall consider whether or not requiring immediate compliance would impose an unreasonable burden upon an essential public service. For purposes of this paragraph, “essential public service” means a prison, detention facility, police or firefighting facility, school, health care facility, landfill gas control or processing facility, sewage treatment works, or water delivery operation, if owned and operated by a public agency.
- (3) That the closing or taking would be without a corresponding benefit in reducing air contaminants.
- (4) That the applicant for the variance has given consideration to curtailing operations of the source in lieu of obtaining a variance.
- (5) During the period the variance is in effect, that the applicant will reduce excess emissions to the maximum extent feasible.
- (6) During the period the variance is in effect, that the applicant will monitor or otherwise quantify emission levels from the source, if requested to do so by the district, and report these emission levels to the district pursuant to a schedule established by the district.

¹² Government agencies have discretion to not seek penalties or injunctive relief against a noncomplying source. California’s Variance Law recognizes this inherent discretion by codifying the process by which a source may seek relief through the issuance of a variance. The ultimate decision to grant a variance, however, is still wholly discretionary, as evidenced by the findings the hearing board must make in order to issue a variance. See HSC section 42352(a)(1)-(6).

nature of California's Variance Law is evidenced by the findings set forth in HSC §42538(a) that a hearing board must make before it can issue a variance.¹³ Inherent within the process of making these findings is the hearing board's ability to exercise its discretion to evaluate and consider the evidence and circumstances underlying the variance application and to reject or grant, as appropriate, that application. Moreover, the District clearly states in Condition I.H.3. that the granting by the District of a variance does not "provide relief from federal enforcement," which includes enforcement by both EPA and citizens.¹⁴ As Condition I.H.2. refers to a discretionary authority under state law that does not affect the federal enforceability of any applicable requirement, I do not find its inclusion in the Los Medanos Permit objectionable.

Petitioners also argue that the "variance program is a creature of state law," and therefore should not be included in the Los Medanos Permit. Petitioners' complaint is obviously without merit since Part 70 clearly allows for inclusion of state- and local-only requirements in title V permits as long as they are adequately identified as having only state- or local-only significance. 40 CFR § 70.6(b)(2). For this reason, I find that Petitioners' allegation does not provide a basis to object to the Los Medanos Permit.

Petitioners further argue that California's Variance Law allows a revision to the approved SIP in violation of the Act. Petitioners misunderstand the provision. The SIP is comprised of the State or district rules and regulations approved by EPA as meeting CAA requirements. SIP requirements cannot be modified by an action of the State or District granting a temporary variance. EPA has long held the view that a variance does not change the underlying SIP requirements unless and until it is submitted to and approved by EPA for incorporation into the SIP. For example, since 1976, EPA's regulations have specifically stated: "In order for a variance to be considered for approval as a revision to the State implementation plan, the State must submit it in accordance with the requirements of this section." 40 CFR §51.104(d); 41 Fed. Reg. 18510, 18511 (May 5, 1976).

The fact that the California Variance Law does not allow a revision to the approved SIP is further evidenced by the law itself. By its very terms, California's Variance Law is limited in application to "any rule, regulation, or order of the district," HSC § 42352(a)(2) (emphasis supplied); therefore, the law clearly does not purport to modify the federally approved SIP. In addition, California's view of the law's effect is consistent with EPA's. For instance, guidance

¹³ Because of its discretionary nature, California's Variance Law does not impose a legal impediment to the District's ability to enforce its SIP or title V program. EPA cannot prohibit the District's use of the variance process as a means for sources to avoid enforcement of permit conditions by the District unless the misuse of the variance process results in the District's failure to adequately implement or enforce its title V program, or its other federally delegated or approved CAA programs. Petitioners have made no such allegation.

¹⁴ Other BAAQMD information resources on variances also clearly set forth the legal significance of variances. For example, the application for a variance on BAAQMD's website states that EPA "does not recognize California's variance process" and that "EPA can independently pursue legal action based on federal law against the facility continuing to be in violation."

issued in 1989 by the California Air Resources Board (“CARB”), the State agency responsible for preparation of California’s SIP, titled Variances and Other Hearing Board Orders as SIP Revisions or Delayed Compliance Orders Under Federal Law, demonstrates that the State’s position with respect to the federal enforceability and legal consequences of variances is consistent with EPA’s. For example, the guidance states:

State law authorizes hearing boards of air pollution control districts to issue variances from district rules in appropriate instances. These variances insulate sources from the imposed state law. However, where the rule in question is part of the State Implementation Plan (SIP) as approved by the U.S. Environmental Protection Agency (EPA), the variance does not by itself insulate the source from penalties in actions brought by EPA to enforce the rule as part of the SIP. While EPA can use enforcement discretion to informally insulate sources from federal action, formal relief can only come through EPA approval of the local variance.

In 1993, the California Attorney General affirmed this position in a formal legal opinion submitted to EPA as part of the title V program approval process, stating that “any variance obtained by the source does not effect [sic] or modify permit terms or conditions . . . nor does it preclude federal enforcement of permanent terms and conditions.” In sum, both the federal and State governments have long held the view that the issuance of a variance by a district hearing board does not modify the SIP in any way. For this reason, I find that Petitioners’ allegation does not provide a basis to object to the Los Medanos Permit.

Finally, Petitioners raise concerns that the issuance of variances could “jeopardize attainment and maintenance of ambient air quality standards” and that inclusion of the variance provision in the Permit is highly confusing to the regulated community and public. As to the first concern, Petitioners’ allegation is too speculative to provide a basis for an objection to a title V permit. Moreover, as previously stated, permittees that receive a variance remain subject to all SIP and federal requirements, as well as federal enforcement for violation of those requirements. As to Petitioners’ final point, I find that including California’s Variance Law in title V permits may actually help clarify the regulatory scheme to the regulated community and the public. California’s Variance Law can be utilized by permittees seeking relief from District or State rules regardless of whether the Variance Law is referenced in title V permits; therefore, reference to the Variance Law with appropriate explanatory language as to its limited impact on federal enforceability helps clarify the actual nature of the law to the regulated community. In short, since title V permits are meant to contain all applicable federal, State, and local requirements, with appropriate clarifying language explaining the function and applicability of each requirement, the District may incorporate California’s Variance Law into the Los Medanos Permit and other title V permits. For reasons stated in this Section, I do not find grounds to object to the Los Medanos Permit on this issue.

C. Statement of Basis

Petitioners' third claim is that the Los Medanos Permit lacks a statement of basis, as required by 40 CFR § 70.7(a)(5). Petition at 5. Petitioners assert that without a statement of basis it is virtually impossible for the public to evaluate the periodic monitoring requirements (or lack thereof). Id. They specifically identify the District's failure to include an explanation for its decision not to require certain monitoring, including the lack of any monitoring for opacity, filterable particulate, or PM limits. Petition at 6-7, n.2. Additionally, Petitioners contend that BAAQMD fails to include any SO₂ monitoring for source S-2 (Heat Recovery Steam Generator). Id.

Section 70.7(a)(5) of EPA's permit regulations states that "the permitting authority shall provide a statement that sets forth the legal and factual basis for the draft permit conditions (including references to the applicable statutory or regulatory provisions)." The statement of basis is not part of the permit itself. It is a separate document which is to be sent to EPA and to interested persons upon request.¹⁵ Id.

A statement of basis ought to contain a brief description of the origin or basis for each permit condition or exemption. However, it is more than just a short form of the permit. It should highlight elements that EPA and the public would find important to review. Rather than restating the permit, it should list anything that deviates from a straight recitation of requirements. The statement of basis should highlight items such as the permit shield, streamlined conditions, or any monitoring that is required under 40 C.F.R. 70.6(a)(3)(i)(B) or District Regulation 2-6-503. Thus, it should include a discussion of the decision-making that went into the development of the title V permit and provide the permitting authority, the public, and EPA a record of the applicability and technical issues surrounding the issuance of the permit.¹⁶ See e.g., In Re Port

¹⁵Unlike permits, statements of basis are not enforceable, do not set limits and do not create obligations.

¹⁶EPA has provided guidance on the content of an adequate statement of basis in a letter dated December 20, 2001, from Region V to the State of Ohio and in a Notice of Deficiency ("NOD") issued to the State of Texas. <<http://www.epa.gov/rgytgrnj/programs/artd/air/title5/t5memos/sbguide.pdf>> (Region V letter to Ohio); 67 Fed. Reg. 732 (January 7, 2002) (EPA NOD issued to Texas). These documents describe the following five key elements of a statement of basis: (1) a description of the facility; (2) a discussion of any operational flexibility that will be utilized at the facility; (3) the basis for applying the permit shield; (4) any federal regulatory applicability determinations; and (5) the rationale for the monitoring methods selected. Id. at 735. In addition, the Region V letter further recommends the inclusion of the following topical discussions in a statement of basis: (1) monitoring and operational restrictions requirements; (2) applicability and exemptions; (3) explanation of any conditions from previously issued permits that are not being transferred to the title V permit; (4) streamlining requirements; and (5) certain other factual information as necessary. In a letter dated February 19, 1999 to Mr. David Dixon, Chair of the CAPCOA Title V Subcommittee, the EPA Region IX Air Division provided guidance to California permitting authorities that should be considered when developing a statement of basis for purposes of EPA Region IX's review. This guidance is consistent with the other guidance cited above. Each of the various guidance documents, including the Texas NOD and the Region V and IX letters, provide generalized recommendations for developing an adequate statement of basis rather than "hard and fast" rules on what to include in any given statement of basis. Taken as a whole, these recommendations provide a good roadmap as to what should be included in a statement of basis considering, for example, the technical complexity of the permit, the history of the facility, and any new provisions, such as periodic monitoring conditions, that the permitting authority has drafted in conjunction with issuing the title

Hudson Operation Georgia Pacific, Petition No. 6-03-01, at pages 37-40 (May 9, 2003) (“Georgia Pacific”); In Re Doe Run Company Buick Mill and Mine, Petition No. VII-1999-001, at pages 24-25 (July 31, 2002) (“Doe Run”). Finally, in responding to a petition filed in regard to the Fort James Camas Mill title V permit, EPA interpreted 40 CFR § 70.7(a)(5) to require that the rationale for selected monitoring method be documented in the permit record. See In Re Fort James Camas Mill, Petition No. X-1999-1, at page 8 (December 22, 2000) (“Ft. James”).

EPA’s regulations state that the permitting authority must provide EPA with a statement of basis. 40 CFR § 70.7(a)(5). The failure of a permitting authority to meet this procedural requirement, however, does not necessarily demonstrate that the title V permit is substantively flawed. In reviewing a petition to object to a title V permit because of an alleged failure of the permitting authority to meet all procedural requirements in issuing the permit, EPA considers whether the petitioner has demonstrated that the permitting authority’s failure resulted in, or may have resulted in, a deficiency in the content of the permit. See CAA § 505(b)(2) (objection required “if the petitioner demonstrates . . . that the permit is not in compliance with the requirements of this Act, including the requirements of the applicable [SIP]”); see also, 40 CFR § 70.8(c)(1). Thus, where the record as a whole supports the terms and conditions of the permit, flaws in the statement of basis generally will not result in an objection. See e.g., Doe Run at 24-25. In contrast, where flaws in the statement of basis resulted in, or may have resulted in, deficiencies in the title V permit, EPA will object to the issuance of the permit. See e.g., Ft. James at 8; Georgia Pacific at 37-40.

In this case, as discussed below, the permitting authority’s failure to adequately explain its permitting decisions either in the statement of basis or elsewhere in the permit record is such a serious flaw that the adequacy of the permit itself is in question. By reopening the permit, the permitting authority is ensuring compliance with the fundamental title V procedural requirements of adequate public notice and comment required by sections 502(b)(6) and 503(e) of the Clean Air Act and 40 CFR § 70.7(h), as well as ensuring that the rationale for the selected monitoring method, or lack of monitoring, is clearly explained and documented in the permit record. See 40 CFR §§ 70.7(a)(5) and 70.8(c); Ft. James at 8.

For the proposed Los Medanos Permit, the District did not provide EPA with a separate statement of basis document. In a meeting with EPA representatives held on October 31, 2001, at the Region 9 offices, the District claimed that it complied with the statement of basis requirements for the Los Medanos Permit because it incorporated all of the necessary explanatory information either directly into the Permit or it included such information in other supporting documentation.¹⁷ As such, the District argues, at a minimum, it complied with the substantive requirements of a statement of basis.

V permit.

¹⁷ This meeting along with the others held with the District were for fact-gathering purposes only. In a November 8, 2001 meeting at the Region 9 offices, the Petitioners were likewise provided the opportunity to present facts pertaining to the Petition to EPA representatives.

In responding to the Petition, we reviewed the final Los Medanos Permit and all supporting documentation, which included the proposed Permit, the FDOC drafted by the District for purposes of licensing the power plant with the CEC, and the “Permit Evaluation and Emission Calculations” (“Permit Evaluation”) which was developed in March 2001 as part of the modification to the previously issued ATC permit. Although the District provided some explanation in this supporting documentation as to the factual and legal basis for certain terms and conditions of the Permit, this documentation did not sufficiently set forth the basis or rationale for many other terms and conditions. Generally speaking, the District’s record for the Permit does not adequately support: (1) the factual basis for certain standard title V conditions; (2) applicability determinations for source-specific applicable requirements, such as the Acid Rain requirements and New Source Performance Standards (“NSPS”); (3) exclusion of certain NSR and PSD conditions contained in underlying ATC permits; (4) recordkeeping decisions and periodic monitoring decisions under 70.6(a)(3)(i)(B) and District Regulation 2-6-503; and (5) streamlining analyses, including a discussion of permit shields.

EPA Region 9 identified numerous specific deficiencies falling under each of these broad categories.¹⁸ For example, the District’s permit record does not adequately support the basis for certain source-specific applicable requirements identified in Section IV of the Permit, especially those regarding the applicability or non-applicability of subsections rules that apply to particular types of units such as NSPS for combustion turbines or SIP-approved District Regulations. For instance, in table IV-B and D of the Permit, the District indicates that subsection 303 of District Regulation 9-3, which sets forth NOx emission limitations, applies to certain emission units. However, the permit record fails to describe why subsection 601 of the same District Regulation, an otherwise seemingly applicable provision, is not included in the tables as an applicable requirement. Subsection 601 establishes how exhaust gases should be sampled and analyzed to determine NOx concentrations for purposes of compliance with subsection 303. Similarly, in the same tables, the District lists certain applicable NSPS subsections, such as those in 40 CFR Part 60 Subparts Da and GG, but does not explain why these subsections apply to those specific emission units nor why other seemingly applicable subsections of the same NSPS regulations do not apply to those units.¹⁹

The permit record also fails to explain the District’s streamlining decisions of certain

¹⁸ EPA Region 9 Permits Office described these areas of concern in greater detail in a memorandum dated March 29, 2002, “Region 9 Review of Statement of Basis for Los Medanos title V Permit in Response to Petition to Object.” This memorandum is part of the administrative record for this Order and was reviewed in responding to this Petition.

¹⁹ The tables in Section IV pertaining to certain gas turbines located at the Facility cite to 40 CFR 60.332(a)(1) as an applicable requirement. However, these same tables fail to cite to subsections 40 CFR 60.332(a)(2) through 60.332(l) of the same NSPS program even though these provisions also apply to gas turbines. The District’s failure to provide any sort of discussion or explanation as to the applicability or non-applicability of the subsections of 40 CFR 60.332 makes it impossible to review the District’s applicability determinations for this NSPS.

underlying ATC permit conditions as set forth in Section VI of the Permit. The District apparently modified or streamlined the ATC conditions in the context of the title V permitting process but failed to provide an explanation in the permit record as to the basis for the change to the conditions. For instance, Condition 53 of Section VI states that the condition was “[d]eleted [on] August, 2001,” but the District fails to discuss or explain anywhere in the permit record the basis for this deletion or the nature of the original condition that was deleted.

As a final example of the District’s failure to provide a basis or rationale for permit terms, in accordance with Petitioner’s claim, the permit record is devoid of discussion pertaining to how or why the selected monitoring is sufficient to assure compliance with the applicable requirements. See 69 Fed. Reg. 3202, 3207 (Jan. 22, 2004). Most importantly, for those applicable requirements which do not otherwise have monitoring requirements, the Permit fails to require monitoring pursuant to 40 C.F.R. 70.6(a)(3)(i)(B), and the permit record fails to discuss or explain why no monitoring should be required under this provision. As evidenced by these specific examples, I find the District did not provide an adequate analysis or discussion of the terms and conditions of the proposed Los Medanos Permit.

To conclude, by failing to draft a separate statement of basis document and by failing to include appropriate discussion in the Permit or other supporting documentation, the District has failed to provide an adequate explanation or rationale for many significant elements of the Permit. As such, I find that the Petitioners’ claim in regard to this issue is well founded, and by this Order, I am requiring the District to reopen the Los Medanos Permit, and make available to the public an adequate statement of basis that provides the public and EPA an opportunity to comment on the title V permit and its terms and conditions as to the issues identified above.

D. Inadequate Permit Conditions

Petitioners’ fourth claim is that Condition 22 in the Los Medanos Permit is unenforceable. The Petitioners claim that this condition “appears to defer the development of a number of permit conditions related to transient, non-steady state conditions to a time after approval of the Title V permit.” Petition at 7. The Petitioners recommend that “a reasonable set of conditions should be defined” and amended through the permit modification process to conform to new data in the future. I disagree with the Petitioners on this issue.

As Petitioners correctly note, Part 70 and the Act require that “conditions in a Title V permit. . . be enforceable.” However, they argue that “Condition 22 is presently unenforceable and must be deleted from the permit.” I find that the condition challenged by the Petitioners is enforceable.

Conditions 21 and 22 establish NO_x emissions levels for units P-1 and P-2, including limits for transient, non-steady state conditions. Condition 22(f) requires the permittee to gather data and draft and submit an operation and maintenance plan to control transient, non-steady

state emissions for units P-1 and P-2²⁰ within 15 months of issuance of the permit. Condition 22(g) creates a process for the District, after consideration of continuous monitoring and source test data, to fine-tune on a semi-annual basis the NO_x emission limit for units P-1 and P-2 during transient, non-steady state conditions and to modify data collection and recordkeeping requirements for the permittee.

These requirements are enforceable. EPA and the District can enforce both Condition 22(f)'s requirement to draft and submit an operation and maintenance plan for agency approval and the control measures adopted under the plan after approval. For Condition 22(g), the process for the District to modify emission limits and/or data collection and recordkeeping requirements is clearly set forth in the Permit and the modified terms will be federally enforceable. Moreover, the circumstances that trigger application of Condition 22 are specifically defined since Condition 22(c) precisely defines "transient, non-steady state condition" as when "one or more equipment design features is unable to support rapid changes in operation and respond to and adjust all operating parameters required to maintain the steady-state NO_x emission limit specified in Condition 21(b)." As such, I find that Condition 22 is federally and practically enforceable. Therefore, Petitioners' claim on this count is not supported by the plain language of the Permit itself.

Moreover, to the extent that Petitioners are concerned that Lowest Achievable Emission Rate ("LAER")²¹ emission standards are being set through a process that does not incorporate appropriate NSR, PSD, and title V public notice and comment processes, such concerns are not well-founded. By its very terms, the Permit prohibits relaxation of the LAER emissions standards set in the permitting process. Condition 21(b) of the Permit sets a LAER-level emission standard of 2.5 ppmv NO_x, averaged over any 1-hour period, for units P-1 and P-2 for all operational conditions other than transient, non-steady state conditions. Condition 22(a) sets the limit for transient, non-steady state conditions of 2.5 ppmv NO_x, averaged over any rolling 3-hour period.²² Implementation of Condition 22 cannot relax the LAER-level emission limits. Condition 22(f) merely requires further data-collecting, planning, and implementation of control

²⁰Unit P-1 is defined as "the combined exhaust point for the S-1 Gas Turbine and the S-2 HRSG after control by the A-1 SCR System and A-2 Oxidation Catalyst" and unit P-2 is defined as "the combined exhaust point for the S-3 Gas Turbine and the S-4 HRSG after control by the A-3 SCR System and A-4 Oxidation Catalyst." Permit, Condition 21 (a).

²¹LAER is the level of emission control required for all new and modified major sources subject to the NSR requirements of Section 173, Part D, of the CAA for non-attainment areas. 42 U.S.C. § 7501-15. Since the Bay Area is non-attainment for ozone, the Facility must meet LAER-level emission controls for NO_x emission since NO_x is a pre-cursor of ozone. California uses different terminology than the CAA when applying LAER, however. In California, best available control technology ("BACT") is consistent with LAER-level controls, and California and its local permitting authorities use this terminology when issuing permits.

²²The District determined this limit to be LAER for transient, non-steady state conditions because, as the District stated in its Response to Comments, "the NO_x emission limit (2.5 ppmv averaged over one hour) during load changes . . . ha[s] not yet been achieved in practice by any utility-scale power plant."

measures for transient, non-steady state emissions that go beyond those already established to comply with LAER requirements. While Condition 22(g) does allow the District to modify the emission limit during transient, non-steady state conditions,²³ this new limit cannot exceed the “backstop” LAER-level limit set by Condition 22(a). As such, Condition 22(g) serves to only make overall emission limits more stringent. The District itself recognized the “no backsliding” nature of Conditions 22(f) and (g) on page 3 of its Response to Comments where it stated that the Facility “must comply with ‘backstop’ NO_x emission limit of 2.5 ppmv, averaged over 3 hours, under all circumstances and comply with all hourly, daily and annual mass NO_x emission limits.”²⁴

Finally, for any control measures; further data collection, recordkeeping or monitoring requirements; new definitions; or emission limits established pursuant to Conditions 22(f) or (g) that are to be incorporated into the permit, the District must utilize the appropriate title V permit modification procedures set forth in 40 CFR § 70.7(d) and the District’s Regulation 2-6-415 to modify the Permit. The District itself recognizes this in Condition 22(g) by stating that “the Title V operating permit shall be amended as necessary to reflect the data collection and recordkeeping requirements established under 22(g)(ii).” For the reasons described above, we do not find Conditions 22(f) and (g) unenforceable or otherwise objectionable for inclusion in the Los Medanos Permit.

E. Failure to Incorporate Agreed-to Changes

The final claim by the Petitioners is that the District agreed to incorporate certain changes into the final Los Medanos Permit but failed to do so. Namely, Petitioners claim that the District failed to keep its commitments to OCE to add language requiring recordkeeping for stipulated abatement strategies under SIP-approved Regulation 4 and to add clarifying language about NO_x monitoring requirements. The District appeared to make these commitments in its Response to Comment Letter. These allegations do not provide a basis for objecting to the Permit because neither change is necessary to ensure that the District is properly including all applicable requirements in the permit nor are they necessary to assure compliance with the underlying applicable requirements. CAA § 504(a); 40 CFR § 70.6(a)(3).

The first change sought by OCE during the comment period was a requirement that the

²³The District may modify the emission limit during transient, non-steady state conditions every 6 months for the first 24 months after the start of the Commissioning period. The Commissioning period commences “when all mechanical, electrical, and control systems are installed and individual system start-up has been completed, or when a gas turbine is first fired, whichever comes first. . . .” The Commissioning period terminates “when the plant has completed performance testing, is available for commercial operation, and has initiated sales to the power exchange.” Permit, at page 34.

²⁴The purpose of Condition 22, as stated by the District, is to allow for limited “excursions above the emission limit that could potentially occur under unforeseen circumstances beyond [the Facility’s] control.” This is the rationale for the three hour averaging period for transient, non-steady state conditions rather than the one hour averaging period of Condition 21(b) for all other periods.

Facility document response actions taken during periods of heightened air pollution. The District's Regulation 4 establishes control and advisory procedures for large air emission sources when specified levels of ambient air contamination have been reached and prescribes certain abatement actions to be implemented by each air source when action alert levels of air pollution are reached. OCE recommended that the District require recordkeeping in the title V permit to "insure that the stipulated abatement strategies [of Regulation 4] are implemented during air pollution events," and the District appeared to agree to such a recommendation in its Response to Comments. Although the recordkeeping suggested by Petitioners would be helpful, Petitioners have not shown that it is required by title V, the SIP, or any federal regulation, and therefore, this failure to include it is not a basis for objecting to the permit.

The Part 70 regulations set the minimum standard for inclusion of monitoring and recordkeeping requirements in title V permits. See 40 CFR § 70.6(a)(3). These provisions require that each permit contain "periodic monitoring sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit" where the applicable requirement does not require periodic testing or instrumental or noninstrumental monitoring (which may consist of recordkeeping designed to serve as monitoring). 40 CFR § 70.6(a)(3)(i)(B). There may be limited cases in which the establishment of a regular program of monitoring and/or recordkeeping would not significantly enhance the ability of the permit to reasonably assure compliance with the applicable requirement and where the status quo (i.e., no monitoring or recordkeeping) could meet the requirements of 40 CFR § 70.6(a)(3). Such is the case here.

Air pollution alert events occur infrequently, and therefore, compliance with Regulation 4 is a minimal part of the source's overall compliance with SIP requirements. More importantly, Regulation 4-303 abatement requirements mostly impose a ban on direct burning or incineration during air pollution alert events, activities which are unlikely to occur at a gas-fired power plant such as the Facility and in any case are easy to monitor by District inspectors. The other Regulation 4-303 requirements are mostly voluntary actions to be taken by the sources, such as reduction in use of motor vehicles, and therefore do not require compliance monitoring or recordkeeping to assure compliance. Since the activities regulated by Regulation 4 are unlikely to occur at the Facility, and compliance is easily verified by District inspectors, recordkeeping is not necessary to assure compliance with Regulation 4. Therefore, further recordkeeping requirements sought by the Petitioners are not required by 40 CFR § 70.6(a)(3).

The second change sought by the Petitioners is to add language to Condition 36 clarifying why certain pollutants, such as NO_x emissions, are exempt from mass emission calculations. On page 3 of the District's Response to Comments, the District explained that the NO_x emissions are exempt from the mass emission calculations because they are measured directly through CEMS monitoring, whereas the other pollutant emissions subject to the calculations do not have equivalent CEMS monitoring. Though this clarification is helpful, it does not need to be incorporated into the title V permit itself. Therefore, its non-inclusion in the Permit does not provide a basis for an EPA objection to the Permit. To the extent that such

clarifying language is important, it should be included in the statement of basis, however. Since the District will be drafting a statement of basis for the Los Medanos Permit due to the partial granting of the Petition, we recommend that the clarifying language for Condition 36 be included in the newly drafted statement of basis.

Though we hope that permitting authorities would generally fulfill commitments made to the public, we find that the Petitioners' fifth claim does not provide a basis for an objection to the Los Medanos Permit for the reasons described above. The mere fact that the District committed to make certain changes, yet did not follow through on those commitments, does not provide a basis for an objection to a title V permit. Petitioners have provided no other reason why the agreed upon changes must be made to the permit beyond the District's commitments. I accordingly deny Petitioners' request to veto the permit on these grounds.

IV. CONCLUSION

For the reasons set forth above and pursuant to Section 505(b)(2) of the Clean Air Act, I am granting the Petitioners' request that the Administrator object to the issuance of the Los Medanos Permit with respect to the statement of basis issue and am denying the Petition with respect to the other allegations.

May 24, 2004
Date

_____/S/_____
Michael O. Leavitt
Administrator

BEFORE THE ADMINISTRATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

In the Matter of Valero Refining Co
Benicia, California Facility

Petition No. IX-2004-07

Major Facility Review Permit
Facility No. B2626
Issued by the Bay Area Air Quality
Management District

ORDER RESPONDING TO
PETITIONER'S REQUEST THAT THE
ADMINISTRATOR OBJECT TO
ISSUANCE OF A STATE OPERATING
PERMIT

ORDER DENYING IN PART AND GRANTING IN PART
A PETITION FOR OBJECTION TO PERMIT

On December 7, 2004, the Environmental Protection Agency ("EPA") received a petition ("Petition") from Our Children's Earth Foundation ("OCE" or "Petitioner") requesting that the EPA Administrator object to the issuance of a state operating permit from the Bay Area Air Quality Management District ("BAAQMD" or "District") to Valero Refining Co. to operate its petroleum refinery located in Benicia, California ("Permit"), pursuant to title V of the Clean Air Act ("CAA" or "the Act"), 42 U.S.C. §§ 7661-7661f, CAA §§ 501-507, EPA's implementing regulations in 40 C.F.R. Part 70 ("Part 70"), and the District's approved Part 70 program. *See* 66 Fed. Reg. 63503 (Dec. 7, 2001).

Petitioner requested EPA object to the Permit on several grounds. In particular, Petitioner alleged that the Permit failed to properly require compliance with applicable requirements pertaining to, *inter alia*, flares, cooling towers, process units, electrostatic precipitators, and other waste streams and units. Petitioner identified several alleged flaws in the Permit application and issuance, including a deficient Statement of Basis. Finally, Petitioners alleged that the permit impermissibly lacked a compliance schedule and failed to include monitoring for several applicable requirements.

EPA has now fully reviewed the Petitioner's allegations pursuant to the standard set forth in section 505(b)(2) of the Act, which places the burden on the petitioner to "demonstrate[] to the Administrator that the permit is not in compliance" with the applicable requirements of the Act or the requirements of part 70, *see also* 40 C.F.R. § 70.8(c)(1), and I hereby respond to them by this Order. In considering the allegations, EPA reviewed the Permit and related materials and information provided by the Petitioner in the Petition.¹ Based on this review, I partially deny and

¹On March 7, 2005 EPA received a lengthy (over 250 pages, including appendices), detailed submission from Valero Refining Company regarding this Petition. Due to the fact that Valero Refining Company made its submission very shortly before EPA's settlement agreement deadline for responding to the Petition and the size of the

partially grant the Petitioner's request that I object to issuance of the Permit for the reasons described below.

I. STATUTORY AND REGULATORY FRAMEWORK

Section 502(d)(1) of the Act calls upon each State to develop and submit to EPA an operating permit program to meet the requirements of title V. In 1995, EPA granted interim approval to the title V operating permit program submitted by BAAQMD. 60 Fed. Reg. 32606 (June 23, 1995); 40 C.F.R. Part 70, Appendix A. Effective November 30, 2001, EPA granted full approval to BAAQMD's title V operating permit program. 66 Fed. Reg. 63503 (Dec. 7, 2001.).

Major stationary sources of air pollution and other sources covered by title V are required to apply for an operating permit that includes applicable emission limitations and such other conditions as are necessary to assure compliance with applicable requirements of the Act. *See* CAA §§ 502(a) and 504(a). The title V operating permit program does not generally impose new substantive air quality control requirements (which are referred to as "applicable requirements"), but does require permits to contain monitoring, recordkeeping, reporting, and other compliance requirements when not adequately required by existing applicable requirements to assure compliance by sources with existing applicable emission control requirements. 57 Fed. Reg. 32250, 32251 (July 21, 1992). One purpose of the title V program is to enable the source, EPA, permitting authorities, and the public to better understand the applicable requirements to which the source is subject and whether the source is meeting those requirements. Thus, the title V operating permits program is a vehicle for ensuring that existing air quality control requirements are appropriately applied to facility emission units and that compliance with these requirements is assured.

Under section 505(a) of the Act and 40 C.F.R. § 70.8(a), permitting authorities are required to submit all operating permits proposed pursuant to title V to EPA for review. If EPA determines that a permit is not in compliance with applicable requirements or the requirements of 40 C.F.R. Part 70, EPA will object to the permit. If EPA does not object to a permit on its own initiative, section 505(b)(2) of the Act and 40 C.F.R. § 70.8(d) provide that any person may petition the Administrator, within 60 days of the expiration of EPA's 45-day review period, to object to the permit. Section 505(b)(2) of the Act requires the Administrator to issue a permit objection if a petitioner demonstrates that a permit is not in compliance with the requirements of the Act, including the requirements of Part 70 and the applicable implementation plan. *See*, 40 C.F.R. § 70.8(c)(1); *New York Public Interest Research Group, Inc. v. Whitman*, 321 F.3d 316, 333 n.11 (2d Cir. 2003). Part 70 requires that a petition must be "based only on objections to the

submission, EPA was not able to review the submission itself, nor was it able to provide the Petitioner an opportunity to respond to the submission. Although the Agency previously has considered submissions from permittees in some instances where EPA was able to fully review the submission and provide the petitioners with a chance to review and respond to the submissions, time did not allow for either condition here. Therefore, EPA did not consider Valero Refining Company's submission when responding to the Petition via this Order.

permit that were raised with reasonable specificity during the public comment period. . . , unless the petitioner demonstrates that it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period.” 40 C.F.R. § 70.8(d). A petition for objection does not stay the effectiveness of the permit or its requirements if the permit was issued after the expiration of EPA’s 45-day review period and before receipt of an objection. If EPA objects to a permit in response to a petition and the permit has been issued, the permitting authority or EPA will modify, terminate, or revoke and reissue such a permit using the procedures in 40 C.F.R. §§ 70.7(g)(4) or (5)(i) and (ii) for reopening a permit for cause.

II. PROCEDURAL BACKGROUND

A. Permitting Chronology

BAAQMD held its first public comment period for the Valero permit, as well as BAAQMD’s other title V refinery permits from June through September 2002.² BAAQMD held a public hearing regarding the refinery permits on July 29, 2002. From August 5 to September 22, 2003, BAAQMD held a second public comment period for the permits. EPA’s 45-day review of BAAQMD’s initial proposed permits ran concurrently with this second public comment period, from August 13 to September 26, 2003. EPA did not object to any of the proposed permits under CAA section 505(b)(1). The deadline for submitting CAA section 505(b)(2) petitions was November 25, 2003. EPA received petitions regarding the Valero Permit from Valero Refining Company and from Our Children’s Earth Foundation. EPA also received section 505(b)(2) petitions regarding three of BAAQMD’s other refinery permits.

On December 1, 2003, BAAQMD issued its initial title V permits for the Bay Area refineries, including the Valero facility. On December 12, 2003, EPA informed the District of EPA’s finding that cause existed to reopen the refinery permits because the District had not submitted proposed permits to EPA as required by title V, Part 70 and BAAQMD’s approved title V program. *See* Letter from Deborah Jordan, Director, Air Division, EPA Region 9 to Jack Broadbent, Air Pollution Control Officer, Bay Area Air Quality Management District, dated December 12, 2003. EPA’s finding was based on the fact that the District had substantially revised the permits in response to public comments without re-submitting proposed permits to EPA for another 45-day review. As a result of the reopening, EPA required BAAQMD to submit to EPA new proposed permits allowing EPA an additional 45-day review period and an opportunity to object to a permit if it failed to meet the standards set forth in section 505(b)(1).

On December 19, 2003, EPA dismissed all of the section 505(b)(2) petitions seeking objections to the refinery permits as unripe because of the just-initiated reopening process. *See e.g.*, Letters from Deborah Jordan, Director, Air Division, EPA Region 9, to John T. Hansen,

²There are a total of five petroleum refineries in the Bay Area: Chevron Products Company’s Richmond refinery, ConocoPhillips Company’s San Francisco Refinery in Rodeo, Shell Oil Company’s Martinez Refinery, Tesoro Refining and Marketing Company’s Martinez refinery, and Valero Refining Company’s Benicia facility.

Pillsbury Winthrop, LLP (representing Valero) and to Marcelin E. Keever, Environmental Law and Justice Clinic, Golden Gate University School of Law (representing Our Children's Earth Foundation and other groups) dated December 19, 2003. EPA also stated that the reopening process would allow the public an opportunity to submit new section 505(b)(2) petitions after the reopening was completed. In February 2004, three groups filed challenges in the United States Court of Appeals for the Ninth Circuit regarding EPA's dismissal of their section 505(b)(2) petitions. The parties resolved this litigation by a settlement agreement under which EPA agreed to respond to new petitions (i.e., those submitted after EPA's receipt of BAAQMD's re-proposed permits, such as this Petition) from the litigants by March 15, 2005. *See* 69 Fed. Reg. 46536 (Aug. 3, 2004).

BAAQMD submitted a new proposed permit for Valero to EPA on August 26, 2004; EPA's 45-day review period ended on October 10, 2004. EPA objected to the Valero Permit under CAA section 505(b)(1) on one issue: the District's failure to require adequate monitoring, or a design review, of thermal oxidizers subject to EPA's New Source Performance Standards and National Emission Standards for Hazardous Air Pollutants.

B. Timeliness of Petition

The deadline for filing section 505(b)(2) petitions expired on December 9, 2004. EPA finds that the Petition was submitted on December 7, 2004, which is within the 60-day time frame established by the Act and Part 70. EPA therefore finds that the Petition is timely.

III. ISSUES RAISED BY PETITIONER

A. Compliance with Applicable Requirements

Petitioner alleges that EPA must object to the Permit on the basis of alleged deficiencies Petitioner claims EPA identified in correspondence with the District dated July 28, August 2, and October 8, 2004. Petitioner alleges that EPA and BAAQMD engaged in a procedure that allowed issuance of a deficient Permit. Petition at 6-10. EPA disagrees with Petitioner that it was required to object to the Permit under section 505(b)(1) or that it followed an inappropriate procedure during its 45-day review period.

As a threshold matter, EPA notes that Petitioner's claims addressed in this section are limited to a mere paraphrasing of comments EPA provided to the District in the above-referenced correspondence. Petitioner did not include in the Petition any additional facts or legal analysis to support its claims that EPA should object to the Permit. Section 505(b)(2) of the Act places the burden on the petitioner to "demonstrate[] to the Administrator that the permit is not in compliance" with the applicable requirements of the Act or the requirements of part 70. *See also* 40 C.F.R. § 70.8(c)(1); *NYPIRG*, 321 F.3d at 333 n.11. Furthermore, in reviewing a petition to object to a title V permit because of an alleged failure of the permitting authority to meet all procedural requirements in issuing the permit, EPA considers whether the petitioner has

demonstrated that the permitting authority's failure resulted in, or may have resulted in, a deficiency in the content of the permit. *See* CAA § 505(b)(2); *see also* 40 C.F.R. § 70.8(c)(1); *In the Matter of Los Medanos Energy Center*, at 11 (May 24, 2004) ("*Los Medanos*"); *In the Matter of Doe Run Company Buick Mill and Mine*, Petition No. VII-1999-001, at 24-25 (July 31, 2002) ("*Doe Run*"). Petitioner bears the burden of demonstrating a deficiency in the permit whether the alleged flaw was first identified by Petitioner or by EPA. *See* 42 U.S.C. § 7661d(b)(2). Because this section of the Petition is little more than a summary of EPA's comments on the Permit, with no additional information or analysis, it does not demonstrate that there is a deficiency in the Permit.

1. EPA's July 28 and August 2, 2004 Correspondence

Petitioner overstates the legal significance of EPA's correspondence to the District dated July 28 and August 2, 2004. This correspondence, which took place between EPA and the District during the permitting process but before BAAQMD submitted the proposed Permit to EPA for review, was clearly identified as "issues for discussion" and did not have any formal or legal effect. Nonetheless, EPA is addressing the substantive aspects of Petitioner's allegation regarding the applicability and enforceability of provisions relating to 40 C.F.R. § 60.104(a)(1) in Section III.G.1.

2 Attachment 2 of EPA's October 8, 2004 Letter

EPA's letter to the District dated October 8, 2004 contained the Agency's formal position with respect to the proposed Permit. *See* Letter from Deborah Jordan, Director, Air Division, EPA Region 9 to Jack Broadbent, Air Pollution Control Officer, BAAQMD, dated October 8, 2004 ("EPA October 8, 2004 Letter"). Attachment 2 of the letter requested the District to review whether the following regulations and requirements were appropriately handled in the Permit:

- Applicability of 40 C.F.R. Part 63, Subpart CC to flares
- Applicability of Regulation 8-2 to cooling towers
- Applicability of NSPS Subpart QQQ to new process units
- Applicability of NESHAP Subpart FF to benzene waste streams according to annual average water content
- Compliance with NESHAP Subpart FF for benzene waste streams
- Parametric monitoring for electrostatic precipitators

EPA and the District agreed that this review would be completed by February 15, 2005 and that the District would solicit public comment for any necessary changes by April 15, 2005. Contrary to Petitioner's allegation, EPA's approach to addressing these uncertainties was appropriate. The Agency pressed the District to re-analyze these issues and obtained the District's agreement to follow a schedule to bring these issues to closure. EPA notes again that the Petition itself provides no additional factual or legal analysis that would resolve these applicability issues and demonstrate that the Permit is indeed lacking an applicable requirement

Progress in resolving these issues is attributable solely to the mechanism set in place by EPA and the District.

EPA has received the results of BAAQMD's review, see, Letter from Jack Broadbent, Air Pollution Control Officer, BAAQMD, to Deborah Jordan, Director, Air Division, EPA Region 9, dated February 15, 2005 ("BAAQMD February 15, 2005 Letter"), and is making the following findings.

a. Applicability of 40 C.F.R. Part 63, Subpart CC to Flares

This issue is addressed in Section III.H

b. Cooling Tower Monitoring

This issue is addressed at Section III.G.3

Applicability of NSPS Subpart QQQ to New Process Units

Petitioner claims EPA determined that the Statement of Basis failed to discuss the applicability of NSPS Subpart QQQ for two new process units at the facility.

In an applicability determination for Valero's sewer collection system (S-161), the District made a general reference to two new process units that had been constructed since 1987, the date after which constructed, modified, or reconstructed sources became subject to New Source Performance Standard ("NSPS") Subpart QQQ. The District further indicated that process wastewater from these units is hard-piped to an enclosed system. However, the District did not discuss the applicability of Subpart QQQ for these units or the associated piping. As a result, it was not clear whether applicable requirements were omitted from the proposed Permit.

In response to EPA's request for more information on this matter, the District stated in a letter dated February 15, 2005¹ that the process units are each served by separate storm water and sewer systems. The District has concluded that the storm water system is exempt from Subpart QQQ pursuant to 40 C.F.R. 60.692-1(d)(1). However, with regard to the sewer system, the District stated the following:

The second sewer system is the process drain system that contains oily water waste streams. This system is "hard-piped" to the slop oil system where the wastewater is separated and sent to the sour water stripper. From the sour water stripper, the wastewater [is] sent directly to secondary treatment in the WWTP where it is processed in the Biox units.

¹See Letter from Jack Broadbent, Executive Office/APCO, Bay Area Air Quality Management District to Deborah Jordan, Director, Air Division, EPA Region 9.

The District will review the details of the new process drain system and determine the applicable standards. A preliminary review indicates that, since this system is hard-piped with no emissions, the new process drain system may have been included in the slop oil system, specifically S-81 and/or S104. If this is the case, Table IV-J33 will be reviewed and updated, as necessary, to include the requirements of the new process drain system.

The District's response indicates that the Permit may be deficient because it may lack applicable requirements. Therefore, EPA is granting Petitioner's request to object to the Permit. The District must determine what requirements apply to the new process drain system and add any applicable requirements to the Permit as appropriate.

d. Management of Non-aqueous Benzene Waste Streams Pursuant to 40 C.F.R. Part 61, Subpart FF

Petitioner claims that EPA identified an incorrect applicability determination regarding benzene waste streams and NESHAP Subpart FF. Referencing previous EPA comments, Petitioner notes that the restriction contained in 40 C.F.R. § 61.342(c)(1) was ignored by the District in the applicability determination it conducted for the facility.

The Statement of Basis for the proposed Permit included an applicability determination for Valero's Sewer Pipeline and Process Drains, which stated the following:

Valero complies with FF through 61.342(e)(2)(i), which allows the facility 6 Mg/yr of uncontrolled benzene waste. Thus, facilities are allowed to choose whether the benzene waste streams are controlled or uncontrolled as long as the uncontrolled stream quantities total less than 6 Mg/yr. Because the sewer and process drains are uncontrolled, they are not subject to 61.346, the standards for individual drain systems.

In its October 8, 2004 letter, EPA raised concerns over this applicability determination due to the District's failure to discuss the control requirements in 40 C.F.R. § 61.342(c)(1). Under the chosen compliance option, only wastes that have an average water content of 10% or greater may go uncontrolled (see 40 C.F.R. § 61.342(e)(2)) and it was not clear from the applicability determination that the emission sources met this requirement. In response to EPA's request for more information on this matter, the BAAQMD stated in its February 15, 2005 letter, "In the Revision 2 process, the District will determine which waste streams at the refineries are non-aqueous benzene waste streams. Section 61.342(e)(1) will be added to the source-specific tables for any source handling such waste. The District has sent letters to the refineries requesting the necessary information."

The District's response indicates that the Permit may be deficient because it may lack an applicable requirement, specifically Section 61.342(e)(1). Therefore, EPA is granting Petitioner's request to object to the Permit. The District must reopen the Permit to add Section

61.342(e)(1) to the source-specific tables for all sources that handle non-aqueous benzene waste streams or explain in the Statement of Basis why Section 61.342(e)(1) does not apply.

e. 40 C.F.R. Part 61, Subpart FF - 6BQ Compliance Option

Referencing EPA's October 8, 2004 letter, Petitioner claims that EPA identified an incorrect applicability determination regarding the 6BQ compliance option for benzene waste streams under 40 C.F.R. § 61.342(e). Petitioner claims that this should have resulted in an objection by EPA.

The EPA comment referenced by Petitioner is issue #12 in Attachment 2 of the Agency's October 8, 2004 letter to the BAAQMD. In that portion of its letter, EPA identified incorrect statements regarding the wastes that are subject to the 6 Mg/yr limit under 40 C.F.R. § 61.342(e)(2)(i). Specifically, the District stated that facilities are allowed to choose whether the benzene waste streams are controlled or uncontrolled as long as the uncontrolled stream quantities total less than 6 Mg/yr. In actuality, the 6 Mg/yr limit applies to all aqueous benzene wastes (both controlled and uncontrolled).

The fundamental issues raised by the EPA October 8, 2004 Letter were 1) whether or not the refineries are in compliance with the requirements of the benzene waste operations NESHAP, and 2) the need to remove the incorrect language from the Statement of Basis. The first issue is a matter of enforcement and does not necessarily reflect a flaw in the Permit. Absent information indicating that the refinery is actually out of compliance with the NESHAP, there is no basis for an objection by EPA. The second issue has already been corrected by the District. In response to EPA's comment, the District revised the Statement of Basis to state that the 6 Mg/yr limit applies to the benzene quantity in the total aqueous waste stream. See December 16, 2004 Statement of Basis at 26. Therefore, EPA is denying Petitioner's request to object to the Permit. However, in responding to this Petition, EPA identified additional incorrect language in the Permit. Specifically, Table VII-Refinery states, "Uncontrolled benzene <6 megagrams/year." See Permit at 476. As discussed above, this is clearly inconsistent with 40 C.F.R. § 61.342(e)(2). In addition, Table IV-Refinery contains a similar entry that states, "Standards: General; [Uncontrolled] 61.342(e)(2) Waste shall not contain more than 6.0 Mg/yr benzene." See Permit at 51. As a result, under a separate process, EPA is reopening the Permit pursuant to its authority under 40 C.F.R. § 70.7(g) to require that the District fix this incorrect language.

f. Parametric Monitoring for Electrostatic Precipitators

Petitioner claims EPA found that the Permit contains deficient particulate monitoring for sources that are abated by electrostatic precipitators (ESPs) and that are subject to limits under SIP-approved District Regulations 6-310 and 6-311. Petitioner requests that EPA object to the Permit to require appropriate monitoring.

BAAQMD Regulation 6-310 limits particulate matter emissions to 0.15 grains per dry

standard cubic foot, and Regulation 6-311 contains a variable limit based on a source's process weight rate. Because Regulation 6 does not contain monitoring provisions, the District relied on its periodic monitoring authority to impose monitoring requirements on sources S-5, S-6, and S-10 to ensure compliance with these standards. See 40 C.F.R. § 70.6(a)(3)(i)(B); BAAQMD Reg. 6-503; BAAQMD Manual of Procedures, Vol. III, Section 4.6. For sources S-5 and S-6, the Permit requires annual source tests for both emission limits. For S-10, the Permit requires an annual source test to demonstrate compliance with Regulation 6-310 but no monitoring is required for Regulation 6-311.

With regard to monitoring for Regulation 6-311 for source S-10, the Permit is inconsistent with the Statement of Basis. The final Statement of Basis indicates that Condition 19466, Part 9 should read, "The Permit Holder shall perform an annual source test on Sources S-5, S-6, S-8, S-10, S-11, S-12, S-176, S-232, S-233 and S-237 to demonstrate compliance with Regulation 6-311 (PM mass emissions rate not to exceed 4.10P0.67 lb/hr)." See December 16, 2004 Statement of Basis at 84. However, Part 9 of Condition 19466 in the Permit states that the monitoring requirement only applies to S-5 and S-6. December 16, 2004 Permit at 464. In addition, Table VII-B1 states that monitoring is not required. Therefore, EPA is granting Petitioner's request to object to the Permit as it pertains to monitoring S-10 for compliance with Regulation 6-311. The District must reopen the Permit to add monitoring requirements adequate to assure compliance with the emission limit or explain in the Statement of Basis why it is not needed.

Regarding the annual source tests for sources S-5, S-6, and S-10, EPA believes that an annual testing requirement is inadequate in the absence of additional parametric monitoring because proper operation and maintenance of the ESPs is necessary in order to achieve compliance with the emission limits. In the BAAQMD February 15, 2005 Letter, the District stated that it intends to "propose a permit condition requiring the operator to conduct an initial compliance demonstration that will establish a correlation between opacity and particulate emissions." Thus, EPA concludes the Permit does not meet the Part 70 standard that it contain periodic monitoring sufficient to yield reliable data from the relevant time period that are representative of the source's compliance. See 40 C.F.R. § 70.6(a)(3)(i)(B). Therefore, EPA is granting Petitioner's request to object to the Permit. At a minimum, the Permit must contain monitoring which yields data that are representative of the source's compliance with its permit terms and conditions.

3. Attachment 3 of EPA's October 8, 2004 Letter

Attachment 3 of EPA's October 8, 2004 Letter memorialized the District's agreement to address two issues related to the Valero Permit. One issue pertains to applicability determinations for support facilities. EPA does not have adequate information demonstrating that the Valero facility has support facilities, nor has Petitioner provided any such information. EPA therefore finds no basis to object to the Permit and denies the Petition as to this issue.

The second issue pertains to the removal of a permit shield from BAAQMD Regulation 8-2. EPA has reviewed the most recent version of the Permit and determined that the shield was removed. Therefore, EPA is denying Petitioner's request to object to the permit as this issue is moot.

B Permit Application

Applicable Requirements

Petitioner alleges that EPA must object to the Permit because it contains unresolved applicability determinations due to "deficiencies in the application and permit process" as identified in Attachment 2 to EPA's October 8, 2004 letter to the District.

During EPA's review of the Permit, BAAQMD asserted that, notwithstanding any alleged deficiencies in the application and permit process, the Permit sufficiently addressed these items or the requirements were not applicable. EPA requested that the District review some of the determinations of adequacy and non-applicability that it had already made. EPA believes that this process has resulted in improved applicability determinations. Petitioners have failed to demonstrate that such a generalized allegation of "deficiencies in the application and permit process" actually resulted in or may have resulted in a flaw in the Permit. Therefore, EPA denies the Petition on this basis.

2. Identification of Insignificant Sources

Petitioner contends that the permit application failed to list insignificant sources, resulting in a "lack of information ... [that] inhibits meaningful public review of the Title V permit." Petitioner further contends that, contrary to District permit regulations, the application failed to include a list of all emission units, including exempt and insignificant sources and activities, and failed to include emissions calculations for each significant source or activity. Petitioner lastly alleges that the application lacked an emissions inventory for sources not in operation during 1993.

Under Part 70, applications may not omit information needed to determine the applicability of, or to impose, any applicable requirement, or to evaluate a required fee amount. 40 C.F.R. § 70.5(c). Emission calculations in support of the above information are required. 40 C.F.R. § 70.5(c)(3)(viii). An application must also include a list of insignificant activities that are exempted because of size or production rate. 40 C.F.R. § 70.5(c).

District Regulation 2-6-405.4 requires applications for title V permits to identify and describe "each permitted source at the facility" and "each source or other activity that is exempt from the requirement to obtain a permit" EPA's Part 70 regulations, which prescribe the minimum elements for approvable state title V programs, require that applications include a list of insignificant sources that are exempted on the basis of size or production rate. 40 C.F.R.

§ 70.5(c). EPA's regulations have no specific requirement for the submission of emission calculations to demonstrate why an insignificant source was included in the list.

Petitioner makes no claim that the Permit inappropriately exempts insignificant sources from any applicable requirements or that the Permit omits any applicable requirements. Similarly, Petitioner makes no claim that the inclusion of emission calculations in the application would have resulted in a different permit. Because Petitioner failed to demonstrate that the alleged flaw in the permitting process resulted in, or may have resulted in, a deficiency in the permit, EPA is denying the Petition on this ground.

EPA also denies Petitioner's claim because Petitioner fails to substantiate its generalized contention that the Permit is flawed. The Statement of Basis unambiguously explains that Section III of the Permit, *Generally Applicable Requirements*, applies to all sources at the facility, including insignificant sources:

This section of the permit lists requirements that generally apply to all sources at a facility including insignificant sources and portable equipment that may not require a District permit....[S]tandards that apply to insignificant or unpermitted sources at a facility (e.g., refrigeration units that use more than 50 pounds of an ozone-depleting compound), are placed in this section.

Thus, all insignificant sources subject to applicable requirements are properly covered by the Permit.

Petitioner also fails to explain how meaningful public review of the Permit was "inhibited" by the alleged lack of a list of insignificant sources from the permit application.⁴ We find no permit deficiency otherwise related to missing insignificant source information in the Permit application.

In addition, Petitioner fails to point to any defect in the Permit as a consequence of any missing significant emissions calculations in the permit application. The Statement of Basis for Section IV of the Permit states, "This section of the Permit lists the applicable requirements that apply to permitted or significant sources." Therefore, all significant sources and activities are properly covered by the Permit.

With respect to a missing emissions inventory for sources not in operation during 1993, Petitioner again fails to point to any resultant flaw in the Permit. These sources are appropriately addressed in the Permit.

For the foregoing reasons, EPA is denying the Petition on these issues

⁴ In another part of the Petition, addressed below, Petitioner argues that the District's delay in providing requested information violated the District's public participation procedures approved to meet 40 C.F.R. § 70.7.

3. Identification of Non-Compliance

Petitioner argues that the District should have compelled the refinery to identify non-compliance in the application and provide supplemental information regarding non-compliance during the application process prior to issuance of the final permit on December 1, 2003. In support, Petitioner cites the section of its Petition (III.D.) alleging that the refinery failed to properly update its compliance certification.

Title V regulations do not require an applicant to supplement its application with information regarding non-compliance,⁵ unless the applicant has knowledge of an incorrect application or of information missing from an application. Pursuant to 40 C.F.R. § 70.5(c)(8)(i) and (iii)(C), a standard application form for a title V permit must contain, *inter alia*, a compliance plan that describes the compliance status of each source with respect to all applicable requirements and a schedule of compliance for sources that are not in compliance with all applicable requirements at the time the permit issues. Section 70.5(b), *Duty to supplement or correct application*, provides that any applicant who fails to submit any relevant facts, or who has submitted incorrect information, in a permit application, shall, upon becoming aware of such failure or incorrect submission, promptly submit such supplemental or corrected information. In addition, Section 70.5(c)(5) requires the application to include “[o]ther specific information that may be necessary to implement and enforce other applicable requirements ... or to determine the applicability of such requirements.”

Petitioner does not show that the refinery had failed to submit any relevant facts, or had submitted incorrect information, in its 1996 initial permit application. Consequently, the duty to supplement or correct the permit application described at 40 C.F.R. § 70.5(b) has not been triggered in this case.

Moreover, EPA disagrees that the requirement of 40 C.F.R. § 70.5(c)(5) requires the refinery to update compliance information in this case. The District is apprised of all new information arising after submittal of the initial application – such as NOV’s, episodes and complaints – that may bear on the implementation, enforcement and/or applicability of applicable requirements. In fact, the District has an inspector assigned to the plant to assess compliance at least on a weekly basis. Therefore, it is not necessary to update the application with such information, as it is already in the possession of the District. Petitioner has failed to demonstrate that the alleged failure to update compliance information in the application resulted in, or may have resulted in, a deficiency in the Permit. For the foregoing reasons, EPA denies the Petition on this issue.

C. Assurance of Compliance with All Applicable Requirements Pursuant to the Act, Part 70 and BAAQMD Regulations

⁵ As discussed *infra*, title V regulations also do not require permit applicants to update their compliance certifications pending permit issuance.

1 Compliance Schedule

In essence, Petitioner claims that the District's consideration of the facility's compliance history during the title V permitting process was flawed because the District decided not to include a compliance schedule in the Permit despite a number of NOVs and other indications, in Petitioner's view, of compliance problems, and the District did not explain why a compliance schedule is not necessary. Specifically, Petitioner alleges that EPA must object to the Permit because the "District ignored evidence of recurring or ongoing compliance problems at the facility, instead relying on limited review of outdated records, to conclude that a compliance schedule is unnecessary." Petition at 11-19. Petitioner further alleges that a compliance schedule is necessary to address NOVs issued to the plant (including many that are still pending)⁶, one-time episodes⁷ reported by the plant, recurring violations and episodes at certain emission units, complaints filed with the District, and the lack of evidence that the violations have been resolved. The relief sought by Petitioner is for the District to include "a compliance schedule in the Permit, or explain why one was not necessary." *Id.* Petitioner additionally charges that, due to the facility's poor compliance history, additional monitoring, recordkeeping and reporting requirements are warranted to assure compliance with all applicable requirements. *Id.*

Section 70.6(c)(3) requires title V permits to include a schedule of compliance consistent with Section 70.5(c)(8). Section 70.5(c)(8) prescribes the requirements for compliance schedules to be submitted as part of a permit application. For sources that are not in compliance with applicable requirements at the time of permit issuance, compliance schedules must include "a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance." 40 C.F.R. § 70.5(c)(8)(iii)(C). The compliance schedule should "resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the source is subject." *Id.*

In determining whether an objection is warranted for alleged flaws in the procedures leading up to permit issuance, such as Petitioner's claims that the District improperly considered the facility's compliance history, EPA considers whether a Petitioner has demonstrated that the alleged flaws resulted in, or may have resulted in, a deficiency in the permit's content. See CAA § 505(b)(2) (requiring an objection "if the petitioner demonstrates ... that the permit is not in compliance with the requirements of this Act...."). In Petitioner's view, the deficiency that resulted here is the lack of a compliance schedule. For the reasons explained below, EPA grants

⁶BAAQMD Regulation 1:401 provides for the issuance of NOVs: "Violation Notice: A notice of violation or citation shall be issued by the District for all violations of District regulations and shall be delivered to persons alleged to be in violation of District regulations. The notice shall identify the nature of the violation, the rule or regulation violated, and the date or dates on which said violation occurred."

⁷According to BAAQMD, "episodes" are "reportable events, but are not necessarily violations." Letter from Adan Schwartz, Senior Assistant Counsel, BAAQMD to Gerardo Rios, EPA Region IX, dated January 31, 2005.

the Petition to require the District to address in the Permit's Statement of Basis the NOV's that the District has issued to the facility and, in particular, NOV's that have not been resolved because they may evidence noncompliance at the time of permit issuance. EPA denies the Petition as to Petitioner's other compliance schedule issues.

a. Notices of Violation

In connection with its claim that the Permit is deficient because it lacks a compliance schedule, Petitioner states that the District issued 85 NOV's to Valero between 2001 and 2004 and 51 NOV's in 2003 and 2004. Petitioner highlights that, as of October 22, 2004, all 51 NOV's issued in 2003 and 2004 were unresolved and still "pending." Petition at 14-15. To support its claims, Petitioner attached to the Petition various District compliance reports and summaries, including a list of NOV's issued between January 1, 2003 and October 1, 2004. Thus, Petitioner essentially claims that the District's consideration of these NOV's during the title V permitting process was flawed, because the District did not include a compliance schedule in the Permit and did not explain why a compliance schedule is not necessary.

As noted above, EPA's Part 70 regulations require a compliance schedule for "applicable requirements for sources that are not in compliance with those requirements at the time of permit issuance." 40 C.F.R. §§ 70.6(c)(3), 70.5(c)(8)(iii)(C). Consistent with these requirements, EPA has stated that a compliance schedule is not necessary if a violation is intermittent, not on-going, and has been corrected before the permit is issued. *See In the Matter of New York Organic Fertilizer Company*, Petition Number II-2002-12 at 47-49 (May 24, 2004). EPA has also stated that the permitting authority has discretion not to include in the permit a compliance schedule where there is a pending enforcement action that is expected to result in a compliance schedule (i.e., through a consent order or court adjudication) for which the permit will be eventually reopened. *See In the Matter of Huntley Generating Station*, Petition Number II-2002-01, at 4-5 (July 31, 2003); *see also In the Matter of Dunkirk Power, LLC*, Petition Number II-2002-02, at 4-5 (July 31, 2003).⁸

Using the District's own enforcement records, Petitioner has demonstrated that approximately 50 NOV's were pending before the District at the time it proposed the revised Permit. The District's most recent statements, as of January 2005, do not dispute this fact.⁹ The

⁸These orders considered whether a compliance schedule was necessary to address (i) opacity violations for which the source had included a compliance schedule with its application; and (ii) PSD violations that the source contested and was litigating in federal district court. As to the uncontested opacity violations, EPA required the permitting authority to reopen the permits to either incorporate a compliance schedule or explain that a compliance schedule was not necessary because the facility was in compliance. As to the contested PSD violations, EPA found that "[i]t is entirely appropriate for the [state] enforcement process to take its course" and for a compliance schedule to be included only after the adjudication has been resolved.

⁹As stated in a letter from Adan Schwartz, Senior Assistant Counsel, BAAQMD, to Gerardo Rios, Air Division, U.S. EPA Region 9, dated January 31, 2005, "The District is following up on each NOV to achieve an appropriate resolution, which will likely entail payment of a civil penalty." EPA provided a copy of this letter to

permitting record shows that the District issued the initial Permit on December 1, 2003 and the revised Permit on December 16, 2004. According to the District, the facility did not have noncompliance issues at the time it issued the initial and revised permits. The permitting record contains the following statements:

- July 2003 Statement of Basis, "Compliance Schedule" section: "The BAAQMD Compliance and Enforcement Division has conducted a review of compliance over the past year and has no records of compliance problems at this facility." July 2003 Statement of Basis at 12.

July 2003 Statement of Basis, "Compliance Status" section: "The Compliance and Enforcement Division has prepared an Annual Compliance Report for 2001. . . The information contained in the compliance report has been evaluated during the preparation of the Statement of Basis for the proposed major Facility Review permit. The main purpose of this evaluation is to identify ongoing or recurring problems that should be subject to a schedule of compliance. No such problems have been identified." July 2003 Statement of Basis at 35. This section also noted that the District issued eight NOV's to the refinery in 2001, but did not discuss any NOV's issued to the refinery in 2002 or the first half of 2003. EPA notes that there appear to have been approximately 36 NOV's issued during that time, each of which is identified as pending in the documentation provided by Petitioner.

December 16, 2004 Statement of Basis: "The facility is not currently in violation of any requirement. Moreover, the District has updated its review of recent violations and has not found a pattern of violations that would warrant imposition of a compliance schedule." December 2004 Statement of Basis at 34.

2003 Response to Comments ("RTC") (from Golden Gate University): "The District's review of recent NOV's failed to reveal any evidence of current ongoing or recurring noncompliance that would warrant a compliance schedule." 2003 RTC (GGU) at 1.

EPA finds that the District's statements at the time it issued the initial and revised Permits do not provide a meaningful explanation for the lack of a compliance schedule in the Permit. Using the District's own enforcement records, Petitioner has demonstrated that there were approximately 50 unresolved NOV's at the time the revised Permit was issued in December 2004. The District's statements in the permitting record, however, create the impression that no NOV's were pending at that time. Although the District acknowledges that there have been "recent violations," the District fails to address the fact that it had issued a significant number of NOV's to the facility and that many of the issued NOV's were still pending. Moreover, the District provides only a conclusory statement that there are no ongoing or recurring problems that

could be addressed with a compliance schedule and offers no explanation for this determination. The District's statements give no indication that it actually reviewed the circumstances underlying recently issued NOV's to determine whether a compliance schedule was necessary. The District's mostly generic statements as to the refinery's compliance status are not adequate to support the District's decision that no compliance schedule was necessary in light of the NOV's.¹⁰

Because the District failed to include an adequate discussion in the permitting record regarding NOV's issued to the refinery, and, in particular, those that were pending at the time the Permit was issued, and an explanation as to why a compliance schedule is not required, EPA finds that Petitioner has demonstrated that the District's consideration of the NOV's during the title V permitting process may have resulted in a deficiency in the Permit. Therefore, EPA is granting the Petition to require the District to either incorporate a compliance schedule in the Permit or to provide a more complete explanation for its decision not to do so.

When the District reopens the Permit, it may consider EPA's previous orders in the Huntley, Dunkirk, and New York Organic Fertilizer matters to make a reasonable determination that no compliance schedule is necessary because (i) the facility has returned to compliance; (ii) the violations were intermittent, did not evidence on-going non-compliance, and the source was in compliance at the time of permit issuance; or (iii) the District has opted to pursue the matter through an enforcement mechanism and will reopen the permit upon a consent agreement or court adjudication of the noncompliance issues. Consistent with previous EPA orders, the District must also ensure that the permit shield will not serve as a bar or defense to any pending enforcement action.¹¹ See *Huntley* and *Dunkirk* Orders at 5.

b. Episodes

Petitioner also cites the number of "episodes" at the plant in the years 2003 and 2004 as a basis for requiring a compliance schedule. Episodes are events reported by the refinery of equipment breakdown, emission excesses, inoperative monitors, pressure relief valve venting, or other facility failures. Petition at 15, n. 21. According to the District, "[e]pisodes are reportable events, but are not necessarily violations. The District reviews each reported episode. For those that represent a violation, an NOV is issued." Letter from Adan Schwartz, Senior Assistant Counsel, BAAQMD to Gerardo Rios, EPA Region IX, dated January 31, 2005. The summary chart entitled "BAAQMD Episodes" attached to the Petition shows that the District specifically

¹⁰In contrast, EPA notes that the state permitting authority in the Huntley and Dunkirk Orders provided a thorough record as to the existence and circumstances regarding the pending NOV's by describing them in detail in the permits and acknowledging the enforcement issues in the public notices for the permits. Huntley at 6, Dunkirk at 6. In addition, EPA found that the permits contained "sufficient safeguards" to ensure that the permit shields would not preclude appropriate enforcement actions. *Id.*

¹¹After reviewing the permit shield in the Permit, EPA finds nothing in it that could serve as a defense to enforcement of the pending NOV's. The District, however, should still independently perform this review when it reopens the Permit.

records for each episode, under the heading "Status," its determination for each episode: (i) no action; (ii) NOV issued; (iii) pending; and (iv) void. This document supports the District's statement that it reviews each episode to see whether it warrants an NOV. Because not every episode is evidence of noncompliance, the number of episodes is not a compelling basis for determining whether a compliance schedule is necessary. Moreover, Petitioner did not provide additional facts, other than the summary chart, to demonstrate that any reported episodes are violations. EPA therefore finds that Petitioner has not demonstrated that the District's consideration of the various episodes may have resulted in a deficiency in the Permit, and EPA denies the Petition as to this issue.

c. Repeat Violations and Episodes at Particular Units

Petitioner claims that certain units at the plant are responsible for multiple episodes and violations, "possibly revealing serious ongoing or recurring compliance issues." Petition at 16. The Petition then cites, as evidence, the existence of 16 episodes and 8 NOVs for the FCCU Catalytic Regenerator (S-5), 9 episodes and 4 NOVs for a hot furnace (S-220), 9 episodes and 7 NOVs for the Heat Recovery Steam Generator (S-1031), and 3 episodes and 2 NOVs for the South Flare (S-18).

A close examination of the BAAQMD Episodes chart relied upon by Petitioner, however, reveals that the failures identified for these episodes and NOVs are actually quite distinct from one another, often covering different components and regulatory requirements. This fact makes sense as emission and process units at refineries tend to be very complex with multiple components and multiple applicable requirements. When determining whether a compliance schedule is necessary for ongoing violations at a particular emission unit based on multiple NOVs issued for that unit, it would be reasonable for a permitting authority to consider whether the violations pertain to the same component of the emission unit, the cause of the violations is the same, and the cause has not been remedied through the District's enforcement actions. Again, Petitioner has failed to demonstrate that the District's consideration of the various repeat episodes and alleged violations may have resulted in a deficiency in the Permit. EPA therefore denies the Petition as to this issue.

d. Complaints

Petitioner contends that the "numerous complaints" received by the District between 2001 and 2004 also lay a basis for the need for a compliance schedule. These complaints were generally for odor, smoke or other concerns. As with the episodes discussed above, the mere existence of a complaint does not evidence a regulatory violation. Moreover, where the District has verified certain complaints, it has issued an NOV to address public nuisance issues. As such, even though complaints may indicate problems that need additional investigation, they do not necessarily lay the basis for a compliance schedule. Because Petitioner has not demonstrated that the complaints received by the District may have resulted in a deficiency in the Permit, EPA denies the Petition as to this issue.

e. Allegation that Problems are not Resolved

Petitioner proposes three “potential solutions to ensure compliance:” (1) the District should address recurring compliance at specific emission units, namely S-5, S-220 and S-1030, (2) the District should impose additional maintenance or installation of monitoring equipment, or new monitoring methods to address the 30 episodes involving inoperative monitors; and (3) the District should impose additional operational and maintenance requirements to address recurring problems since the source is not operating in compliance with the NSPS requirement to maintain and operate the facility in a manner consistent with good air pollution control practice for minimizing emissions. Petition at 18-19.

In regard to Petitioner’s first claim for relief, EPA has already explained that Petitioner has not demonstrated that the District’s consideration of the various ‘recurring’ violations for particular emission units may have resulted in a deficient permit or justifies the imposition of a compliance schedule. In regard to the second claim for relief, the 30 episodes cited by Petitioner are for different monitors, and spread over a multi-year period. As long as the District seeks prompt corrective action upon becoming aware of inoperative monitors, EPA does not see this as a basis for additional maintenance and monitoring requirements for the monitors. Moreover, EPA could only require additional monitoring requirements to the extent that the underlying SIP or some other applicable requirement does not already require monitoring. *See* 40 C.F.R. § 70.6(a)(3)(i)(B). Lastly, in response to Petitioner’s third claim for relief seeking imposition of additional operation and maintenance requirements due to an alleged violation of the “good air pollution control practice” requirements of the NSPS, EPA believes that such an allegation of noncompliance is too speculative to warrant a compliance schedule without further investigation. As such, EPA finds that Petitioner has not demonstrated that the District’s failure to include any of the permit requirements Petitioner requests here resulted in, or may have resulted in, a deficient permit, and EPA denies the Petition on this ground.

2. Non-Compliance Issues Raised by Public Comments

Petitioner claims that since the District failed to resolve New Source Review (“NSR”)¹² compliance issues, EPA should object to the issuance of the Permit and require either a compliance schedule or an explanation that one is not necessary. Petition at 21. Petitioner claims to have identified four potential NSR violations at the refinery, as follows: (i) an apparent substantial rebuild of the fluid catalytic cracking unit (“FCCU”) regenerator (S-5) without NSR review,¹³ based on information that large, heavy components of the FCCU were recently

¹² “NSR” is used in this section to include both the nonattainment area New Source Review permit program and the attainment area Prevention of Significant Deterioration (“PSD”) permit program.

¹³ Petitioner also alleges that S-5 went through a rebuild without imposition of emission limitations and other requirements of 40 C.F.R. § 63 Subpart UUU. EPA notes that the requirements of Subpart UUU are included in the Permit with a future effective date of April 11, 2005. Permit at 80.

replaced; (ii) apparent emissions increases at two boiler units (S-3 and S-4) beyond the NSR significance level for modified sources of NO_x, based on the District's emissions inventory indicating dramatic increases in NO_x emissions between 1993 and 2001; and (iii) an apparent significant increase in SO₂ emissions at a coker burner (S-6), based on the District's emissions inventory indicating a dramatic increase in SO₂ emissions in 2001 over the highest emission rate during 1993 to 2000.¹⁴ Petition at 20.

All sources subject to title V must have a permit to operate that assures compliance by the source with all applicable requirements. *See* 40 C.F.R. § 70.1(b); CAA §§ 502(a), 504(a). Such applicable requirements include the requirement to obtain NSR permits that comply with applicable NSR requirements under the Act, EPA regulations, and state implementation plans. *See generally* CAA §§ 110(a)(2)(C), 160-69, 172(c)(5), and 173; 40 C.F.R. §§ 51.160-66 and 52.21. NSR requirements include the application of the best available control technology ("BACT") to a new or modified source that results in emissions of a regulated pollutant above certain legally-specified amounts.¹⁵

Based on the information provided by Petitioner, Petitioner has failed to demonstrate that NSR permitting and BACT requirements have been triggered at the FCCU catalytic regenerator S-5, boilers S-3 or S-4, or coke burner S-6. With regard to the FCCU catalytic regenerator, Petitioner's only evidence in support of its claim is (i) an April 8, 1999, Energy Information Administration press release that states that the refinery announced the shutdown of its FCCU on March 19, 1999, and announced the restarting of the FCCU on April 1, 1999,¹⁶ and (ii) information posted at the Web site of Surface Consultants, Inc., stating that "several large, heavy components on [the FCCU] needed replacement." *See* Petition, Exhibit A. Petitioner offers no evidence regarding the nature of these activities, whether the activities constitute a new or modified source under the NSR rules, or whether refinery emissions were in any way affected

¹⁴ Petitioner also takes issue with the District's position that "the [NSR] preconstruction review rules themselves are not applicable requirements, for purposes of Title V." (Petition, at 21; December 2003 Consolidated Response to Comments ("CRTC") at 6-7). Applicable requirements are defined in the District's Regulation 2-6-202 as "[a]ir quality requirements with which a facility must comply pursuant to the District's regulations, codes of California statutory law, and the federal Clean Air Act, including all applicable requirements as defined in 40 C.F.R. § 70.2." Applicable requirements are defined in 40 C.F.R. § 70.2 to include "any standard or other requirement provided for in the applicable implementation plan approved or promulgated by EPA through rulemaking under title I of the Act that implements the relevant requirements of the Act...." Since the District's NSR rules are part of its implementation plan, the NSR rules themselves are applicable requirements for purposes of title V. Since this point has little relevance to the matter at hand (i.e., whether in this case the NSR rules apply to a particular new or modified source at the refinery), EPA views the District's position as *obiter dictum*.

¹⁵ The Act distinguishes between the requirement to apply BACT, which is part of the PSD permit program for attainment areas, and the requirement to apply the lowest achievable emission rate ("LAER"), which is part of the NSR permit program for nonattainment areas. In this case, however, the District's NSR rules use the term "BACT" to signify "LAER."

¹⁶ This press release is available on the Internet at <http://www.eia.doe.gov/ncic/press/press123.html> (last viewed on February 1, 2005).

by these activities

With regard to the two boilers and the coke burner, Petitioner's only evidence in support of its claims are apparent "dramatic" increases in each of these unit's emissions inventory. However, as the District correctly notes:

"...the principal purpose of the inventory is planning; the precision needed for this purpose is fairly coarse. The inventory emissions are based, in almost all cases, on *assumed* emission factors, and *reported* throughputs. An increase in emissions from one year to the next as reflected in the inventory may be an indication that reported throughput has increased, however it does not automatically follow that the source has been modified. Unless the throughput exceeds permit limits, the increase usually represents use of previously unused, but authorized, capacity. An increase in reported throughput amount could be taken as an indication that further investigation is appropriate to determine whether a modification has occurred. However, the District would not conclude that a modification has occurred simply because reported throughput has increased."

December 1, 2003 Consolidated Response to Comments ("2003 CRTC"), at 22. Moreover, Petitioner does not claim to have sufficient evidence to establish that these units are subject to NSR permitting and the application of BACT. The essence of Petitioner's objection is the need for the District to "determine whether the sources underwent a physical change or change in the method of operation that increased emissions, which would trigger NSR." Petition at 20. Not only is Petitioner unable to establish that these units triggered NSR requirements, Petitioner is not even alleging that NSR requirements have in fact been triggered. Petitioner is merely requesting that the District make an NSR applicability determination based on Petitioner's "well-documented *concerns* regarding *potential* non-compliance." Petition at 20 (*emphasis added*).

During the title V permitting process, EPA has also been pursuing similar types of claims in another forum. As part of its National Petroleum Refinery Initiative, EPA identified four of the Act's programs where non-compliance appeared widespread among petroleum refiners, including apparent major modifications to FCCUs and refinery heaters and boilers that resulted in significant increases in NO_x and SO₂ emissions without complying with NSR requirements. However, based on the information provided by Petitioner, EPA is not prepared to conclude at this time that these units at the Valero refinery are out of compliance with NSR requirements. If EPA later determines that these units are in violation of NSR requirements, EPA may object to or reopen the title V permit to incorporate the applicable NSR requirements.¹⁷

Since Petitioner has failed to show that NSR requirements apply to these units, EPA finds

¹⁷ EPA notes that with respect to the specific claims of NSR violations raised by Petitioner in its comments, the District "intends to follow up with further investigation." December 1, 2003 CRTC, at 22. EPA encourages the District to do so, especially where, as in this case, the apparent changes in the emissions inventories are substantial.

that Petitioner has not met its burden of demonstrating a deficiency in the Permit. Therefore, the Petition is denied on this issue.

3. Intermittent and Continuous Compliance

Petitioner contends that EPA must object to the Permit because the District has interpreted the Act to require only intermittent rather than continuous compliance. Petition at 21-22. Petitioner contends that the District has a “fundamentally flawed philosophy.” Petitioner points to a statement made by the District in its Response to Public Comments, dated December 1, 2003, that “[c]ompliance by the refineries with all District and federal air regulations will not be continuous.” Petitioner contends that the District “expects only intermittent compliance” and that the District’s belief “that it need only assure ‘reasonable intermittent’ compliance” means that it failed to see the need for a compliance plan in the Permit.

EPA disagrees with Petitioner’s suggestion that the District’s view of intermittent compliance has impaired its ability to properly implement the title V program. As stated above, EPA has not concluded that a compliance plan is necessary to address the instances of non-compliance at this Facility. Moreover, the Agency disagrees with Petitioner’s interpretations of the District’s comments on the issue. For instance, EPA finds nothing in the record stating that the District’s view of the Permit, as a legal matter, is that it need assure only intermittent compliance. Rather, a fairer reading of the District’s view is that, realistically, intermittent non-compliance can be expected. As the District stated:

The District cannot rule out that instances of non-compliance will occur. Indeed at a refinery, at least occasional events of non-compliance can be predicted with a high degree of certainty. . . . Compliance by the refineries with all District and federal air regulations will not be continuous. However, the District believes the compliance record at this [Shell] and other refineries is well within a range to predict reasonable intermittent compliance. December 1, 2003 RTC at 15.

The District’s view appears to be based on experience and the practical reality that complex sources with thousands of emission points which are subject to hundreds of local and federal requirements will find themselves out of compliance, not necessarily because their permits are inadequate but because of the limits of technology and other factors. Even a source with a perfectly-drafted permit – one that requires state of the art monitoring, scrupulous recordkeeping, and regular reporting to regulatory agencies – may find itself out of compliance, not because the permit is deficient, but because of the limitations of technology and other factors.

EPA also believes that, far from sanctioning intermittent compliance, as Petitioner suggests, see Petition at 22, n. 36, the District appears committed to address it through enforcement of the Permit, when appropriate: “when non-compliance occurs, the Title V permit will enhance the ability to detect and enforce against those occurrences.” *Id.* Although the District may realistically expect instances of non-compliance, it does not necessarily excuse

them. Non-compliance may still constitute a violation and may be subject to enforcement action

For the reasons stated above, EPA denies the Petition on this ground

4. Compliance Certifications

Initial compliance certifications must be made by all sources that apply for a title V permit at the time of the permit application. *See* 40 C.F.R. § 70.5(c)(9). The Part 70 regulations do not require applicants to update their compliance certification pending issuance of the permit. Petitioner correctly points out that the District's Regulation 2-6-426 requires annual compliance certifications on "every anniversary of the application date" until the permit is issued. Petitioner claims that, other than a truncated update in 2003, the plant has failed to provide annual certifications between the initial permit application submittal in 1996 and issuance of the permit in December 2004. Petitioner believes that "defects in the compliance certification procedure have resulted in deficiencies in the Permit." Petition at 24.

In determining whether an objection is warranted for alleged flaws in the procedures leading up to permit issuance, including compliance certifications, EPA considers whether the petitioner has demonstrated that the alleged flaws resulted in, or may have resulted in, a deficiency in the permit's content. *See* CAA Section 505(b)(2) (objection required "if the petitioner demonstrates ... that the permit is not in compliance with the requirements of this Act, including the requirements of the applicable [SIP]"); 40 C.F.R. § 70.8(c)(1); *See also In the Matter of New York Organic Fertilizer Company*, Petition No. II-2002-12 (May 24, 2004), at 9. Petitioner assumes, in making its argument, that the District needs these compliance certifications to adequately review compliance for the facility. This is not necessarily true. Sources often certify compliance based upon information that has already been presented to a permitting authority or based upon NOVs or other compliance documents received from a permitting authority. The requirement for the plant to submit episode and other reports means that the District should be privy to all of the information available to the source pertaining to compliance, regardless of whether compliance certifications have been submitted annually. Finally, the District has a dedicated employee assigned as an inspector to the plant who visits the plant weekly and sometimes daily. In this particular instance, the compliance certification would likely not add much to the District's knowledge about the compliance status of the plant. EPA believes that in this case, Petitioner has failed to demonstrate that the lack of a proper initial compliance certification, or the alleged failure to properly update that initial compliance certification, resulted in, or may have resulted in, a deficiency in the permit.

D. Statement of Basis

Petitioner alleges that the Statements of Basis for the Permit issued in December 2003 and for the revised Permit, as proposed in August 2004, are inadequate. Specifically, Petitioner alleges the following deficiencies:

Neither Statement of Basis contains detailed facility descriptions, including comprehensive process flow information;

- Neither Statement of Basis contains sufficient information to determine applicability of “certain requirements to specific sources.” Petitioner specifically identifies exemptions from permitting requirements that BAAQMD allowed for tanks. Petitioner also references Attachments 2 and 3 to EPA’s October 8, 2004 letter as support for its allegation that the Statements of Basis were deficient because they did not address applicability of 40 C.F.R. Part 63, Subpart CC to flares and BAAQMD Regulation 8-2 to hydrogen plant vents.
- Neither Statement of Basis addresses BAAQMD’s compliance determinations
- The 2003 Statement of Basis was not made available on the District’s Web site during the April 2004 public comment period and does not include information about permit revisions in March and August 2004

The 2004 Statement of Basis does not discuss changes BAAQMD made to the Permit between the public comment period in August 2003 and the final version issued in December 2003, despite the District’s request for public comment on such changes.

EPA’s Part 70 regulations require permitting authorities, in connection with initiating a public comment period prior to issuance of a title V permit, to “provide a statement that sets forth the legal and factual basis for the draft permit conditions.” 40 C.F.R. § 70.7(a)(5). EPA’s regulations do not require that a statement of basis contain any specific elements; rather, permitting authorities have discretion regarding the contents of a statement of basis. EPA has recommended that statements of basis contain the following elements: (1) a description of the facility; (2) a discussion of any operational flexibility that will be utilized at the facility; (3) the basis for applying the permit shield; (4) any federal regulatory applicability determinations; and (5) the rationale for the monitoring methods selected. EPA Region V has also recommended the inclusion of the following: (1) monitoring and operational restrictions requirements; (2) applicability and exemptions; (3) explanation of any conditions from previously issued permits that are not being transferred to the title V permit; (4) streamlining requirements; and (5) certain other factual information as necessary. *See, Los Medanos*, at 10, n.16.

There is no legal requirement that a permitting authority include information such as a specific facility description and process flow diagrams in the Statement of Basis, and Petitioner has not shown how the lack of this information resulted in, or may have resulted in, a deficiency in the Permit. Thus, while a facility description and process flow diagrams might provide useful information, their absence from the Statement of Basis does not constitute grounds for objecting to the Permit.

EPA agrees, in part, that Petitioner has demonstrated the Permit is deficient because the

Statement of Basis does not explain exemptions for certain tanks. This issue is addressed more specifically in Section III.H.3.

EPA agrees with Petitioner's allegation that the Statement of Basis should have included a discussion regarding applicability of 40 C.F.R. Part 63, Subpart CC to flares and BAAQMD Regulation 8-2 to hydrogen plant vents. Applicability determinations are precisely the type of information that should be included in a Statement of Basis. This issue is addressed more specifically in Section III.H.1.

EPA addressed Petitioner's allegations relating to the sufficiency of the discussion in the Statement of Basis on the necessity of a compliance schedule in Section III.C.

EPA does not agree with Petitioner's allegations that the 2003 Statement of Basis was deficient because it was not available on the District's Web site during the 2004 public comment period or because it did not provide information about the 2004 reopening. First, EPA notes that the 2003 Statement of Basis has been available to the public on its own Web site since the initial permit was issued in December, 2003.¹⁸ In addition, Petitioner has not established a legal basis to support its claim that this information is a required element for a Statement of Basis. Petitioner also concedes that the District provided a different Statement of Basis in connection with the 2004 reopening. Petitioner does not claim that the Permit is deficient as a result of any of these alleged issues regarding the Statement of Basis, therefore, EPA denies the Petition on this ground..

EPA does not agree with Petitioner's allegations that the 2004 Statement of Basis was deficient because it did not discuss any changes made between the draft permit available in August 2003 and the final Permit issued in December 2003. Petitioner has not established a legal basis to support its claim that this information is a required element for a Statement of Basis. Petitioner has not demonstrated that the Permit is deficient because the District did not provide this discussion in the 2004 Statement of Basis. Moreover, Petitioner could have obtained much of this information by reviewing the District's response to comments received during the 2003 public comment period, which was dated December 1, 2003. Therefore, EPA denies the Petition on this ground.

E Permit Shields

The District rules allow two types of permit shields. The permit shield types are defined as follows: (1) A provision in a title V permit explaining that specific federally enforceable regulations and standards do not apply to a source or group of sources, or (2) A provision in a title V permit explaining that specific federally enforceable applicable requirements for monitoring, recordkeeping and/or reporting are subsumed because other applicable requirements

¹⁸Title V permits and related documents are available through Region IX's Electronic Permit Submittal System at <http://www.epa.gov/region09/air/permit/index.html>.

for monitoring, recordkeeping, and reporting in the permit will assure compliance with all emission limits. The District uses the second type of permit shield for all streamlining of monitoring, recordkeeping, and reporting requirements in title V permits. The District's Statement of Basis explains: "Compliance with the applicable requirement contained in the permit automatically results in compliance with any subsumed (= less stringent) requirement." See December 2003 Statement of Basis at 27.

40 C.F.R. §§ 60.7(c) and (d)

Petitioner alleges that the permit shield in Table IX B of the Permit (p669-670) improperly subsumes 40 C.F.R. §§ 60.7(c) and (d) under SIP-approved BAAQMD Regulation 1-522.8, and that the Statement of Basis does not sufficiently explain the basis for the shield. Petition at 28.

BAAQMD Regulation 1-522.8 requires that

Monitoring data shall be submitted on a monthly basis in a format specified by the APCO. Reports shall be submitted within 30 days of the close of the month reported on.

Sections 60.7(c) and (d) require very specific reporting requirements that are not required by BAAQMD Regulation 1-522.8. For instance, § 60.7(c)(1) requires that excess emissions reports include the magnitude of excess emissions computed in accordance with § 60.13(h) and any conversion factors used. Section 60.7(d)(1) requires, that the report form contain, among other things, the duration of excess emissions due to startup/shutdown, control equipment problems, process problems, other known causes, and unknown causes and total duration of excess emissions.

The Statement of Basis for Valero contains the following justification for the shield

40 C.F.R. Part, 60 Subpart A CMS reporting requirements are satisfied by BAAQMD 1-522.8 CEMS reporting requirements. See December 2003 Statement of Basis at 31.

EPA agrees with Petitioner that the requirements of 40 C.F.R. §§ 60.7(c) and (d) are not satisfied by BAAQMD Regulation 1-522.8, and that the Statement of Basis does not provide adequate justification for subsuming §§ 60.7(c) and (d). An adequate justification should address how the requirements of a subsumed regulation are satisfied by another regulation, not simply that the requirements are satisfied by another regulation.

For the reasons set forth above, EPA is granting the Petition on these grounds. The District must reopen the Permit to include the reporting requirements of §§ 60.7(c) and (d) or adequately explain how they are appropriately subsumed.

2. BAAQMD Regulation 11-7

Petitioner also alleges that the District incorrectly attempted to subsume the State-only requirements of BAAQMD Regulation 11-7 for valves under the requirements of SIP approved BAAQMD Regulation 8-18-404, and states that only a federal requirement may be subsumed in the permit pursuant to BAAQMD Regulation 2-6-233.2. Petition at 29.

Including a permit shield for a subsumed non-federally enforceable regulation has no regulatory significance from a federal perspective because it is not related to whether the permit assures compliance with all Clean Air Act requirements. See 40 C.F.R. 70.2 (defining “applicable requirement”); 70.1(b) (requiring that title V sources have operating permits that assure compliance with all applicable requirements). State only requirements are not subject to the requirements of title V and, therefore, are not evaluated by EPA unless their terms may either impair the effectiveness of the title V permit or hinder a permitting authority’s ability to implement or enforce the title V permit. *In the Matter of Eastman Kodak Company*, Petition No.: II-2003-02, at 37 (Feb. 18, 2005). Therefore, EPA is denying the Petition on this issue.

3. 40 C.F.R. § 60.482-7(g)

Petitioner alleges that a permit shield should not be allowed for federal regulation NSPS Subpart VV, § 60.482-7(g) based upon its being subsumed by SIP-approved BAAQMD Regulation 8-18-404 because the NSPS defines monitoring protocols for valves that are demonstrated to be unsafe to monitor, whereas Regulation 8-18-404 refers to an alternative inspection scheme for leak-free valves. Petitioner states “Because the BAAQMD regulation does not address the same issue as 40 C.F.R. § 60.482-7(g), it cannot subsume the federal requirement.” Petition at 29.

EPA disagrees with Petitioner that the two regulations address different issues. Both regulations address alternative inspection time lines for valves. Regulation 8-18-404 specifically states:

Alternative Inspection Schedule: The inspection frequency for valves may change from quarterly to annually provided all of the conditions in Subsection 404.1 and 404.2 are satisfied.

- 404.1 The valve has been operated leak free for five consecutive quarters;
- 404.2 Records are submitted and approval from the APCO is obtained.
- 404.3 The valve remains leak free. If a leak is discovered, the inspection frequency will revert back to quarterly.

NSPS Subpart VV requires valves to be monitored monthly except, pursuant to § 60.482-7(g), any valve that is designated as unsafe to monitor must only be monitored as frequently as practicable during safe-to-monitor times. In explaining the basis for the shield, the Permit states:

[60.482-7(g)] Allows relief from monthly monitoring if designated as unsafe-to-monitor. BAAQMD Regulation 8-18-404 does not allow this relief. Permit at 644.

BAAQMD is correct that the Regulation 8-18-404 is more stringent than 40 C.F.R § 60.482-7(g). Therefore, EPA is denying the Petition on this issue.

F. Throughput Limits for Grandfathered Sources

Petitioner alleges that EPA should object to the Permit to the extent that throughput limits for grandfathered sources set thresholds below which sources are not required to submit all information necessary to determine whether “new or modified construction may have occurred.” Petitioner also alleges that the thresholds are not “legally correct” and therefore are not reasonably accurate surrogates for a proper NSR baseline determination. Petitioner also argues that EPA should object to the Permit because the existence of the throughput limits, even as reporting thresholds, may create “an improper presumption of the correctness of the threshold” and discourage the District from investigating events that do not trigger the threshold or reduce penalties for NSR violations. Finally, Petitioner also requests that EPA object to the Permit because the District’s reliance on non-SIP Regulation 2-1-234.1 “in deriving these throughput limits” is improper.

The District has established throughput limits on sources that have never gone through new source review (“grandfathered sources”). The Clean Air Act does not require permitting authorities to impose such requirements. Therefore, to understand the purpose of these limits, EPA is relying on the District’s statements characterizing the reasons for, and legal implications of, these throughput limits. The District’s December 2003 CRTC makes the following points regarding throughput limits:

- The throughput limits being established for grandfathered sources will be a useful tool that enhances compliance with NSR. . . . Requiring facilities to report when throughput limits are exceeded should alert the District in a timely way to the possibility of a modification occurring.

The limits now function merely as reporting thresholds rather than as presumptive NSR triggers.

They do not create a baseline against which future increases might be measured (“NSR baseline”). Instead, they act as a presumptive indicator that the equipment has undergone an operational change (even in the absence of a physical change), because the equipment has been operated beyond designed or as-built capacity.

The throughput limits do not establish baselines; furthermore, they do not contravene NSR requirements. The baseline for a modification is determined at the time of

permit review. The proposed limits do not preclude review of a physical modification for NSR implications.

- Throughput limits on grandfathered sources are not federally enforceable.
- The [permits] have been modified to clearly distinguish between limits imposed through NSR and limits imposed on grandfathered sources.

December 1, 2003 RTC at 31-33.

EPA believes the public comments and the District's responses have done much to describe and explain, in the public record, the purpose and legal significance of the District's throughput limits for grandfathered sources. Based on these interactions, EPA has the following responses to Petitioner's allegations.

First, EPA denies the Petition as to the allegation that the thresholds set levels below which the facility need not apply for NSR permits. As the District states, the thresholds do not preclude the imposition of federal NSR requirements. EPA does not see that the throughput limits would shield the source from any requirements to provide a timely and complete application if a construction project will trigger federal NSR requirements.

Second, the Permit itself makes clear that the throughput limits are not to be used for the purpose of establishing an NSR baseline: "Exceedance of this limit does not establish a presumption that a modification has occurred, nor does compliance with the limit establish a presumption that a modification has not occurred." Permit at 4. Therefore, EPA finds no basis to object to the Permit on the ground that the thresholds are not "reasonably accurate surrogates" for an actual NSR baseline, as they clearly and expressly have no legal significance for that purpose.

Third, while EPA shares Petitioner's interest in compliance with NSR requirements, Petitioner's concern that the thresholds might discourage reliance on appropriate NSR baselines to investigate and enforce possible NSR violations is speculative and cannot be the basis of an objection to the Permit.

Fourth, EPA finds that the District's reliance on BAAQMD Regulation 2-1-234.1, which is not SIP-approved, to impose these limits is appropriate. EPA's review of the Permit, however, found a statement suggesting that the District will rely on this non-SIP approved rule to determine whether an NSR modification has occurred. EPA takes this opportunity to remind the District that its NSR permits must meet the requirements of the federally-applicable SIP. *See* CAA 172, 173; 40 C.F.R. § 51. EPA finds no basis, however, to conclude that the Permit is deficient.

G. Monitoring

The lack of monitoring raises an issue as to consistency with the requirement that each permit contain monitoring sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit where the applicable requirement does not require periodic monitoring or testing. See 40 C.F.R. § 70.6(a)(3)(i)(B). EPA has recognized, however, that there may be limited cases in which the establishment of a regular program of monitoring or recordkeeping would not significantly enhance the ability of the permit to assure compliance with an applicable requirement and where the status quo (i.e., no monitoring or recordkeeping) could meet the requirements of 40 C.F.R. § 70.6(a)(3). See, *Los Medanos*, at 16. EPA's consideration of these issues and determinations as to the adequacy of monitoring follow.

I 40 C.F.R. Part 60, Subpart J (NSPS for Petroleum Refineries)

Petitioner makes the following allegations with regard to the treatment of flares under NSPS Subpart J: (i) BAAQMD has not made a determination as to the applicability of NSPS Subpart J to three of the four flares at Valero; (ii) there is no way to tell whether flares qualify for the exemption in NSPS Subpart J because there are no requirements in the Permit to ensure that the flares are operated only in "emergencies;" (iii) the Permit must contain a federally enforceable reporting requirement to verify that each flaring event would qualify for an exemption from the H₂S limit; (iv) the Permit fails to ensure that all other NSPS Subpart J requirements are practically enforceable; and (v) federally enforceable monitoring must be imposed pursuant to 40 C.F.R. §§ 70.6(a)(3)(i)(B) and 70.6(c) and Section 504(c) of the Act to verify compliance with all applicable requirements of Subpart J. Petition at 33.

The New Source Performance Standard (NSPS) for Petroleum Refineries, 40 C.F.R. Part 60, Subpart J, prohibits the combustion of fuel gas containing H₂S in excess of 0.10 gr/dscf at any flare built or modified after June 11, 1973. This prohibition is codified in 40 C.F.R. § 60.104(a)(1). Additionally, 40 C.F.R. §§ 60.105(a)(3-4) requires the use of continuous monitors for flares subject to § 60.104(a)(1). However, the combustion of gases released as a result of emergency malfunctions, process upsets, and relief valve leakage is exempt from the H₂S limit. The draft refinery permits proposed by BAAQMD in February 2004 applied a blanket exemption from the H₂S standard and associated monitoring for about half of the Bay Area refinery flares on the basis that the flares are "not designed" to combust routine releases. The statements of basis for the refinery permits state, however, that at least some of these flares are "physically capable" of combusting routine releases. To help assure that this subset of flares would not trigger the H₂S standard, BAAQMD included a condition in the permits prohibiting the combustion of routine releases at these flares.

Following EPA comments submitted to BAAQMD in April of 2004, BAAQMD revised its approach to the NSPS Subpart J exemption. The permits proposed to EPA in August of 2004 indicate that all flares that are affected units under 60.100 are subject to the H₂S standard, except when they are used to combust process upset gases, and gases released to the flares as a result of relief valve leakages or other malfunctions. However, the permits were not revised to include the

continuous monitors required under §§ 60.105(a)(3) and (4) on the basis that the flares will always be used to combust non-routine releases and thus will never actually trigger the H₂S standard or the requirement to install monitors.

With respect to Petitioner's first allegation, BAAQMD has clearly considered applicability of NSPS Subpart J to flares, and has indicated that NSPS Subpart J applies to one, S-19. Page 16 of the December 2004 Statement of Basis states:

The Benicia Refinery has three separate flare header systems: 1) the main flare gas recovery header with flares S-18 and S-19, 2) the acid gas flare header with flare S-16, and 3) the butane flare header with flare S-17. Flares S-16 and S-18 were placed in service during the original refinery startup in 1968. Flare S-17 was placed in service with the butane tank TK-1726 in 1972. Flare S-19 was added to the main gas recovery header in 1974 to ensure adequate relief capacity for the refinery. S-19 is subject to NSPS Subpart J, because it was a fuel gas combustion device installed after June 11, 1973, the effective date of 60.100(b).

The table on page 18 of the Statement of Basis also directly states that flares S-16, S-17 and S-18 are not subject to NSPS Subpart J. While the Permit would be clearer if BAAQMD included a statement that the flares have not been modified so as to trigger the requirements of NSPS Subpart J, such a statement is not required by title V. Therefore, EPA is denying the Petition on this issue.

However, EPA agrees with Petitioner that the Permit is flawed with respect to issues (ii) and (iii) above. First, the continuous monitoring of §§ 60.105(a)(3) and (4) is not included in the Permit because, BAAQMD claims, flare S-19 is never used in a manner that would trigger the H₂S standard and the requirement to install a continuous monitor. While the Permit does contain District-enforceable only monitoring to show compliance with a federally enforceable condition prohibiting the combustion of routinely-released gases in a flare (20806, #7), there is currently no federally enforceable monitoring requirement in the Permit to demonstrate compliance with this condition or with NSPS Subpart J, both federally enforceable applicable requirements. Because NSPS Subpart J is an applicable requirement, the Permit must contain periodic monitoring pursuant to 40 C.F.R. § 70.6(a)(3)(i)(B) and BAAQMD Reg. 6-503 (BAAQMD Manual of Procedures, Vol. III, Section 4.6) to show compliance with the regulation.

Therefore, EPA is granting the Petition on the basis that the Permit does not assure compliance with NSPS Subpart J, or with federally enforceable permit condition 20806, #7. BAAQMD must reopen the Permit to either include the monitoring under sections 60.105(a)(3) or (4), or, for example, to include adequate federally enforceable monitoring to show compliance with condition 20806, #7.

With respect to issues (iv) and (v), it is unclear what other requirements Petitioner is referring to, or what monitoring Petitioner is requesting. For these reasons, EPA is denying the

Petition on these grounds.

2 Flare Opacity Monitoring

Petitioner notes that flares are subject to SIP-approved BAAQMD Regulation 6-301, which prohibits visible emissions from exceeding defined opacity limits for a period or periods aggregating more than three minutes in any hour. Petitioner alleges that the opacity limit set forth in Regulation 6-301 is not practically enforceable during short-duration flaring events because no monitoring is required for flaring events that last less than fifteen minutes and only limited monitoring is required for events lasting less than thirty minutes. Petitioner alleges that repeated violations of BAAQMD Regulation 6-301 due to short-term flaring could be an ongoing problem that evades detection.

The opacity limit in Regulation 6-301 does not contain periodic monitoring. Because the underlying applicable requirement imposes no monitoring of a periodic nature, the Permit must contain "periodic monitoring sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit" 40 C.F.R. § 70.6(a)(3)(i)(B). Thus, the issue before EPA is whether the monitoring imposed in the Permit will result in reliable and representative data from the relevant time period such that compliance with the Permit can be determined.

In this case, the District has imposed certain monitoring conditions to determine compliance with the opacity standard during flaring events. The Permit defines a "flaring event" as a flow rate of vent gas flared in any consecutive 15 minute period that continuously exceeds 330 standard cubic feet per minute (scfm). Within 15 minutes of detecting a flaring event, the facility must conduct a visible emissions check. The visible emissions check may be done by video monitoring. If the operator can determine there are no visible emissions using video monitoring, no further monitoring is required until another 30 minutes has expired. If the operator cannot determine there are no visible emissions using video monitoring, the facility must conduct either an EPA Reference Method 9 test or survey the flare according to specified criteria. If the operator conducts Method 9 testing, the facility must monitor the flare for at least 3 minutes, or until there are no visible emissions. If the operator conducts the non-Method 9 survey, the facility must cease operation of the flare if visible emissions continue for three consecutive minutes.

Although EPA agrees with Petitioner that the Permit does not require monitoring during short-duration flaring events, EPA does not believe Petitioner has demonstrated that the periodic monitoring is inadequate. For instance, Petitioner has not shown that short-duration flaring events are likely to be in violation of the opacity standard, nor has Petitioner made a showing that short-duration flaring events occur frequently or at all. Thus, Petitioner has not demonstrated that the periodic monitoring in the Permit is insufficient to detect violations of the opacity standard.

Additionally, in June 1999, a workgroup comprised of EPA, CAPCOA and CARB staff completed a set of periodic monitoring recommendations for generally applicable SIP requirements such as Regulation 6-301. The workgroup's relevant recommendation for refinery flares was a visible emissions check "as soon as an intentional or unintentional release of vent gas to a gas flare but no later than one hour from the flaring event." See CAPCOA/CARB/EPA Region IX Periodic Monitoring Memo, June 24, 1999, at 2. In comparison, the periodic monitoring contained in the Permit would appear to be both less stringent, by not requiring monitoring for up to thirty minutes of a release of gas to a flare, and more stringent, by requiring monitoring within 30 minutes rather than one hour. Therefore, EPA encourages the District to amend the Permit to require monitoring upon the release to the flare, rather than delaying monitoring as currently set forth in the Permit.

Finally, EPA notes that the Permit does not prevent the use of credible evidence to demonstrate violations of permit terms and conditions. Even if the Permit does not require visible emissions checks for short-duration flaring events, EPA, the District, and the public may use any credible evidence to bring an enforcement case against the source. 62 Fed. Reg. 8314 (Feb. 24, 1997).

For the reasons cited above, EPA is denying the Petition on this issue.

3 Cooling Tower Monitoring

Petitioner claims that the Permit lacks monitoring conditions adequate to assure that the cooling tower complies with SIP-approved District Regulations 8-2 and 6. Petitioner further alleges that the District's decisions to not require monitoring for the cooling towers is flawed due to its use of AP-42 emission factors, which may not be representative of the actual cooling tower emissions.

a. Regulation 8-2

District Regulation 8-2-301 prohibits miscellaneous operations from discharging into the atmosphere any emission that contains 15 lb per day and a concentration of more than 300 ppm total carbon. Although the underlying applicable requirement does not contain periodic monitoring requirements, the District declined to impose monitoring on source S-29 to assure compliance with the emission limit.¹⁹

The December 1, 2003 Statement of Basis sets forth the grounds for the District's decision that monitoring is not necessary to assure compliance with this applicable requirement. First, the District stated that its monitoring decisions were made by balancing a variety of factors including 1) the likelihood of a violation given the characteristics of normal operation, 2) the degree of variability in the operation and in the control device, if there is one, 3) the potential

¹⁹See Permit, Table VII - C5 Cooling Tower, pp. 541

severity of impact of an undetected violation, 4) the technical feasibility and probative value of indicator monitoring, 5) the economic feasibility of indicator monitoring, and 6) whether there is some other factor, such as a different regulatory restriction applicable to the same operation, that also provides some assurance of compliance with the limit in question. In addition, the District provided calculations that purported to quantify the emissions from the facility's cooling tower. The calculations relied upon water circulation and exhaust airflow rates supplied by the refinery in addition to two AP-42 emission factors. The District found that the calculated emissions were much lower than the regulatory limit and concluded that monitoring was not necessary. Although it is true that the results suggest there may be a large margin of compliance, the nature of the emissions and the unreliability of the data used in the calculations renders them inadequate to support a decision that no monitoring is needed over the entire life of the permit.

An AP-42 emission factor is a value that roughly correlates the quantity of a pollutant released to the atmosphere with an activity associated with the release of that pollutant. The use of these emission factors may be appropriate in some permitting applications, such as establishing operating permit fees. However, EPA has stated that AP-42 factors do not yield accurate emissions estimates for individual sources. See *In the Matter of Cargill, Inc.*, Petition IV-2003-7 (Amended Order) at 7, n.3 (Oct. 19, 2004); *In re: Peabody Western Coal Co.*, CAA Appeal No. 04-01, at 22-26 (EAB Feb. 18, 2005). Because emission factors essentially represent an average of a range of facilities and emission rates, they are not necessarily indicative of the emissions from a given source at all times; with a few exceptions, use of these factors to develop source-specific permit limits or to determine compliance with permit requirements is generally not recommended. The District's reliance on the emission factors in making its monitoring decision is therefore problematic.

Atmospheric emissions from the cooling towers include fugitive VOCs and gases that are stripped from the cooling water as the air and water come into contact. In an attempt to develop a conservative estimate of the emissions, the District used the emission factor for "uncontrolled sources." For these sources, AP-42 Table 5.1.2 estimates the release of 6 lb of VOCs per million gallons of circulated water. This emission factor carries a "D" rating, which means that it was developed from a small number of facilities, and there may be reason to suspect that the facilities do not represent a random or representative sample of the industry. In addition, this rating means that there may be evidence of variability within the source population. In this case the variability stems from the fact that 1) contaminants enter the cooling water system from leaks in heat exchangers and condensers, which are not predictable, and 2) the effectiveness of cooling tower controls is itself highly variable, depending on refinery configuration and existing maintenance practices.²⁰ It is this variability that renders the emission factor incapable of assuring continued compliance with the applicable standard over the lifetime of the permit. For all practical purposes, a single emission factor that was developed to represent long-term average emissions can not forecast the occurrence and size of leaks in a collection of heat exchangers and is therefore not predictive of compliance at any specific time.

²⁰ AP 42, Fifth Edition, Volume I, Chapter 5

EPA has previously stated that annual reporting of NOx emissions using an equation that uses current production information, along with emission factors based on prior source tests, was insufficient to assure compliance with an emission unit's annual NOx standard. Even when presented with CEMs data which showed that actual NOx emissions for each of five years were consistently well below the standard, EPA found that a large margin of compliance alone was insufficient to demonstrate that the NOx emissions would not change over the life of the permit. *See In the Matter of Fort James Camas Mill*, Petition No. X-1999-1, at 17-18, (December 22, 2000).

Consistent with its findings in regard to the Fort James Camas Mill permit, EPA finds in this instance that the District failed to demonstrate that a one-time calculation is representative of ongoing compliance with the applicable requirement, especially considering the unpredictable nature of the emissions and the unreliability of the data used in the calculations. Therefore, under the authority of 40 C.F.R. § 70.6(a)(3)(i)(B), EPA is granting Petitioner's request to object to the Permit as the request pertains to cooling tower monitoring for District Regulation 8-2-301.

As an alternative to meeting the emission limitation cited in Section 8-2-301, facilities may operate in accordance with an exemption under Section 8-2-114, which states, "emissions from cooling towers...are exempt from this Rule, provided best modern practices are used." As a result, in lieu of adding periodic monitoring requirements adequate to assure compliance with the emission limit in Section 8-2-301, the District may require the Statement of Basis to include an applicability determination with respect to Section 8-2-114 and revise the Permit to reflect the use of best modern practices.

b. Regulation 6

BAAQMD SIP-approved Regulation 6 contains four particulate matter emissions standards for which Petitioner objects to the absence of monitoring. The District's decision for each standard is discussed separately below.

(1) Regulation 6-310

BAAQMD Regulation 6-310 limits the emissions from the cooling tower to 0.15 grains per dry standard cubic foot. Appendix G of the December 1, 2003 Statement of Basis sets forth the grounds for the District's decision that monitoring is not necessary to assure compliance with this requirement. Specifically, Appendix G provides calculations for the particulate matter emissions from the cooling tower and compares the expected emission rate to the regulatory limit. In calculating the emissions, the District used the PM-10 emission factor of 0.019 lb per 1000 gal circulating water from Table 13.4-1 of AP-42. The calculations show that the emissions are expected to be approximately 180 times lower than the emission limit. As a result, the District concluded that periodic monitoring is not necessary to assure compliance with the standard.

Petitioner alleges that these calculations do not adequately justify the District's decision because the AP-42 emission factor used carries an E rating, which means that it is of poor quality. As a result, Petitioner claims it is unlikely that the calculated emissions based on this factor are representative of the actual cooling tower emissions.

Petitioner is correct that the emission factor used by the District has an E rating. However, EPA disagrees that this rating alone is sufficient to conclude that the emission factor is not representative of the emissions from the cooling towers at the refinery. PM-10 emissions from cooling towers are generated when drift droplets evaporate and leave fine particulate matter formed by crystallization of dissolved solids. Particulate matter emission estimates can be obtained by multiplying the total liquid drift factor by the total dissolved solids (TDS) fraction in the circulating water. The AP-42 emission factor used by the District is based on a drift rate of 0.02% of the circulating water flow and a TDS content of approximately 12,000 ppm. With regard to both parameters, the District indicated in the December 1, 2003 Statement of Basis that the emission factor yielded a higher estimate of the emissions than the actual drift and TDS data that was supplied by the refineries. Therefore, EPA believes that the District's reliance on this emission factor does not demonstrate a deficiency in the Permit.²¹

EPA notes that the emission factor's poor rating is due in part to the variability associated with cooling tower drift and TDS data. As discussed in the Statement of Basis, the degree to which the emissions may vary was taken into account when considering the ability of the emission factor to demonstrate compliance with the emission limit. With respect to the drift, EPA believes that the emission factor is conservatively high compared to the 0.0005% drift rate that cooling towers are capable of achieving. Where TDS are concerned, AP-42 indicates that the dissolved solids content may range from 380 ppm to 91,000 ppm. While the emission factor represents a TDS concentration at the lower end of this spectrum, increases in the TDS content do not significantly increase the grain loading due to the large exhaust air flow rates exiting the cooling towers. Even assuming that the TDS concentration reached 91,000 ppm, the calculated emissions are still approximately 22 times lower than the regulatory limit.²²

The District has provided sufficient evidence to demonstrate that the emissions will not vary by a degree that would cause an exceedance of the standard. Given the representative air flow and water circulation rates supplied by the refinery, compliance with the applicable requirement is expected under conditions (i.e., maximum TDS content) that represent a reasonable upper bound of the emissions. Therefore, EPA is denying Petitioner's request to object to the Permit as it pertains to periodic monitoring for Regulation 6-310.

²¹Although EPA stated above in the discussion for Regulation 8-2 that AP-42 emission factors are generally not recommended for use in determining compliance with emission limits, there are exceptions. Data supplied by the refineries indicates that the AP-42 emission factor for PM-10 conservatively estimates the actual cooling tower emissions; as discussed further below, compliance with the limit is expected under conditions that represent a reasonable upper bound on the emissions.

²²Again, this is assuming a drift rate of 0.02%.

(2) Regulation 6-31

BAAQMD Regulation 6-311 states that no person shall discharge particulate matter into the atmosphere at a rate in excess of that specified in Table 1 of the Rule for the corresponding process weight rate. Assuming the process weight rate for the cooling tower remains at or above the maximum level specified in Table 1, the rule establishes a maximum emission rate of 40 lb/hr. Unlike for Regulation 6-310, the District provided no justification for its decision to not require monitoring to assure compliance with this limit.

Using the PM-10 emission factor cited by the District in its calculations for Regulation 6-310, EPA estimates the emissions from S-29 to be in excess of 40 lb/hr. While the District stated that the emission factor represents a more conservative estimate of the emissions than the actual data provided by the refineries, it did not say how conservative the factor is. As a result, the District's monitoring decision is unsupported by the record and EPA finds that the Permit fails to meet the Part 70 standard that it contain periodic monitoring sufficient to yield reliable data that are representative of the source's compliance with its terms. *See* 40 C.F.R. § 70.6(a)(3)(i)(B). Therefore, EPA is granting Petitioner's request to object to the Permit. The Permit must include periodic monitoring adequate to assure compliance with BAAQMD Regulation 6-311. *See* 40 C.F.R. § 70.6(a)(3)(i)(B).

(3) Regulation 6-305

BAAQMD Regulation 6-305 states that, "a person shall not emit particles from any operation in sufficient number to cause annoyance to any other person... This Section 6-305 shall only apply if such particles fall on real property other than that of the person responsible for the emission." Nuisance requirements such as this may be enforced by EPA and the District at any time and there is no practical monitoring program that would enhance the ability of the permit to assure compliance with the applicable requirement. Therefore, EPA is denying Petitioner's request to object to the Permit as it pertains to monitoring for BAAQMD Regulation 6-305.

(4) Regulation 6-301

BAAQMD Regulation 6-301 states that a person shall not emit from any source for a period or periods aggregating more than three minutes in any hour, a visible emission which is as dark or darker than No. 1 on the Ringelmann Chart. While the Statement of Basis does not contain a justification for the District's decision that monitoring is not required for this standard, the District stated the following in response to public comments: "The District has prepared an analysis based on the AP-42 factors for particulate, which are very conservative, and has indeed determined that 'it is virtually impossible for cooling towers to exceed visible or grain loading limitations.' The calculations show that the particulate grain loading is a hundredth or less than the 0.15 gr/dscf standard due to the large airflows. When the grain loading is so low, visible emissions are not expected." 2003 CRTC at 59. EPA finds the District's assessment of the visible emissions to be reasonable and that Petitioner has not demonstrated otherwise. Therefore,

EPA is denying Petitioner's request to object to the Permit as it pertains to monitoring for BAAQMD Regulation 6-301.

4. Monitoring of Pressure Relief Valves

Petitioner alleges that the Permit must include additional monitoring to assure that all pressure relief valves at the facility are in compliance with the requirements of SIP-approved District Regulation 8-28 (Episodic Releases from Pressure Relief Valves). Petition at 36.

Regulation 8-28 requires that within 120 days of the first "release event" at a facility, the facility shall equip each pressure relief device of that source with a tamperproof tell-tale indicator that will show that a release has occurred since the last inspection. Regulation 8-28 also requires that a release event from a pressure relief device be reported to the APCO on the next working day following the venting. Petitioner states that neither the regulation nor the Permit includes any monitoring requirements to ensure that the first release event of a relief valve would ever be recorded, and that available tell-tale indicators or another objective monitoring method should be required for all pressure relief valves at the refinery, regardless of a valve's release event status.

First, EPA believes that the requirement that a facility report all release events to the District is adequate to ensure that the first release event would be recorded. EPA also notes that the refinery is subject to the title V requirement to certify compliance with all applicable requirements, including Regulation 8-28. See 40 C.F.R. § 70.6(c)(5). Thus, EPA does not have a basis to determine that the reporting requirement would not assure compliance with the applicable requirement at issue.

For the reasons stated above, EPA is denying the Petition on this issue.

5. Additional Monitoring Problems Identified by Petitioner

Petitioner claims that several sources with federally enforceable limits under BAAQMD Regulation 6 do not have monitoring adequate to assure compliance. The sources and limits at issue are discussed separately below.

Sulfur Storage Pit (S-157) / BAAQMD Regulations 6-301 and 6-310

BAAQMD Regulation 6 contains two particulate matter emissions standards for which Petitioner objects to the absence of monitoring. Specifically, BAAQMD Regulation 6-301 limits visible emissions to less than Ringelmann No. 1 and Regulation 6-310 limits the emissions to 0.15 gr. per dscf. Although Regulation 6 does not contain periodic monitoring requirements for either of the standards, the District declined to impose monitoring on this source.

The December 1, 2003 Statement of Basis provides the District's justification for not

requiring monitoring. Specifically, the District stated, "Source is capable of exceeding visible emissions or grain loading standard only during process upset. Under such circumstances, other indicators will alert the operator that something is wrong." See December 1, 2003 Statement of Basis, n. 4, at 23. If the source is not capable of exceeding the emission standards at times other than process upsets, it is reasonable that the District would not require regularly scheduled monitoring during normal operations. However, if, as stated by the District, S-157 is capable of exceeding the emission standards during process upsets, monitoring during those periods may be necessary. While the District stated that indicators would alert the operator that something is wrong in the event of a process upset, the District failed to demonstrate how the indicators or the operator's response would assure compliance with the applicable limits.

EPA finds in this case that the District's decision to not require monitoring is not adequately supported by the record. Therefore, EPA is granting Petitioner's request to object to the Permit as it pertains to monitoring for S-157. The District must re-open the Permit to include periodic monitoring that yields reliable data that are representative of the source's compliance with the permit or further explain in the Statement of Basis why monitoring is not needed.

b. Lime Slurry Tanks (S-174 and S-175) / BAAQMD Regulations 6-301, 6-310, and 6-311

BAAQMD Regulation 6 contains three standards for which Petitioner objects to the absence of monitoring. Regulation 6-311 sets a variable emission limit depending on the process weight rate and the requirements of 6-301 and 6-310 are described above. Regulation 6 does not contain periodic monitoring requirements for any of the standards and the District did not impose monitoring on these sources.

As in the previous case for source S-157, the Statement of Basis states that the District did not require monitoring to assure compliance with Regulations 6-301 and 6-310 because the "source is capable of exceeding visible emissions or grain loading standard only during process upset. Under such circumstances, other indicators will alert the operator that something is wrong." See December 1, 2003 Statement of Basis, n. 4, at 23. The Statement of Basis is silent on the District's monitoring decision for Regulation 6-311. Therefore, for the reasons stated above, EPA is granting Petitioner's request to object to the Permit as it pertains to monitoring for sources S-174 and S-175 to assure compliance with Regulations 6-301, 6-310, and 6-311. The District must reopen the Permit to include periodic monitoring or further explain in the Statement of Basis why monitoring is not needed.

c. Diesel Backup Generators (S-240, S-241, and S-242) / BAAQMD Regulations 6-303.1 and 6-310

BAAQMD Regulation 6 contains two particulate matter emissions standards for which Petitioner objects to the absence of monitoring. The requirement of Regulation 6-310 is described above and Regulation 6-303.1 limits visible emissions to Ringelmann No. 2.

Regulation 6 does not contain periodic monitoring requirements for any of the standards and the District did not impose monitoring on these sources.

As a preliminary matter, EPA notes that opacity monitoring is generally not necessary for California sources firing on diesel fuel, based on the consideration that sources in California usually combust low-sulfur fuel.²¹ Therefore, EPA is denying Petitioner's request to object to the Permit as it pertains to monitoring for Regulation 6-303.1.

With regard to Regulation 6-310, the December 1, 2003 Statement of Basis sets forth the basis for the District's decision that monitoring is not necessary. Specifically, the District states, "No monitoring [is] required because this source will be used for emergencies and reliability testing only." While it is true that Condition 18748 states these engines may only be operated to mitigate emergency conditions or for reliability-related activities (not to exceed 100 hours per year per engine), this condition is not federally enforceable. Absent federally enforceable restrictions on the hours of operation, the District's decision not to require monitoring is not adequately supported. Therefore, EPA is granting Petitioner's request to object to the Permit as it pertains to Regulation 6-310. The District must reopen the Permit to add periodic monitoring to assure compliance with the applicable requirement or further explain in the statement of basis why it is not necessary.

d. FCCU Catalyst Regenerator (S-5) and Fluid Coker (S-6) /
BAAQMD Regulation 6-305

BAAQMD Regulation 6 contains one particulate matter emission standard for which Petitioner objects to the absence of monitoring. Regulation 6 does not contain periodic monitoring requirements for any of the standards and the District did not impose monitoring on these sources.

BAAQMD Regulation 6-305 states that, "a person shall not emit particles from any operation in sufficient number to cause annoyance to any other person. . . This Section 6-305 shall only apply if such particles fall on real property other than that of the person responsible for the emission." Petitioner has failed to establish that there is any practical monitoring program that would enhance the ability of the permit to assure compliance with the applicable requirement. Therefore, EPA is denying Petitioner's request to object to the Permit as it pertains to monitoring for BAAQMD Regulation 6-305.

e. Coke Transport, Catalyst Unloading, Carbon Black Storage, and
Lime Silo (S-8, S-10, S-11, and S-12) / BAAQMD Regulation 6-
311.

²¹Per CAPCOA/CARB/EPA Region IX agreement. See *Approval of Title V Periodic Monitoring Recommendations*, June 24, 1999.

BAAQMD Regulation 6 contains one particulate matter emission standard for which Petitioner objects to the absence of monitoring. Specifically, BAAQMD Regulation 6-311 sets a variable emission limit depending on the process weight rate. Regulation 6 does not contain periodic monitoring requirements for any of the standards and the District did not impose monitoring on these sources.

For all four emission sources, the Permit requires monitoring with respect to Regulations 6-301 and 6-310 but not 6-311. Given this apparent conflict and the failure of the Statement of Basis to discuss the absence of monitoring, EPA finds that the District's decision in this case is not adequately supported by the record. Therefore, EPA is granting Petitioner's request as it pertains to monitoring for sources S-8, S-10, S-11, and S-12. The District must reopen the Permit to include periodic monitoring for Regulation 6-311 that yields reliable data that are representative of the source's compliance with the permit or explain in the Statement of Basis why monitoring is not needed.

H. Miscellaneous Permit Deficiencies

1 Missing Federal Requirements for Flares (Subpart CC)

Petitioner states that the District incorrectly determined that Valero flares are categorically exempt from 40 C.F.R. § 63 Subpart CC (NESHAP for Petroleum Refineries). Petitioner further states that "EPA disagreed with the District's claim that the flares qualify for a categorical exemption from Subpart CC when used as an alternative to the fuel gas system," and that the Valero Permit and Statement of Basis contain incorrect applicability determinations for flares S-18 and S-19, and that there is not enough information to determine applicability for flares S-16 and S-17. Petitioner states that for all flares subject to Subpart CC, the Permit must include all applicable requirements, including 40 C.F.R. § 63 Subpart A, by reference from 40 C.F.R. § 63 Subpart CC. Petitioner goes on to note that Petitioner has requested in past comments that the District determine the potential applicability of a number of federal regulations to the Valero flares, including 40 C.F.R. § 63 Subpart A, 40 C.F.R. § 63 Subpart CC, and 40 C.F.R. § 60 Subpart A, but that the District did not do so. Petitioner notes that given a lack of relevant information, Petitioner was unable to make an independent evaluation of applicability. Petitioner also alleges that EPA agreed with Petitioner that the District failed to provide sufficient information for the applicability determinations for flares S-16 and S-70 via Attachment 2 of EPA's October 8 comment letter. Finally, Petitioner states that EPA must object to the Permit until the District provides a sufficient analysis regarding the applicability of these federal rules to the Valero flares, and until the Permit contains all applicable requirements.

a. 40 C.F.R. Part 60, Subpart A

EPA finds that the applicability of 40 C.F.R. § 60 Subpart A is adequately addressed in the December 16, 2004 Statement of Basis for Valero. *See* Statement of Basis at 18 (Dec. 16, 2004). The District has included a table on page 18 of the December 16, 2004 Statement of Basis

indicating applicability of NSPS Subpart A to each of Valero's flares. Therefore, EPA is denying the Petition on this issue.

b. 40 C.F.R. Part 63, Subparts A and CC

40 C.F.R. Part 63, Subpart CC contains the Maximum Achievable Control Technology ("MACT") requirements for petroleum refineries. Under Subpart CC, the owner or operator of a Group 1 miscellaneous process vent, as defined in § 63.641, must reduce emissions of Hazardous Air Pollutants either by using a flare that meets the requirements of section 63.11 or by using another control device to reduce emissions by 98% or to a concentration of 20 ppbv. 40 C.F.R. § 63.643(a)(1). If a flare is used, a device capable of detecting the presence of a pilot flame is required. 40 C.F.R. § 63.644(a)(2).

The applicability provisions of Subpart CC are set forth in section 63.640, "Applicability and designation of affected source." Section 63.640(a) provides that Subpart CC applies to petroleum refining process units and related emissions points. The Applicability section further provides that affected sources subject to Subpart CC include emission points that are "miscellaneous process vents." 40 C.F.R. § 63.640(c)(1). The Applicability section also provides that affected sources do not include emission points that are routed to a fuel gas system. 40 C.F.R. § 63.640(d)(5). Gaseous streams routed to a fuel gas system are specifically excluded from the definition of "miscellaneous process vent," as are "episodic or nonroutine releases such as those associated with startup, shutdown, malfunction, maintenance, depressuring, and catalyst transfer operations." 40 C.F.R. § 63.641.

The District's Statement of Basis indicates that flares S-18 and S-19 are not subject to MACT Subpart CC pursuant to the exemption set forth in 40 C.F.R. § 63.640(d)(5). See December 16, 2004 Statement of Basis at 18. In the BAAQMD February 15, 2005 Letter, BAAQMD again asserted section 63.640(d)(5) as a basis for finding that the refinery's flares are not required to meet the standards in Subpart CC. EPA continues to believe that a detailed analysis of the configuration of the flare and compressor is required to exempt a flare on the basis that it is part of the fuel gas system.

BAAQMD's February 15, 2005 letter also provides an alternative rationale that gases vented to the refinery's flares are not within the definition of "miscellaneous process vents." Specifically, BAAQMD asserts that the flares are not miscellaneous process vents because they are used only to control "episodic and nonroutine" releases. As BAAQMD states:

At all of the affected refineries, process gas collected by the gas recovery system are routed to flares only under two circumstances: (1) situations in which, due to process upset or equipment malfunctions, the gas pressure in the flare header rises to a level that breaks the water seal leading to the flares; or (2) situations in which, during process startups, shutdown, malfunction, maintenance, depressuring [sic], and catalyst transfer operations are, by definition, not miscellaneous process vents, and are not subject to

Subpart CC

EPA agrees that a flare used only under the two circumstances described by the District would not be subject to Subpart CC because such flares are not used to control miscellaneous process vents as that term is defined in § 63.541. According to the BAAQMD February 15, 2003 Letter, BAAQMD intends to revise the Statement of Basis to further explain its rationale that Subpart CC does not apply to the Bay Area refinery flares, and intends to solicit public comment on its rationale.

Because the Permit and the Statement of Basis for Valero's flares S-18 and S-19 contain contradictory information with regard to the use of these flares, EPA agrees with Petitioner that the Statement of Basis is lacking a sufficient analysis regarding the applicability of MACT CC to these flares. Therefore, EPA is granting the Petition on this issue. BAAQMD must reopen the Permit to address applicability in the Statement of Basis, and, if necessary, to include the flare requirements of MACT Subpart CC in the Permit.

2 Basis for Tank Exemptions

Petitioner claims that the statement of basis and the Permit lack adequate information to support the proposed exempt status for numerous tanks identified in Table IIB of the Permit.

Table IIB of the Permit contains a list of 43 emission sources that have applicable requirements in Section IV of the Permit but that were determined by the District to be exempt from BAAQMD Regulation 2, which specifies the requirements for Authorities to Construct and Permits to Operate. Rule 1 of the regulation contains numerous exemptions that are based on a variety of physical and circumstantial grounds. EPA agrees with Petitioner that the Permit itself contains insufficient information to determine the basis for the exempt status of the equipment with respect to the exemptions in the rule. However, for most of the sources in Table IIB, Petitioner's claim that the Statement of Basis lacks the information is factually incorrect. Petitioner is referred to pages 94-99 of the Statement of Basis that accompanied the Permit issued by the District on December 1, 2003. Nonetheless, EPA is granting Petitioner's request on a limited basis for the reasons set forth below.

EPA's regulations state that the permitting authority must provide the Agency with a statement of basis that sets forth the legal and factual basis for the permit conditions. 40 C.F.R. § 70.7(a)(5). EPA has provided guidance on the content of an adequate statement of basis in a letter dated December 20, 2001, from Region V to the State of Ohio²⁴ and in a Notice of Deficiency (NOD) issued to the State of Texas.²⁵ These documents describe several key elements of a statement of basis, specifically noting that a statement of basis should address any

²⁴ The letter is available at: <http://www.epa.gov/rgv/rgmj/programs/artd/aic/state5/memoa/shguide.pdf>.

²⁵ 67 Fed. Reg. 732 (January 7, 2002).

federal regulatory applicability determinations. The Region V letter also recommends the inclusion of topical discussions on issues including but not limited to the basis for exemptions. Further, in response to a petition filed in regard to the title V permit for the Los Medanos Energy Center, EPA concluded that a statement of basis should document the decision-making that went into the development of the title V permit and provide the permitting authority, the public, and EPA with a record of the applicability and technical issues surrounding the issuance of the permit. Such a record ought to contain a description of the origin or basis for each permit condition or exemption. *See, Los Medanos*, at 10.

As stated in *Los Medanos*, the failure of a permitting authority to meet the procedural requirement to provide a statement of basis does not necessarily demonstrate that the title V permit is substantively flawed. In reviewing a petition to object to a title V permit because of an alleged failure of the permitting authority to meet all procedural requirements in issuing the permit, EPA considers whether the petitioner has demonstrated that the permitting authority's failure resulted in, or may have resulted in, a deficiency in the content of the permit. *See* CAA § 505(b)(2) (objection required "if the petitioner demonstrates . . . that the permit is not in compliance with the requirements of this Act, including the requirements of the applicable [SIP]"); *see also* 40 C.F.R. § 70.8(c)(1). Thus, where the record as a whole supports the terms and conditions of the permit, flaws in the statement of basis generally will not result in an objection. *See e.g., Doe Run*, at 24-25. In contrast, where flaws in the statement of basis resulted in, or may have resulted in, deficiencies in the title V permit, EPA will object to the issuance of the permit.

With regard to the Valero Permit, the majority of the sources listed in Table IIB are identified in the December 1, 2003 Statement of Basis along with a citation from Regulation 2 describing the basis of the exemption. For the sources that fall within this category, EPA finds that the permit record supports the District's determination for the exempt status of the equipment. However, in reviewing the December 16, 2004 Statement of Basis, EPA noted that three of the sources listed in Table IIB of the Permit are not included in the statement of basis with the corresponding citations for the exemptions.²⁶ For these sources, the failure of the record to support the terms of the Permit is adequate grounds for objecting to the Permit. Therefore, EPA is granting Petitioner's request to object to the Permit with respect to the listing of exempt sources in Table IIB but only as the request pertains to the three sources identified herein. Although EPA is not aware of other errors, the District should review the circumstances for all of the sources in Table IIB and the corresponding table in the statement of basis to further ensure that the Permit is accurate and that the record adequately supports the Permit. EPA also encourages the District to add the citation for each exemption to Table IIB as was done for the ConocoPhillips, Chevron, and Shell permits.

3 Public Participation

²⁶Compare Table IIB of the Permit with the December 1, 2003 statement of basis for the LPG Truck Loading Rack, the TK-2710 Fresh Acid Tank, and the Cogeneration Plant Cooling Tower.

Petitioner argues that the District did not, in a timely fashion, make readily available to the public, compliance information that is relevant to evaluating whether a schedule of compliance is necessary. Specifically, Petitioner asserts that it had to make several requests under the California Public Records Act to obtain "relevant information concerning NOVs issued to the facility between 2001 and 2004" and the "2003 Annual Report and other compliance information, which is not readily available." Petitioner states that it took three weeks for the District to produce the information requested in Petitioner's "2003 PRA request." Petitioner contends that it expended significant resources to obtain the data and received the data so late in the process that they could not be sufficiently analyzed.

In determining whether an objection is warranted for alleged flaws in the procedures leading up to permit issuance, such as Petitioner's claims here that the District failed to comply with public participation requirements, EPA considers whether the petitioner has demonstrated that the alleged flaws resulted in, or may have resulted in, a deficiency in the permit's content. See CAA, Section 505(b)(2)(objection required "if the petitioner demonstrates ... that the permit is not in compliance with the requirements of [the Act], including the requirements of the applicable [SIP].") EPA's title V regulations specifically identify the failure of a permitting authority to process a permit in accordance with procedures approved to meet the public participation provisions of 40 C.F.R. § 70.7(h) as grounds for an objection. 40 C.F.R. § 70.8(c)(3)(iii). District Regulations 2-6-412 and 2-6-419 implement the public participation requirements of 40 C.F.R. § 70.7(h). District Regulation 2-6-412, *Public Participation, Major Facility Review Permit Issuance*, approved by EPA as meeting the public participation provisions of 40 C.F.R. § 70.7(h), provides for notice and comment procedures that the District must follow when proposing to issue any major facility review permit. The public notice, which shall be published in a major newspaper in the area where the facility is located, shall identify, *inter alia*, information regarding the operation to be permitted, any proposed change in emissions, and a District source for further information. District Regulation 2-6-419, *Availability of Information*, requires the contents of the permit applications, compliance plans, emissions or compliance monitoring reports, and compliance certification reports to be available to the public, except for information entitled to confidential treatment.

Petitioner fails to demonstrate that the District did not process the permit in accordance with public participation requirements. The District duly published a notice regarding the proposed initial issuance of the permit. The notice, *inter alia*, referenced a contact for further information. The permit application, compliance plan, emissions or compliance monitoring reports, and compliance certification reports are available to the public through the District's Web site or in the District's files, which are open to the public during business hours. Petitioner admits that it ultimately obtained the compliance information it sought, albeit later than it wished. Petitioner fails to show that the perceived delay in receiving requested documents resulted in, or may have resulted in, a deficiency in the Permit. Therefore, EPA denies the Petition on this issue.

IV TREATMENT, IN THE ALTERNATIVE, AS A PETITION TO REOPEN

As explained in the Procedural Background section of this Order, EPA received and dismissed a prior petition ("2003 OCE Petition") from this Petitioner on a previous version of the Permit at issue in this Petition. EPA's response in this Order to issues raised in this Petition that were also included in the 2003 OCE Petition also constitutes the Agency's response to the 2003 Petition. Furthermore, EPA considers the Petition validly submitted under CAA section 505(b)(2). However, if the Petition should be deemed to be invalid under that provision, EPA also considers, in the alternative, the Petition and Order to be a Petition to Reopen the Permit and a response to a Petition to Reopen the Permit, respectively.

V CONCLUSION

For the reasons set forth above, and pursuant to section 505(b)(2) of the Clean Air Act, I deny in part and grant in part OCE's Petition requesting that the Administrator object to the Valero Permit. This decision is based on a thorough review of the draft permit, the final Permit issued December 16, 2004, and other documents pertaining to the issuance of the Permit.

MAR 15 2005

Date


Stephen L. Johnson
Acting Administrator

BEFORE THE ADMINISTRATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

IN THE MATTER OF)
ONYX ENVIRONMENTAL SERVICES)

Petition number V-2005-1
CAAPP No. 163121AAP
Proposed by the Illinois
Environmental Protection Agency

) ORDER RESPONDING TO
) PETITIONERS' REQUEST THAT
) THE ADMINISTRATOR OBJECT
) TO ISSUANCE OF A STATE
) OPERATING PERMIT
)

ORDER AMENDING PRIOR ORDER PARTIALLY DENYING AND
PARTIALLY GRANTING PETITION FOR OBJECTION TO PERMIT

EPA has become aware of a factual error in the February 1, 2006 Order Responding to Petitioners' Request that the Administrator Object to Issuance of a proposed State Operating Permit for Onyx Environmental Services. To correct that error, I am amending the February 1, 2006 Order by striking out the section entitled "VI. Monitoring" and replacing it with the language appearing below. As a result of the correction, I am hereby granting the petition on that issue.

The amended language for section VI is as follows:

VI. Monitoring

The Petitioners argue that the Administrator must object to the proposed Onyx permit because it fails to include conditions that meet the legal requirements for monitoring. The Petitioners cite condition 7.1.8.b.ii. on page 56 of the proposed Onyx permit, which provides that Onyx must install, calibrate, maintain, and operate Particulate Matter Continuous Emission Monitors (PM CEMs) to demonstrate compliance. Petitioners note that the next clause provides that the permittee need not comply with the requirement to "install, calibrate, maintain, and operate the PM CEMs until such time that U.S. EPA promulgates all performance specifications and operational requirements for PM CEMs." Petitioners argue that there are no PM monitoring requirements established in the permit without the obligation to install and operate the PM CEMs, which is contingent on future U.S. EPA action. Petition at 18.

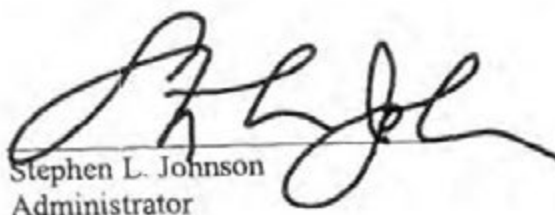
U.S. EPA promulgated the performance specification for PM CEMs (Performance Standard 11) on January 12, 2004. However, U.S. EPA has not yet promulgated the operational requirements for PM CEMs. Accordingly, the requirement to install and operate PM CEMs does not currently apply to Onyx, although the permit properly requires PM CEMs once U.S. EPA promulgates such operational requirements. However, subpart EEE contains other

requirements intended to help assure compliance with the PM limits, including a requirement for bag leak detection monitoring.⁶ The Onyx facility is equipped with baghouses, and therefore Onyx is required to operate and maintain a system to detect leaks from the baghouses, but the permit currently lacks provisions requiring a leak detection system. Accordingly, the lack of a currently applicable requirement to operate and maintain PM CEMs does not make the permit deficient under 40 C.F.R. 70.6(a)(3)(i)(B), but Petitioners are correct that the permit lacks monitoring required under other provisions of 40 C.F.R. §70.6, and therefore I am granting the petition on this issue and directing IEPA to revise the permit to incorporate all PM monitoring required for the facility under subpart EEE, including a leak detection system.⁷

I am not revising the Order issued February 1 in any other way and its provisions, other than section VI, remain undisturbed and in effect.

AUG -9 2006

Dated: _____


Stephen L. Johnson
Administrator

⁶ See Final Technical Support Document for HWC MACT Standards, Vol. IV: Compliance with the HWC MACT Standards (July 1999).

⁷ Subpart EEE has been amended since the permit was proposed by IEPA, although the requirement for bag leak detection applied to the Onyx facility at the time the permit was proposed. In re-proposing the permit, IEPA should ensure that the permit properly reflects all of the current MACT requirements



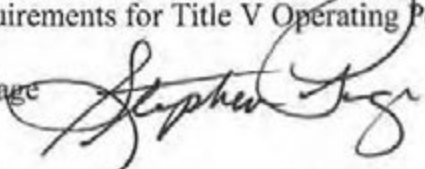
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

APR 30 2014

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

MEMORANDUM

SUBJECT: Implementation Guidance on Annual Compliance Certification Reporting and Statement of Basis Requirements for Title V Operating Permits

FROM: Stephen D. Page
Director 

TO: Regional Air Division Directors, Regions 1-10

This memorandum and attachments provide guidance on satisfying the Clean Air Act title V annual compliance certification reporting and statement of basis requirements. It addresses two outstanding recommendations made by the Office of Inspector General (OIG) in the report titled, "Substantial Changes Needed in Implementation and Oversight of Title V Permits if Program Goals are to be Fully Realized," (OIG Report No. 2005-P-00010):

Recommendation 2-1: Develop and issue guidance or rulemaking on annual compliance certification content, which requires responsible officials to certify compliance with all applicable terms and conditions of the permit, as appropriate.

Recommendation 2-3: Develop nationwide guidance on the contents of the statement of basis which includes discussions of monitoring, operational requirements, regulatory applicability determinations, explanation of any conditions from previously issued permits that are not being transferred to the title V permit, discussion of streamlining requirements, and other factual information, where advisable, including a list of prior title V permits issued to the same applicant at the plant, attainment status, and construction, permitting, and compliance history of the plant.

In a February 8, 2013, memorandum to the OIG, the EPA stated its intent to address these two recommendations, as well as similar recommendations from the Clean Air Act Advisory Committee's Title V Task Force (see "Final Report to the Clean Air Act Advisory Committee: Title V Implementation Experience," April 2006).

The attachments below provide non-binding guidance that responds to OIG recommendations regarding annual compliance certification and statement of basis. The attachments highlight existing statutory and regulatory requirements and guidance issued by the EPA, and state and local permitting authorities. In addition, the attachments highlight key components of the applicable legal requirements and clarifications responsive to certain OIG recommendations. As you are aware, this information was developed in collaboration with EPA regional offices. Note that state and local permitting authorities

also provide guidance on title V requirements; the EPA encourages sources to consult with their state and local permitting authorities to obtain additional information or to obtain specific guidance.

If you have any questions, please contact Juan Santiago, Associate Director, Air Quality Policy Division/OAQPS, at (919) 541-1084, santiago.juan@epa.gov.

Attachments

Disclaimer

These documents explain the requirements of the EPA regulations, describes the EPA policies, and recommends procedures for sources and permitting authorities to use to ensure that the annual compliance certification and the statement of basis are consistent with applicable regulations. These documents are not a rule or regulation, and the guidance they contain may not apply to a particular situation based upon the individual facts and circumstances. The guidance does not change or substitute for any law, regulation, or any other legally binding requirement and is not legally enforceable. The use of non-mandatory language such as "guidance," "recommend," "may," "should," and "can," is intended to describe the EPA policies and recommendations. Mandatory terminology such as "must" and "required" is intended to describe controlling requirements under the terms of the Clean Air Act and the EPA regulations, but the documents do not establish legally binding requirements in and of themselves.

Attachment 1

Implementation Guidance on Annual Compliance Certification Requirements Under the Clean Air Act Title V Operating Permits Program

I. Overview of Title V and Annual Compliance Certification Requirements

Title V of the Clean Air Act (CAA or Act) establishes an operating permits program for major sources of air pollutants, as well as other sources. CAA sections 501-507; 42 U.S.C. Sections 7661-7661f. A detailed history and description of title V of the CAA is available in the preamble discussions of both the proposed and final original regulations implementing title V – the first promulgation of 40 CFR Part 70. *See* 57 FR 32250 (July 21, 1992) (Final Rule); 56 FR 21712 (May 10, 1991) (Proposed Rule). The EPA recently provided further information regarding compliance certification history in a proposed rulemaking titled, “Amendments to Compliance Certification Content Requirements for State and Federal Operating Permits Programs,” published on March 29, 2013. 78 FR 19164. Under title V, states are required to develop and implement title V permitting programs in conformance with program requirements promulgated by the EPA in 40 CFR Part 70. Title V requires that every major stationary source (and certain other sources) apply for and operate pursuant to an operating permit. CAA section 502(a) and 503. The operating permit must contain conditions that assure compliance with all of the sources’ applicable requirements under the CAA. CAA section 504(a). Title V also states, among other requirements, that sources certify compliance with the applicable requirements of their permits no less frequently than annually (CAA section 503(b)(2)), provides authority to the EPA to prescribe procedures for determining compliance and for monitoring and analysis of pollutants regulated under the CAA (CAA section 504(b)), and requires each permit to “set forth inspection, entry, monitoring, compliance certification, and reporting requirements to assure compliance with the permit terms and conditions.” (CAA section 504(c).)

This guidance document focuses on the annual compliance certification, which applies to the terms and conditions of issued operating permits. CAA section 503(b)(2) states that the EPA’s regulations implementing title V “shall further require the permittee to periodically (but no less frequently than annually) certify that the facility is in compliance with any applicable requirements of the permit, and to promptly report any deviations from permit requirements to the permitting authority.” CAA section 504(c) states that each title V permit issued “shall set forth inspection, entry, monitoring, compliance certification, and reporting requirements to assure compliance with the permit terms and conditions. . . . Any report required to be submitted by a permit issued to a corporation under this subchapter shall be signed by a responsible corporate official, who shall certify its accuracy.” Additional requirements of compliance certification are described in section 114(a)(3) of the CAA as follows:

The Administrator shall in the case of any person which is the owner or operator of a major stationary source, and may, in the case of any other person, require enhanced monitoring and submission of compliance certifications. Compliance certifications shall include (A) identification of the applicable requirement that is the basis of the certification, (B) the method used for determining the compliance

status of the source, (C) the compliance status, (D) whether compliance is continuous or intermittent, (E) such other facts as the Administrator may require. Compliance certifications and monitoring data shall be subject to subsection (c) of this section [availability of information to the public].

CAA section 114(a)(3), 42 U.S.C. section 7414(a)(3). The EPA promulgated regulations implementing these provisions for title V operating permits purposes. Key regulatory provisions regarding compliance certifications are found in 40 CFR section 70.6(c), "Compliance requirements."

II. Overview of Annual Compliance Certification Requirements

The EPA's regulations at 40 CFR section 70.6(c) describe the required elements of annual compliance certifications. Specifically, 40 CFR section 70.6(c)(5)(iii)-(iv) provides that all permits must include the following annual compliance certification requirements:

(iii) A requirement that the compliance certification include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

(A) The identification of each term or condition of the permit that is the basis of the certification;

(B) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required under paragraph (a)(3) of this section;

(C) The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in paragraph (c)(5)(iii)(B) of this section. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under part 64 of this chapter occurred; and

(D) Such other facts as the permitting authority may require to determine the compliance status of the source.

(iv) A requirement that all compliance certifications be submitted to the Administrator as well as to the permitting authority.

(6) Such other provisions as the permitting authority may require.

Further information surrounding compliance certification is described in the regulatory provision addressing the criteria for a permit application, 40 CFR section 70.5(d). There have been revisions to Part 70 since its original promulgation in 1992.

One rulemaking action relevant to compliance certifications was in response to an October 29, 1999, remand from the United States Court of Appeals for the District of Columbia Circuit in *Natural Resources Defense Council (NRDC) v. EPA*, 194 F.3d 130 (D.C. Cir. 1999). In that case, the Court upheld a portion of the EPA's compliance assurance monitoring rule, but remanded back to the EPA the need to ensure 40 CFR sections 70.6(c)(5)(iii) and 71.6(c)(5)(iii) were consistent with language in CAA section 114(a)(3) which states that compliance certifications shall include, among other requirements, "whether compliance is continuous or intermittent." *NRDC* at 135 (internal citations omitted). Accordingly, the EPA proposed to add appropriate language to paragraph (c)(5)(iii)(C) of both 40 CFR sections 70.6 and 71.6. However, the final rule on June 27, 2003 (68 FR 38518) inadvertently deleted an existing sentence from the regulations (which was not related to the addition which resulted from the D.C. Circuit decision). The OIG Report referenced this issue and in response to the OIG, as agreed, the EPA has proposed to restore the inadvertently deleted sentence back into the rule. *See, e.g.*, 78 FR 19164 (March 29, 2013). This proposed rule would reinstate the inadvertently removed sentence – which, consistent with the Credible Evidence rule, requires owners and operators of sources to "identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information" – in its original place before the semicolon at the end of 40 CFR sections 70.6(c)(5)(iii)(B) and 71.6(c)(5)(iii)(B). The EPA is still reviewing comments received on this proposal; however, today's guidance document is based on statutory and long-standing regulatory requirements regarding compliance certifications, obligations for "reasonable inquiry" and consideration of credible evidence, many of which were also relied upon in the EPA's proposal.

III. Implementation of the Annual Compliance Certification Requirements

The statutory and regulatory provisions regarding compliance certification provide direction to sources and permitting authorities regarding implementation of these provisions. Nonetheless, questions arise periodically and, as a general matter, responding to those questions typically occurs on a case-by-case basis, consistent with the statutory and regulatory requirements, as well as applicable state or local regulations. Questions may be posed to authorized permitting authorities, EPA Regional Offices, or EPA Headquarters offices. As a general matter, where formal responses are provided by EPA, such responses may be searched and viewed on various websites. These include, among others:

- <http://www.epa.gov/ttn/oarpg/t5pgm.html>
- Environmental Appeals Board (EAB) decisions on PSD permitting
[http://yosemite.epa.gov/oa/EAB_Web_Docket.nsf/PSD+Permit+Appeals+\(CAA\)?OpenView](http://yosemite.epa.gov/oa/EAB_Web_Docket.nsf/PSD+Permit+Appeals+(CAA)?OpenView)
- Environmental Appeals Board (EAB) decisions on title V permitting
http://yosemite.epa.gov/oa/EAB_Web_Docket.nsf/Title+V+Permit+Appeals?OpenView

- The EPA's online searchable database of many PSD and title V guidance documents issued by EPA headquarters offices and EPA Regions (operated by Region 7) <http://www.epa.gov/region07/air/policy/search.htm>.
- The EPA's online searchable database of CAA title V petitions and issued orders (operated by Region 7) <http://www.epa.gov/region7/air/title5/petitiondb/petitiondb.htm>.¹

A review of these databases indicates that there are a number of issues that arise with some regularity and those general questions and responses are addressed below. In addition, the EPA notes that state and local permitting authorities are also a source of guidance on compliance certification form, instructions, and content. In some circumstances, state and local permitting authorities may require additional content for the annual compliance certification. *See, e.g.*, 40 CFR sections 70.6(c)(5)(iii)(D) and (c)(6). As a result, sources should review such requirements prior to completing the annual compliance certification.

A. Level of Specificity in Describing the Permit Term or Condition

The CAA and the EPA's regulations require that the annual compliance certification identify the terms and conditions that are the subject of the certification. As a general matter, specificity ensures that the responsible official has in fact reviewed each term and condition, as well as considered all appropriate information as part of the certification.² This does not mean, however, that each and every permit term and condition needs to be spelled out in its entirety in the annual compliance certification or that the certification needs to resemble a checklist of each permit term and condition. While some sources (and states) use what is informally referred to as a "long form" for certifications (where each term or condition is typically individually identified), such forms are not expressly required by either the CAA or the EPA's regulations, even though it may be advisable to use such a form.

The certification should include sufficient specificity and must identify the terms and conditions that are being covered by the certification. 40 CFR section 70.6(c)(5)(iii)(A)-(D). As a "best practice," sources may include additional information where there are unique or complex permit conditions such that "compliance" with a particular term and condition is predicated on several elements. In that case, additional information in the annual compliance certification may be advisable to explain how compliance with a particular condition was determined and, thus, the basis for the certification of compliance.

Consistent with the EPA's regulations, the annual compliance certification must include "[t]he identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period." 40 CFR section 70.6(c)(5)(iii)(B). For example, there may be situations where certification is based on electronic

¹ The EPA's practice is to publish a notice in the *Federal Register* announcing that a petition order was signed. Once signed, the EPA's practice is to place a copy of that final order on the title V petition order database, which is searchable online.

² The EPA's regulations require that a "responsible official" sign the compliance certification. The term "responsible official" is defined in 40 CFR section 70.2.

data from continuous emissions monitoring devices, which may result in a fairly straightforward annual compliance certification. Alternatively, there may be situations where compliance during the reporting period was determined through parametric monitoring, which requires the source to consider various data and perform a mathematical calculation, to determine the compliance status. In that latter situation when various data from parametric monitoring are combined via calculation, the annual compliance certification may contain more detail regarding that term or condition which relies on parametric monitoring in the permit.³

Regardless of the level of specificity provided for the particular terms and conditions in the annual certification itself, the minimum regulatory requirements include “[t]he identification of each term or condition of the permit that is the basis of the certification.” 40 CFR Section 70.6(c)(5)(iii)(A). As noted above, there may be different ways to meet this requirement. For example, when referencing a permit term or condition in the certification, if the permit incorporates by reference a citation without explaining the particular term or condition, the source may choose to provide additional clarity in the compliance certification to support the certification. Another situation where additional specificity may be advisable is where a source has an alternative operating scenario where the source may be best served by providing additional compliance related information in support of the certification. As another example, the part 71 federal operating permits program administered by the EPA includes a form, and instructions, for sources to use for their annual compliance certifications. Annual Compliance Certification (A-COMP), EPA Form 5900-04, at page 4, available at: <http://www.epa.gov/airquality/permits/pdfs/a-comp.pdf>. This form is not expressly required for non-EPA permitting authorities; however, this form and the instructions provide feedback regarding what to include in an annual compliance certification.

Importantly, permitting authorities have additional compliance certification requirements and/or recommendations that sources should consult before finalizing a compliance certification in order to ensure compliance with the applicable requirements. *See, e.g.*, 40 CFR section 70.6(c)(6).

B. Form of the Certification

As a general matter, there is no requirement in the Act or in Part 70 that a source use a specific form for the compliance certification (although some states have adopted specific forms and instructions). The most relevant consideration in certifications is not the form, but the content and clarity of the terms and conditions with which the compliance status is being certified. Some state permitting authorities have developed template forms and instructions to assist sources in ensuring compliance with applicable requirements. The EPA has not provided such templates, except as noted above where a form is provided for the EPA’s part 71 permit program. While templates are not required by the statute or the regulations, they can be useful tools (e.g., to facilitate electronic reporting and consistency) so long as sources consider whether the form adequately covers their permitting and certification situation, and the sources are able to make adjustments where appropriate to ensure compliance. The type of form used should be

³ The CAA and the EPA’s regulations require other more frequent compliance reports in addition to the annual compliance certification. In some circumstances, it may be helpful for a source to reference another compliance report in the annual compliance certification, as appropriate.

considered in light of the regulatory requirement to certify compliance with the specific terms and conditions of the permit. 40 CFR section 70.6(c)(5)(iii)(C). Additionally, as was noted earlier, because approved state and local areas may require additional elements in the annual compliance certifications, sources should confirm that their form is consistent with applicable state and local permitting requirements.

C. Certification Language

The EPA's regulations at 40 CFR section 70.5(d) require that the annual compliance certification include the following language: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this certification are true, accurate, and complete." (Emphasis added.) While the EPA appreciates that each permit includes specific monitoring requirements, additional data may be available that indicate compliance (or noncompliance). The EPA recently proposed to provide additional clarity on this issue by proposing to restore a sentence to 40 CFR section 70.6(c)(5)(iii)(B) that had been inadvertently deleted, as discussed above.

IV. Discussion of Compliance Certification Content in Clean Air Act Advisory Committee Final Report on the Title V Implementation Experience

In the EPA's February 8, 2013, memorandum to the OIG, stated its intent to address the OIG's recommendation concerning the annual compliance certification, as well as similar recommendations from the Clean Air Act Advisory Committee's Title V Task Force.⁴ While this guidance document responds to the 2005 OIG Report, information provided above overlaps with recommendations from the Title V Task Force. This guidance document does not adopt the Task Force recommendations; however, to the extent that they overlap with the discussion above, the EPA provides some observations regarding those recommendations.

Section 4.7 of the Task Force Report discusses compliance certification forms. This section includes, among other items, comments from stakeholders, a summary of the Task Force discussions, and Task Force recommendations. Of the five recommendations included in this section of the Report, three were unanimously supported by the Task Force members (Recommendations 3, 4, and 5). Task Force Final Report at 119-120. EPA's discussion above regarding the level of specificity and the form of the annual compliance certification generally addresses the two recommendations for which there was not consensus within the Task Force (Recommendations 1 and 2).

The five recommendations, directly quoted from the Task Force Report, are as follows:

⁴ In April 2006, the Title V Task Force finalized a document titled, "Final Report to the Clean Air Act Advisory Committee: Title V Implementation Experience." This document was the result of the Task Force's efforts to review the implementation and performance of the operating permit program under title V of the 1990 Clean Air Act Amendments. Included in the report are a number of recommendations, including some specific recommendations regarding compliance certifications that are consistent with existing regulations and information provided in this guidance document.

Recommendation #1. Most of the Task Force endorsed an approach akin to the "short form" certification, believing that a line-by-line listing of permit requirements is not required and imposes burdens without additional compliance benefit. Under this approach, the compliance certification form would include a statement that the source was in continuous compliance with permit terms and conditions with the exception of noted deviations and periods of intermittent compliance. Although the permittee would cross-reference the permit for methods of compliance, in situations where the permit specifies a particular monitoring method but the permittee is relying on different monitoring, testing or other evidence to support its certification of compliance, that reliance should be specifically identified in the certification and briefly explained. An example of such a case would be where the permit requires continuous temperature records to verify compliance with a minimum temperature requirement. If the chart recorder data was not recorded for one hour during the reporting period because it ran out of ink, and the source relies on the facts that the data before and after the hour shows temperature above the requirement minimum and that the alarm system which sounds if temperature falls below setpoint was functioning and did not alarm during the hour, these two items would be noted as the data upon which the source relies for certifying continuous compliance with the minimum temperature requirement.

Recommendation #2. Others on the Task Force believed that more detail than is included in the short form is needed in the compliance certification to assure source accountability and the enforce-ability of the certification. These members viewed at least one of the following options as acceptable (some members accepting any, while others accepting only one or two):

1. The use of a form that allows sources to use some cross-referencing to identify the permit term or condition to which compliance was certified. Cross-referencing would only be allowed where the permit itself clearly numbers or letters each specific permit term or condition, clearly identifies required monitoring, and does not itself include cross-referencing beyond detailed citations to publicly accessible regulations. The compliance certification could then cite to the number of a permit condition, or possibly the numbers for a group of conditions, and note the compliance status for that permit condition and the method used for determining compliance. In the case of permit conditions that are not specifically numbered or lettered, the form would use text to identify the requirement for which the permittee is certifying.
2. Use of the long form.
3. Use of the permit itself as the compliance certification form with spaces included to identify whether compliance with each condition was continuous or intermittent and information regarding deviations attached.

Recommendation # 3. Where the permit specifies a particular monitoring or compliance method and the source is relying on other information, that information should be separately specified on the certification form.

Recommendation # 4. Where a permit term does not impose an affirmative obligation on the source, the form should not require a compliance certification; e.g., where the permit states that it does not convey property rights or that the permitting authority is to undertake some activity such as provide public notice of a revision.

Recommendation # 5. All forms should provide space for the permittee to provide additional explanation regarding its compliance status and any deviations identified during the reporting period.

Task Force Final Report at 118-120.⁵ With regard to these recommendations, the EPA offers several observations. First, there is nothing in the CAA or Part 70 that prohibits Recommendation 3, 4, and 5, which had unanimous support from the Task Force. *See* 40 CFR section 70.6(c)(5)(iii)-(iv). Second, with regard to Recommendations 3 and 5, these should be considered “best practices” to ensure that the annual certification provides adequate information. Third, Recommendations 1 and 2 outline different ideas surrounding the level of specificity and the form of the annual compliance certification. This guidance document does address those issues and recommends activities consistent with the regulatory requirements while also providing some flexibility on the level of specificity depending on the complexity of the permit conditions being certified.

⁵ With regard to the first recommendation, the EPA observes that the example provided in the Task Force Report identifies a scenario in which additional narrative on the annual compliance certification form would be useful to explain the determination that the sources was (or was not) in compliance with a permit term or condition.

Attachment 2

Implementation Guidance on Statement of Basis Requirements Under the Clean Air Act Title V Operating Permits Program

I. Overview of Legal Requirements for Statement of Basis

Section 502 of the CAA addresses title V permit programs generally. Among other required elements of the EPA's rules implementing title V, Congress stated that the regulations shall include:

Adequate, streamlined, and reasonable procedures for expeditiously determining when applications are complete, for processing such applications, for public notice, including offering an opportunity for public comment and a hearing, and for expeditious review of permit actions, including applications, renewals, or revisions....

CAA section 502(b)(6). The EPA's regulations implementing title V require that a permitting authority provide "a statement that sets forth the legal and factual basis for the draft permit conditions (including references to the applicable statutory or regulatory provisions). The permitting authority shall send this statement to the EPA and to any other person who requests it." 40 CFR section 70.7(a)(5). As will be discussed below, among other purposes, the statement of basis is intended to support the requirements of CAA section 502(b)(6) by providing information to allow for "expeditious" evaluation of the permit terms and conditions, and by providing information that supports public participation in the permitting process, considering other information in the record.

Since the EPA promulgated its Part 70 regulations, the EPA has provided additional guidance and information surrounding the statement of basis. This information is available on EPA's searchable online database of Title V guidance (<http://www.epa.gov/region07/air/policy/search.htm>). A search of that database reveals numerous documents dating back to 1996 that provide feedback regarding the content of the statement of basis.¹ Because the specific content of the statement of basis depends in part on the terms and conditions of the individual permit at issue, the EPA's regulations are intended to provide flexibility to the state and local permitting authorities regarding content of the statement of basis. The statement of basis is required to contain, as the regulation states, sufficient information to explain the "legal and factual basis for the draft permit conditions," 40 CFR section 70.7(a)(5).

II. Guidance on the Content of Statement of Basis

Since promulgation of the Part 70 regulations, the EPA has provided guidance on recommended contents of the statement of basis. Taken as a whole, various title V petition orders and other documents, particularly those cited in those orders, provide a good roadmap as to what should be

¹ See, e.g., Region 10 Questions & Answers No. 2: Title V Permit Development (March 19, 1996) (available online at <http://www.epa.gov/region07/air/title5/t5memos/r10qa2.pdf>).

included in a statement of basis on a permit-by-permit basis, considering, among other factors, the technical complexity of a permit, history of the facility, and the number of new provisions being added at the title V permitting stage. This guidance document identifies a few such documents for example purposes and provides references for locating such materials on the Internet.

The EPA provided an overview of this guidance in a 2006 title V petition order. *In the Matter of Onyx Environmental Services*, Order on Petition No. V-2005-1 (February 1, 2006) (*Onyx Order*) at 13-14. In the *Onyx Order*, in the context of a general overview statement on the statement of basis, the EPA explained,

A statement of basis must describe the origin or basis of each permit condition or exemption. However, it is more than just a short form of the permit. It should highlight elements that U.S. EPA and the public would find important to review. Rather than restating the permit, it should list anything that deviates from simply a straight recitation of applicable requirements. The statement of basis should highlight items such as the permit shield, streamlined conditions, or any monitoring that is required under 40 C.F.R. § 70.6(a)(3)(i)(B). Thus, it should include a discussion of the decision-making that went into the development of the title V permit and provide the permitting authority, the public, and U.S. EPA a record of the applicability and technical issues surrounding the issuance of the permit. (Footnotes omitted.) See, e.g., *In Re Port Hudson Operations, Georgia Pacific*, Petition No. 6-03-01, at pages 37-40 (May 9, 2003) ("*Georgia Pacific*"); *In Re Doe Run Company Buick Mill and Mine*, Petition No. VII-1999-001, at pages 24-25 (July 31, 2002) ("*Doe Run*"); *In Re Fort James Camas Mill*, Petition No. X-1999-1, at page 8 (December 22, 2000) ("*Ft. James*").

Onyx Order at 13-14. In the *Onyx Order*, there is a reference to a February 19, 1999, letter that identified elements which, if applicable, should be included in the statement of basis. In that letter to Mr. David Dixon, Chair of the California Air Pollution Control Officers Association (CAPCOA) Title V Subcommittee, the EPA Region 9 Air Division provided a list of air quality factors to serve as guidance to California permitting authorities that should be considered when developing a statement of basis for purposes of EPA Region 9's review. Specifically, this letter identified the following elements which, if applicable, should be included in the statement of basis:

- additions of permitted equipment which were not included in the application,
- identification of any applicable requirements for insignificant activities or State-registered portable equipment that have not previously been identified at the Title V facility,
- outdated SIP requirement streamlining demonstrations,
- multiple applicable requirements streamlining demonstrations,
- permit shields,
- alternative operating scenarios,
- compliance schedules,
- CAM requirements,

- plant wide allowable emission limits (PAL) or other voluntary limits,
- any district permits to operate or authority to construct permits,
- periodic monitoring decisions, where the decisions deviate from already agreed-upon levels. These decisions could be part of the permit package or could reside in a publicly available document. (Parenthetical omitted)

Enclosure to February 19, 1999, letter from Region 9 to Mr. David Dixon.

In 2001, in a letter from the EPA to the Ohio Environmental Protection Agency, which is also cited to in the *Onyx Order*, the EPA explained that:

The [statement of basis] should also include factual information that is important for the public to be aware of. Examples include:

1. A listing of any Title V permits issued to the same applicant at the plant site, if any. In some cases it may be important to include the rationale for determining that sources are support facilities.
2. Attainment status.
3. Construction and permitting history of the source.
4. Compliance history including inspections, any violations noticed, a listing of consent decrees into which the permittee has entered and corrective action(s) taken to address noncompliance.

Letter from Stephen Rothblatt, EPA Region 5 to Robert Hodanbosi, Ohio EPA, December 20, 2001 (available online at <http://www.epa.gov/region07/air/title5/t5memos/sbguide.pdf>). In 2002, in the context of finding deficiencies with the State of Texas operating permits program, the EPA explained that, "a statement of basis should include, but is not limited to, a description of the facility, a discussion of any operational flexibility that will be utilized at the facility, the basis for applying the permit shield, any federal regulatory applicability determinations, and the rationale for the monitoring methods selected." 67 FR 732, 735 (January 7, 2002).

The EPA has also addressed statement of basis contents in additional title V petition orders (available in an online searchable database at <http://www.epa.gov/region7/air/title5/petitiondb/petitiondb.htm>). In some cases, title V petition orders provide information even where a statement of basis is not directly at issue. For example, the EPA has interpreted 40 CFR section 70.7(a)(5) to require that the rationale for selected monitoring methods be clear and documented in the permit record. *In the Matter of CITGO Refining and Chemicals Company LP (CITGO)*, Order on Petition No. VI-2007-01 (May 28, 2009) at 7; *see also In the Matter of Fort James Camas Mill (Fort James)*, Order on Petition No. X-1999-1 (December 22, 2000) at page 8. This type of information could be included in the statement of basis. The EPA observes that where such information is included in the statement of basis, this can facilitate a better understanding of the rationale for monitoring. Such information could also be included in other parts of the permit record. In addition, it is particularly helpful when the statement of basis identifies key issues that the permitting authority anticipates would be a priority for EPA or public review (for example, if such issues represent new conditions or

interpretations of applicable requirements that are not explicit on their face). See, e.g., *In the Matter of Consolidated Edison Co. Of NY, Inc. Ravenswood Steam Plant*, Order on Petition No. II-2001-08 (Sept. 30, 2003) at page 11; *In the Matter of Port Hudson Operation Georgia Pacific*, Order on Petition No. 6-03-01 (May 9, 2003) at pages 37-40; *In the Matter of Doe Run Company Buick Mill and Mine (Doe Run)*, Order on Petition No. VII-1999-001 (July 31, 2002) at pages 24-26; *In the Matter of Los Medanos Energy Center* (Order on Petition) (May 24, 2004) at pages 14-17.

Each of the various documents referenced above provide generalized recommendations for developing an adequate statement of basis rather than “hard and fast” rules on what to include. Taken as a whole, they provide a good roadmap as to what should be included in a statement of basis on a permit-by-permit basis, considering, among other factors, the technical complexity of the permit, history of the facility, and the number of new provisions being added at the title V permitting stage.²

III. Discussion of Statement of Basis Content in Clean Air Act Advisory Committee Final Report on the Title V Implementation Experience

In the EPA’s February 8, 2013, memorandum to the OIG, the EPA stated its intent to address the OIG’s recommendation concerning the statement of basis, as well as similar recommendations from the Clean Air Act Advisory Committee’s Title V Task Force.³ While this guidance document responds to the 2005 OIG Report, information provided above overlaps with recommendations from the Title V Task Force. This guidance document does not adopt the Task Force recommendations; however, to the extent that they overlap with the discussion above, the EPA provides some observations regarding those recommendations.

Section 5.5 of the Task Force Final Report addresses the statement of basis. This section includes a regulatory background piece, comments from stakeholders, a summary of the Task Force discussions, and Task Force recommendations. The recommendations section includes a list of items considered appropriate for inclusion into a statement of basis. Final Report at 231. Members of the Task Force unanimously supported the recommendations regarding the statement of basis. Because these recommendations overlaps substantially, if not wholly, with guidance previously provided by EPA, it is appropriate to include these recommendations within this guidance document as an additional guideline for developing an adequate statement of basis.

The Task Force recommended that the following items are appropriate for inclusion in a statement of basis document:

² With regard to the title V permitting stage, a best practice includes making previous statements of basis accessible to give background on provisions that already exist in the permit and may not be a part of the permit action at issue, and provide context for the permit as a whole and the particular revisions at issue in that permit action or permit stage.

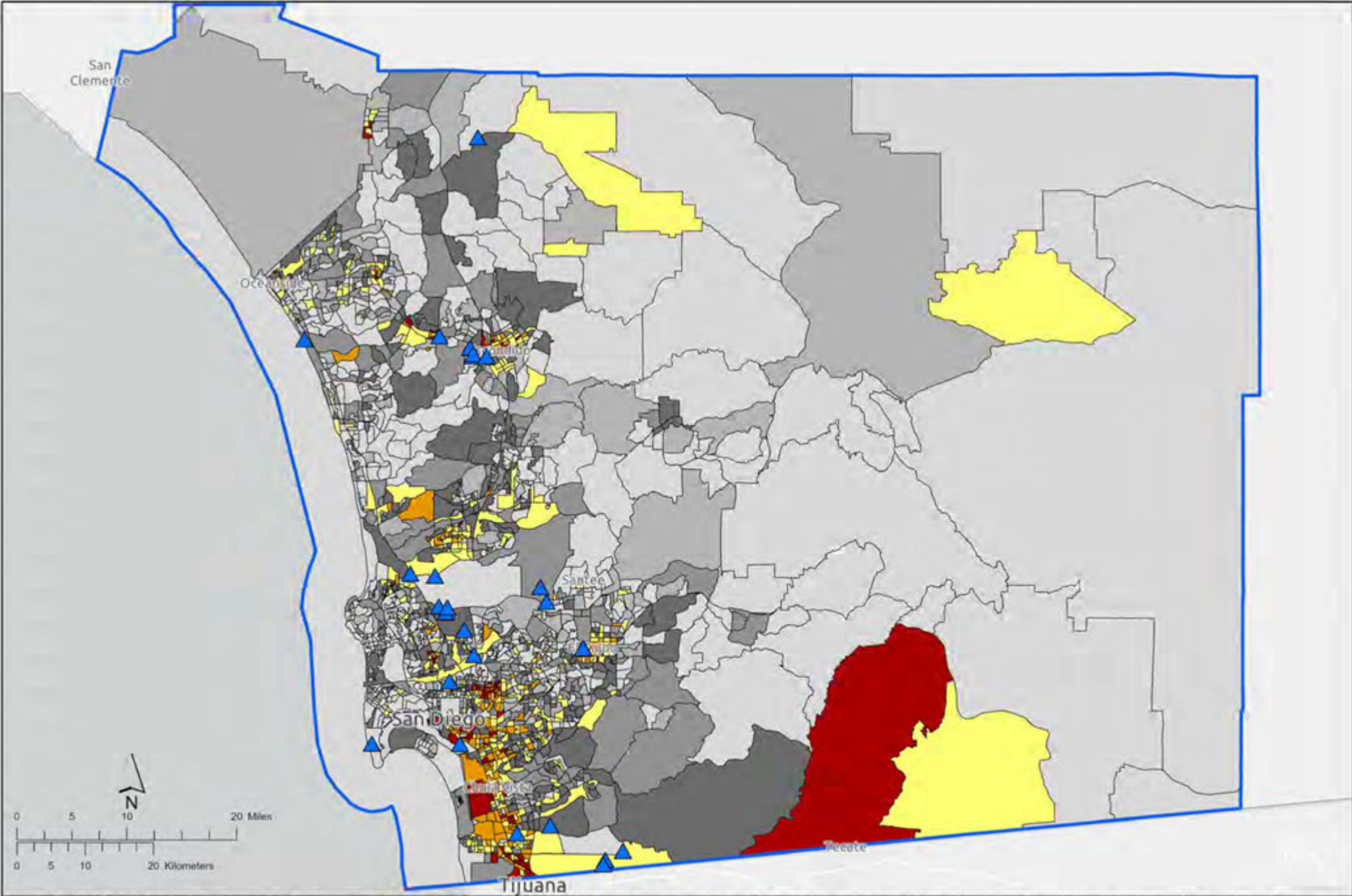
³ In April 2006, the Title V Task Force finalized a document titled, “Final Report to the Clean Air Act Advisory Committee: Title V Implementation Experience.” This document was the result of the Task Force’s efforts to review the implementation and performance of the operating permit program under title V of the 1990 Clean Air Act Amendments. Included in the report are a number of recommendations, including specific recommendations regarding statement of basis contents that overlap with or are informative to this guidance document.

1. A description and explanation of any federally enforceable conditions from previously issued permits that are not being incorporated into the Title V permit.
2. A description and explanation of any streamlining of applicable requirements pursuant to EPA White Paper No. 2.
3. A description and explanation of any complex non-applicability determination (including any request for a permit shield under section 70.6(f)(1)(ii)) or any determination that a requirement applies that the source does not agree is applicable, including reference to any relevant materials used to make these determinations (e.g., source tests, state guidance documents).
4. A description and explanation of any difference in form of permit terms and conditions, as compared to the applicable requirement upon which the condition was based.
5. A discussion of terms and conditions included to provide operational flexibility under section 70.4(b)(12).
6. The rationale, including the identification of authority, for any Title V monitoring decision.

Task Force Final Report at 231. With regard to these recommendations, the EPA offers several observations. First, there is nothing in the CAA or Part 70 that precludes a permitting authority from including the items listed above in a statement of basis. Not all of those items will apply to every permit action (as is the case with the lists provided by the EPA in the previously-cited guidance documents). Second, concerning item #1, we note that there are very limited circumstances in which a condition from a previously issued permit would not need to be incorporated into the title V permit. Third, concerning item #2, the "White Paper" refers to "White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program", dated March 5, 1996 (available online at <http://www.epa.gov/region07/air/title5/t5memos/wtppr-2.pdf>).

In developing the statement of basis, as was discussed earlier, the EPA recommends that permitting authorities consider the individual circumstances of the permit action in light of the regulatory requirements for the permit record in order to determine whether information along the lines of the items identified by the Task Force warrants inclusion into the statement of basis. In making this determination, the permitting authority is encouraged to consider whether the inclusion of such information would provide important explanatory information for the public and the EPA, and bolster the defensibility of the permit (thus improving the efficiency of the permit process and reducing the likelihood of receiving an adverse comment or an appeal), while also ensuring that the statutory and regulatory requirements are being met.

Appendix D. Map of Linguistically Isolated Households in the SDAPCD



PERCENTAGE OF LINGUISTICALLY ISOLATED HOUSEHOLDS AND PERMITTED TITLE V FACILITIES IN SAN DIEGO COUNTY, CALIFORNIA

ARD22058 San Diego Linguistic Isolation.aprx (5/12/2022)
 Sources: SanGIS, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS. This content item is licensed under the US EPA Data Licensing Agreement for public use. License Summary / Terms of Use Shared Enterprise Gooddata and Services (SEGS) is an EPA-curated collection of recommended geospatial assets that are nationally relevant and support the Agency's mission to protect human health and the environment. By connecting EPA users with curated datasets and promoting service reuse, SEGS aims to enhance information access, reduce data-storage costs, and improve the consistency and quality of data at the US EPA. The Shared Enterprise Gooddata and Services (SEGS) team welcomes your feedback. Please submit general comments and questions to the SEGS Shared Mailbox, which is managed by the EPA Office of Mission Support (OMS). Requests for new datasets and related updates should be logged using the SEGS Sharepoint Form. Additional information about this program is available in Microsoft Teams and SEGS services employed using the SEGS Data Discovery Tool. Please Note: This SEGS content item may require an ArcGIS Online organizational subscription or an ArcGIS Developer account. Please contact the National Geospatial Support Team or an EPA GIS Administrator for assistance accessing the EPA GeoPlatform Online. Public and organizational SEGS services may also be accessed through use of the following actions: Sign in with an account that is a member of an organizational subscription. Sign in with a developer account. Sign in with credentials from an Esri-registered application.

San Diego County boundary

Title V permitted facility

Less than 50% side

50-60% side

60-70% side

70-80% side

80-90% side

90-95% side

95-100% side



Appendix E. Fee Guidances



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

MAR 27 2018

MEMORANDUM

SUBJECT: Program and Fee Evaluation Strategy and Guidance for 40 CFR Part 70

FROM: Peter Tsirigotis
Director

TO: Regional Air Division Directors, Regions 1 – 10

The attached guidance is being issued in response to the Environmental Protection Agency Office of Inspector General's (OIG) 2014 report regarding the importance of enhanced EPA oversight of state, local, and tribal¹ fee practices under title V of the Clean Air Act (CAA).² Specifically, this guidance reflects the EPA's August 22, 2014, commitment to the OIG in response to the OIG's Recommendations 2 through 8 to "issue a guidance document that sets forth a fee oversight strategy" (we refer to the attached guidance as the "**title V evaluation guidance**"). The EPA's response to the OIG's other recommendation is being issued concurrently in a separate memorandum and guidance concerning the EPA's review of fee schedules for title V programs ("updated fee schedule guidance").³

The title V evaluation guidance is consistent with EPA principles and best practices for efficient and effective oversight of state permitting programs⁴ and applies those principles and best practices to the specific context of title V program and fee evaluations under part 70 of the CAA. As a result, this guidance highlights opportunities for communication and collaboration between the EPA and air agencies throughout the evaluation process. Principles and best practices are discussed in Section I of the attached title V evaluation guidance.

¹ As used herein, the term "air agency" refers to state, local, and tribal agencies.

² *Enhanced EPA Oversight Needed to Address Risks from Declining Clean Air Act Title V Revenues*; U.S. EPA Office of the Inspector General. Report No. I5-P-0006. October 20, 2014 ("OIG Report").

³ *Updated Guidance on EPA Review of Fee Schedules for Operating Permit Programs Under Title V*, Peter Tsirigotis, Director, Office of Air Quality Planning and Standards (OAQPS), U.S. EPA, to Regional Air Division Directors, Regions 1 – 10, March 27, 2018 ("updated fee schedule guidance"). See the EPA's title V guidance website at <https://www.epa.gov/title-v-operating-permits/title-v-operating-permit-policy-and-guidance-document-index>.

⁴ See *Promoting Environmental Program Health and Integrity: Principles and Best Practices for Oversight of State Permitting Programs* (August 30, 2016).

Example best practices for conducting part 70 fee or program evaluations described in the guidance, as well as other existing guidance documents relevant to title V evaluations, include:

Example Best Practices:

- iii The frequency and timing of program and fee evaluations are defined in the Office of Air and Radiation's National Program Manager Guidance (NPM guidance), which is issued for a 2-year period.⁵ See Section III of the title V evaluation guidance.iii
- iii The EPA will post final evaluation reports on publicly accessible websites established for this purpose. See Section III.D of the title V evaluation guidance.iii
- iii A best practice for resolving concerns that arise during or after an evaluation is to use collaborative approaches, such as face-to-face meetings between the air agency and the EPA when possible, and preferably prior to taking formal approaches provided for in the part 70 regulations. See Section III.E of the title V evaluation guidance.

Other Available Guidance:

- iii EPA guidance on the sufficiency of fees and other fee requirements of part 70 for permitting programs, including guidance on certain requirements related to fee demonstrations. See Section IV of the title V evaluation guidance.iii
- iii EPA guidance on governmental accounting standards tailored to the part 70 program, including an example method for calculating annual fees, costs, and the "presumptive minimum" fee amount; types of revenue that may be counted as "fees"; clarification on the definition of "direct costs," "other direct costs," and "indirect costs"; and a review of methods for determining indirect costs. See list of EPA guidance on part 70 fee requirements in Attachment B of the title V evaluation guidance.iii

Finally, the title V evaluation guidance contains several attachments:iii

- iii Attachment A is a checklist that may be used by the EPA to help plan for a particular program or fee evaluation using a step-by-step approach with suggested timeframes for completing each step, including a timeframe for the issuance of the final evaluation report.iii
- iii Attachment B is a list of reference documents and other resources that may be useful as background information for reviewing issues that may arise during a program or fee evaluation.iii
- iii Attachment C provides an example annual financial data reporting form. It may be used as a tool to collect information to track an air agency's compliance with certain part 70 fee requirements. The form may be used to track information on fee revenue, program costs, and the presumptive minimum fee amount for a particular air agency. The example form also includes helpful explanations of common accounting terms referenced in part 70.iii

The EPA is also working to increase and improve internal collaboration, communication, expertise, and the sharing of information between the EPA staff working on title V evaluations. For example, as a best practice, the EPA plans to establish an internal system to facilitate staff input on and sharing of evaluation tools and evaluation reports.

⁵ See *Final FY 2017 OAR National Program Manager Guidance Addendum*, U.S. EPA, Publication Number 440B16001 (May 6, 2016) (NPM guidance) located at <https://www.epa.gov/sites/production/files/2016-05/documents/fy17-oar-npm-guidance-addendum.pdf>.

The development of this guidance included outreach and discussions with stakeholders, including the EPA Regions, the National Association of Clean Air Agencies, and the Association of Air Pollution Control Agencies.

If you have any questions concerning the title V evaluation guidance, please contact Juan Santiago, Associate Director, Air Quality Policy Division, Office of Air Quality Planning and Standards, at (919) 541-1084 or santiago.juan@epa.gov.

Attachments

1. Program and Fee Evaluation Strategy Guidance for 40 CFR Part 70 (“title V evaluation guidance”)
2. Attachment A – Evaluation Checklist for 40 CFR Part 70
3. Attachment B – Resources
4. Attachment C – Example Annual Financial Data Form for 40 CFR Part 70

DISCLAIMER

These documents explain the requirements of the EPA's regulations, describe the EPA's policies, and recommend procedures for sources and permitting authorities to use to ensure that program evaluations and fee evaluations are consistent with applicable regulations. These documents are not a rule or regulation, and the guidance they contain may not apply to a particular situation based upon the individual facts and circumstances. The guidance does not change or substitute for any law, regulation, or any other legally binding requirement and is not legally enforceable. The use of non-mandatory language such as "guidance," "recommend," "may," "should," and "can," is intended to describe the EPA's policies and recommendations. Mandatory terminology such as "must" and "required" is intended to describe controlling requirements under the terms of the Clean Air Act and the EPA's regulations, but the documents do not establish legally binding requirements in and of themselves.

Program and Fee Evaluation Strategy Guidance for 40 CFR Part 70

I. Principles and Best Practices for EPA Oversight of Permitting Programs

As part of the EPA's ongoing efforts to strengthen partnerships with state, local, and tribal agencies (referred to here as, "air agencies"), in 2016, the EPA established common principles and best practices for oversight of state permitting programs for air, water, and solid waste. *See Promoting Environmental Program Health and Integrity: Principles and Best Practices for Oversight of State Permitting Programs*, August 30, 2016.¹ The principles and best practices are intended to promote efficient and effective oversight that optimizes both collaboration and accountability in support of program health and integrity.

The title V evaluation guidance aligns with these principles and best practices and will consider them in title V evaluations of local and tribal air permitting programs as well as state programs. For example, this guidance provides for air agency evaluations that will be accomplished through clear, accurate, and up-to-date guidance, including guidance on evaluations and fee requirements for air agencies; routine review of air agency programs to identify and implement program improvements; requirements for yearly program evaluations on timeframes established in the Office of Air and Radiation's National Program Manager Guidance (NPM guidance);² the use of tools, including checklists, for planning and tracking the timely completion of evaluations; opportunities for collaboration between the EPA and air agencies throughout the evaluation process; and electronic posting of final evaluation reports.

II. Summary of Title V Requirements for Air Agencies

A. General Program Requirements

Title V of the Clean Air Act (CAA or Act) of 1990 establishes an operating permit program for major sources of air pollutants, as well as some other sources.³ The EPA promulgated regulations under 40 CFR part 70 (part 70), consistent with title V of the Act, to establish the minimum elements for operating permit programs to be administered by permitting authorities.

Air agencies with approved permit programs under part 70 must comply with minimum permit program requirements, such as reviewing application forms, adhering to certain permit processing procedures (including timeframes), ensuring certain permit content, collecting fees sufficient to fund the program, providing for public participation and EPA review of individual

¹ The report is located at https://www.epa.gov/sites/production/files/2016-10/documents/principles_and_best_practices_for_oversight_of_state_permitting_programs.pdf.

² The latest NPM guidance is for FY 2018 and FY 2019: *Final FY 2018 - 2019 OAR National Program Manager Guidance*, U.S. EPA, Publication Number 440P17002 (September 29, 2017) (NPM guidance) located at <https://www.epa.gov/sites/production/files/2017-09/documents/fy18-19-oar-npm-guidance.pdf>. The most recent NPM guidance should be consulted for specific program requirements and timeframes.

³ See CAA §§ 501-507; 42 U.S.C. §§ 7661-7661f.

permits, and supplementing permits with compliance provisions (when needed), among other requirements.⁴

B. Summary of Title V Fee Requirements

The EPA is issuing a separate memorandum and updated fee schedule guidance on the activities that constitute title V permit program costs and must, therefore, be funded by permit fees. The requirements for air agency fee programs are further discussed in Section I of the updated fee schedule guidance.⁵ This title V evaluation guidance identifies best practices and guidance on EPA oversight of air agency fee programs, particularly through program and fee evaluations. Attachment B of the title V evaluation guidance provides a list of all previously issued EPA guidance on part 70 fee requirements. The following is a summary of the fee requirements that will guide the EPA reviews of air agency programs:⁶

- Permit fees must be paid by “part 70 sources,”⁷ and the permit fees must cover all “reasonable (direct and indirect) costs” of the permit program.⁸ If the permit fees at least cover the total permit program costs, the fees are deemed to be sufficient.
- Permit fees paid by “part 70 sources” are “exchange revenue” or “earned revenue” in governmental accounting terminology because a good or service (e.g., a permit) is exchanged by a governmental entity for a price (e.g., a permit fee).⁹ Only revenue classified as “exchange revenue” should be compared to costs to determine the overall financial results of operations for a period.¹⁰ This means that no legislative appropriations, taxes, grants,¹¹ fines and penalties, which are generally characterized as

⁴ See 40 CFR §§ 70.1(a) and 70.4.

⁵ *Updated Guidance on EPA Review of Fee Schedules for Operating Permit Programs Under Title V*, Peter Tsirigotis, Director, OAQPS, to Regional Air Division Directors, Regions 1 – 10, March 27, 2018 (updated fee schedule guidance).

⁶ See the updated fee schedule guidance at Section I. General Principles for Review of Title V Fee Schedules.

⁷ The term “part 70 sources” is defined in 40 CFR §70.2 to mean “any source subject to the permitting requirements of this part, as provided in 40 CFR §§ 70.3(a) and 70.3(b) of this part.”

⁸ See CAA section 502(b)(3)(A); 40 CFR § 70.9(a).

⁹ See Statement of Recommended Accounting Standards Number 7, *Accounting for Revenue and Other Financing Sources and Concepts for Reconciling Budgetary and Financial Accounting*, issued by the Federal Accounting Standards Advisory Board (FASAB) (“FASAB No. 7”) at page 2 and see Statement No. 33, *Accounting and Financial Reporting for Nonexchange Transactions* (December 1998), issued by the Governmental Accounting Standards Board (GASB) at pages 1-4.

¹⁰ See FASAB No. 7 at page 8. For example, see Governmental Accounting Standards Series, Statement No. 33, *Accounting and Financial Reporting for Nonexchange Transactions* (December 1998), issued by GASB, and Statement of Recommended Accounting Standards Number 7, *Accounting for Revenue and Other Financing Sources and Concepts for Reconciling Budgetary and Financial Accounting*, issued by FASAB.

¹¹ Since part 70 fees are “program income” under 40 CFR § 31.25(a), part 70 fees cannot be used as match for section 105 grants, and no state may count the same activity for both grant and part 70 fee purposes. See an October 22, 1993, memo (and several other memos) on this subject, listed in Attachment B of this document.

“non-exchange revenue,”¹² should be compared to program costs to determine if permit fees are sufficient to cover costs.

- iii Any fee required by part 70 must “be used solely for permit program costs”—in other words, required permit fees may not be diverted for non-part 70 purposes.^{13,14} Nothing in part 70 restricts air agencies from collecting additional fees beyond the minimum amount needed to cover part 70 program cost; however, all fees (including surplus) must be used for part 70 purposes.
- iii During permit program implementation, the EPA may require “periodic updates” of the “initial accounting” portion of the “fee demonstration” to show whether fee revenue required by part 70 is used solely to cover the costs of the permit program.¹⁵
- iii During program implementation, the EPA may also require a “detailed accounting” to show that the fee schedule is adequate to cover costs when an air agency changes its fee schedule to collect *less than* the “presumptive minimum”¹⁶ or if the EPA determines, based on comments rebutting a presumption of fee sufficiency or on the EPA’s initiative, that there are serious questions regarding whether the fee schedule is sufficient to cover the permit program costs.¹⁷

¹² “Nonexchange revenue” arises primarily from the exercise of governmental power to demand payment from the public (e.g., income tax, sales tax, property taxes, fines, and penalties) and when a government gives value directly without directly receiving equal value in return (e.g., legislative appropriations and intergovernmental grants).

¹³ Part 70 purposes are all activities in a permit program that must be funded by part 70 fees. As the EPA has previously explained in the EPA’s November 1993 memo, *Title V Fee Demonstration and Additional Fee Demonstration Guidance* (“*fee demonstration guidance*”), the types of activities included in a permit program to be funded by permit fees, and the costs of those activities will differ depending on many factors associated with the particular permitting authority. These include the number and complexity of sources within the area covered by the program; how often the permitting authority reviews permits (e.g., some permitting authorities may renew permits every year instead of every 5 years); the universe of sources covered (i.e., some permitting authorities may not opt to defer permitting for non-major sources); the experience of the permitting authority with permitting (e.g., agencies with permitting experience may not need as extensive training programs as those with no operating permit experience); and many other factors. Each permitting authority will have to determine its own permitting effort and what activities are directly or indirectly concerned with operating permits.

¹⁴ See 40 CFR § 70.9(a).

¹⁵ See fee demonstration requirements at 40 CFR §§ 70.9(c) and 70.9(d) and see the EPA’s November 1993 memo, *Title V Fee Demonstration and Additional Fee Demonstration Guidance* (“*fee demonstration guidance*”), on preparing fee demonstrations for the initial part 70 program submittal.

¹⁶ A fee schedule that would result in fees above the “presumptive minimum” is considered to be “presumptively adequate.” The “presumptive minimum” is generally defined to be “an amount *not less than* \$25 per year [adjusted for increases in the Consumer Price Index] times the total tons of the actual emissions of each “regulated air pollutant (for presumptive fee calculation)” emitted from part 70 sources.” Note that the calculation of the “presumptive minimum” also excludes certain emissions and adds a “GHG cost adjustment.” See 40 CFR 70.9(b)(2)(i) through (v).

¹⁷ See 40 CFR § 70.9(b)(5) and Section 2.0 of the fee demonstration guidance for an example “detailed accounting.” The scope and content of a “detailed accounting” may vary but will generally involve information on program fees and costs and accounting procedures and practices that will show how the air agency’s fee schedule will be sufficient to cover all program costs.

III.iii Best Practices for EPA Evaluation of Part 70 Programsiii

This section includes an overview of title V program and fee evaluations and describes the EPA's recommended best practices for conducting program and fee evaluations. This includes a general process and recommended steps for conducting such evaluations, including a timeframe for completion of final evaluation reports. This section also includes recommendations for activities that may occur after a final evaluation report is issued, including for resolution of concerns raised during an evaluation process, and for public posting of final evaluation reports.

A.iii Overview of Part 70 Program and Fee Evaluationsiii

In its oversight capacity, the EPA periodically evaluates part 70 programs to ensure that they are being implemented and enforced in accordance with the requirements of title V and part 70. Program and fee evaluations help the EPA pinpoint areas for program improvement, determine if previously suggested areas of improvement have been addressed by the air agency, and identify best practices that can be shared with other air agencies and the EPA Regions to promote program health and integrity.

The frequency and timeframes for conducting part 70 evaluations are documented in the NPM¹⁸ guidance.^a The frequency and timeframe for a specific evaluation should be consistent with the NPM guidance for the period in which the evaluation occurs.¹⁹ The current NPM guidance requires each EPA Region to complete one part 70 evaluation each year. This means that final evaluation reports should be issued within a 1-year timeframe.²⁰ It may be possible for the EPA to complete some evaluations on a shorter timeframe than specified by the NPM guidance when the scope of an air agency evaluation is tailored to some element of the program, based on previous performance, as evidenced by previous evaluations. Looking for these opportunities and completing evaluation reports in less than a year is encouraged as a best practice.

Program evaluations can be conducted on any particular element or elements of the part 70 program, including the complete program, or the air agency's implementation (including fee reviews), enforcement, and legal authority for the program.

As a best practice, the EPA Regions should review previous evaluation results that may help inform and tailor the appropriate scope of an upcoming evaluation and may give particular focus to issues that have previously been identified as problematic. In addition, the EPA Regions should be aware of any recent statutory or regulatory changes (including to federal or state rules) and may want to focus part of the evaluation on these newer implementation areas.

¹⁸ The final FY 2018 – 2019 NPM guidance includes a goal for the EPA Regions to perform an evaluation for at least one permitting authority for each EPA Region per year. The Regional goals in the guidance are reviewed periodically and may change in the future.

¹⁹ The NPM guidance is currently revised on a 2-year cycle. The current guidance is effective for fiscal years 2018 and 2019.

²⁰ The EPA notes that program or fee evaluations are not currently required to begin on the first day of the fiscal year; thus, an evaluation may start during one fiscal year and end during the next fiscal year.

To ensure that permitting authorities have adequate resources to implement their part 70 programs, another best practice is to conduct a fee evaluation as part of the overall program evaluation. The content and scope of a fee evaluation may be specific to the air agency being evaluated, but frequent topics include those identified in Sections II.B and IV of this title V evaluation guidance.

B. Preparing for Title V Evaluations

Developing an evaluation checklist and an evaluation questionnaire can help expedite the program review process and is considered a best practice for the EPA Regions in preparing for a part 70 program evaluation. An example evaluation checklist, to plan for and track the progress of a particular evaluation, is provided in Attachment A. An evaluation checklist provides a framework of specific topics to be evaluated and recommended steps leading to issuance of a final evaluation report, including a timeline based on the 1-year timeframe of the current NPM guidance. Note that the timeframes for the individual steps in the example checklist are flexible, provided the 1-year overall timeframe is met. Another recommended best practice is to share the checklist with the air agency prior to the actual evaluation to assist them in preparing for the evaluation.

An evaluation questionnaire is another tool that the EPA Regions may prepare in advance of an evaluation. Typically, an evaluation questionnaire is a compilation of specific questions intended to gather information and data from an air agency to assist the EPA in its evaluation of a particular part 70 program. As a best practice, the EPA Regions should share draft questionnaires with other EPA Regions or Headquarters offices to seek input and share “lessons learned” prior to transmitting to the air agency. Collaboration can enhance national consistency and help the Regional office learn from the experiences of other Headquarters offices.

C. Information and Data Gathering Phase

An important initial step of any program or fee evaluation is gathering information about current program implementation. Typically, an evaluation formally begins when the EPA Region sends a letter to the air agency informing the agency of the EPA’s intent to conduct an evaluation, with a request for specific information and data needed to conduct the evaluation. Usually such a letter will be preceded by an informal call or email to provide the air agency with notice of the evaluation. The letter should specify the scope of the evaluation and a timeline for when a response from the air agency is expected. As a best practice, if the EPA Region intends to use an evaluation questionnaire, that questionnaire should be included with the letter.

The next recommended step is for the air agency to respond in writing to the EPA’s questions and provide the information or data that was requested. The length of time to complete this step is dependent on the scope of the evaluation and the air agency’s data collection systems. If the air agency foresees an issue with providing the information requested in a timely manner, it should reach out to the EPA Region to discuss steps to address the issue and reach consensus on a revised timeline.

If resources allow, the EPA Region should, as a best practice, conduct an in-person meeting with the air agency shortly after sending the letter (and questionnaire if one is to be used) to answer

preliminary questions on timing and scope. In addition, the EPA Region and the air agency could hold a follow-up meeting to discuss the air agency's draft response. In preparing for these meetings, the EPA staff should make every effort to gather as much relevant information as possible before meeting with the air agency in order to make the best use of time.

In addition to the evaluation questionnaire, another method for collecting information or data for an evaluation includes file and permit reviews. File reviews may also be used by the EPA to evaluate the effective implementation of certain program responsibilities (e.g., to quality assure fee collection procedures). The EPA may use a permit review (reviewing a sample of issued permits) to evaluate whether the air agency is satisfying permit-content requirements and permit-issuance procedures in practice.²¹

D. Evaluation Report Phase

The EPA staff should document each title V evaluation in an evaluation report. The report may describe concerns identified during the evaluation and, if any concerns are identified, may include recommended corrective actions with intended timeframes for resolution. The EPA may also ask the air agency to provide an explanation of how it will resolve these concerns and an estimate of the timeframe needed for the air agency to complete its work.

The EPA staff drafting the evaluation report should consult with Regional management or Headquarters offices as needed, particularly if the report addresses nationally significant issues. Once completed, the draft evaluation report's findings and recommendations, including those addressing novel or controversial issues, should be shared with EPA management and other offices.

As a best practice, the EPA should provide the draft report to the air agency with an option to provide comments back to the EPA. During this time, the EPA and the air agency may also choose to have further discussions of the draft report findings. If further discussion occurs, additional time may be necessary to complete the final report and corrective action plan.

After attaching any air agency comments to the report and revising the report to incorporate input from EPA management and the air agency being evaluated, the final report should be signed by the relevant EPA air program manager or other designated EPA official. The final report should then be transmitted to the air agency and an electronic copy should be posted on a publicly accessible website maintained by the EPA (the Regional websites are linked to the national webpage for the part 70 program).²² As a best practice, any supporting information related to the evaluation should be posted on the EPA website with the final report, including the air agency's response to the questionnaire, relevant communications, and other supporting data. Approaches used to address novel or controversial issues should be summarized and shared for potential use in future reviews.

²¹ See 40 CFR §§ 70.6 and 70.7.

²² See <https://www.epa.gov/title-v-operating-permits/epa-oversight-operating-permits-program>.

The EPA may provide an opportunity for the air agency to respond in writing to the final evaluation report, particularly in cases where the EPA identified concerns but a corrective action plan was not agreed upon during the preparation of the final report. This step is not necessarily part of the evaluation process and may proceed on a separate track. The EPA would not expect such responses to necessarily be part of the final report, particularly in cases where the responses occur after the final report has been transmitted to the air agency. However, these post-report responses may be included as supporting information on the website, along with the final report.

The EPA encourages its staff to, where possible, conduct in-person meetings with their air agency counterparts in order to best facilitate resolution of any issues identified in the report. Depending on the complexity of the issue, such face-to-face meetings may be facilitated by the involvement of a third-party negotiator or other EPA offices (e.g., the Office of the Chief Financial Officer) as appropriate. Such meetings may prove useful to resolve straight forward issues that can be expeditiously resolved (e.g., permit administration or implementation issues that do not require regulatory changes), as well as to discuss long-term plans for resolving more complex issues (e.g., where resolution may involve changes to statutory authority, regulatory changes, or a multi-step process that may take multiple years to complete). In cases where initial discussions between the EPA and air agency staff do not result in a plan to resolve issues, a best practice is to elevate the issue to the management level (e.g., EPA and air agency management).

Finally, if the issue resolution process described above fails to resolve the issues identified during a program or fee evaluation, the EPA has the authority to consider whether an official EPA finding of a program deficiency is warranted.²³ The decision to make such a finding should be coordinated with EPA management at the Regional and Headquarter level. Section 502(i) of the Act provides that whenever the EPA Administrator determines that an air agency is not adequately administering or enforcing a title V program, or any portion of a title V program, the EPA shall provide notice to the air agency and may take certain measures intended to incentivize compliance. In practice, the EPA refers to the determination as a “finding,” the inadequate administration or implementation as a “deficiency,” and the notice as a “Notice of Deficiency” (NOD).²⁴ The EPA will use its best judgment to decide when a finding of a program deficiency is warranted; whenever such a finding is made, the EPA will issue an NOD and follow the requirements that flow from that finding.

²³ See 40 CFR §§ 70.10(b) and 70.4(i)(1).

²⁴ NODs are published in the *Federal Register*.

IV. Assessment of Fee Sufficiency and Other Fee Requirements

This section discusses the requirement for part 70 permit fees to be sufficient to cover program costs, including requirements for updates to certain elements of part 70 fee demonstrations, including for “periodic updates” to the “initial accounting” and for a “detailed accounting” in certain circumstances. This section also discusses Attachment C, which is an example annual financial data reporting form that may be used to report fee revenue, program costs, and to calculate the “presumptive minimum” for an air agency for a particular year.

Fee sufficiency. The part 70 rule uses the term “sufficient” in relation to fees and costs.²⁵ Since the question of whether fees are sufficient is a key concern that may be considered by the EPA as part of a program or fee evaluation, further explanation may be helpful:

- Section 502(b)(3)(A) of the Act requires permit programs to fund all “reasonable (direct and indirect) costs” of the permit programs through permit fees collected from sources. Similarly, part 70 requires the fees to be paid by “part 70 sources,”²⁶ requires the fees to be sufficient to cover all reasonable permit program costs, and requires the fees to be used “solely” for permit program costs.²⁷
- The costs against which fees are compared must include, at a minimum, certain activities required by the part 70 rules²⁸ and all “reasonable (direct and indirect) costs.”²⁹ Additional discussion on the revenue and costs that should be used in this comparison is provided in the separate updated fee schedule guidance as well as Section II.B of this title V evaluation guidance.
- If concerns regarding fee sufficiency are raised by the EPA, the EPA will typically follow the issue resolution procedures discussed in Section III.E of this title V evaluation guidance.

Initial fee demonstration. As part of the initial part 70 program submittal to the EPA, air agencies are required to provide a “fee demonstration” to show that the fee schedules selected by the air agencies would result in the collection and retention of fees in an amount sufficient to meet the fee requirements of part 70.³⁰ The contents of the “fee demonstration” vary depending on the status of the air agency with respect to the “presumptive minimum”:

²⁵ See 40 CFR §§ 70.9(a), (b) and (c).

²⁶ The term “part 70 sources” is defined in 40 CFR § 70.2 to mean “any source subject to the permitting requirements of this part, as provided in 40 CFR §§ 70.3(a) and 70.3(b) of this part.” Thus, a source is a part 70 source prior to obtaining a part 70 permit if the source is subject to permitting under the applicability provisions of 40 CFR § 70.3.

²⁷ See 40 CFR § 70.9(a).

²⁸ See 40 CFR § 70.9(b)(1).

²⁹ CAA section 502(b)(3)(A).

³⁰ See the fee demonstration requirements at 40 CFR §§ 70.9(c) and 70.9(d) and the EPA’s November 1993 memo, *Title V Fee Demonstration and Additional Fee Demonstration Guidance* (“fee demonstration guidance”), on preparing fee demonstrations for the initial part 70 program submittal. See 40 CFR § 70.9(c), (d).

- Air agencies with fee schedules that would result in fees above the “presumptive minimum” are required to submit a “presumptive minimum program cost” demonstration showing that the expected fee revenue would in fact be above the “presumptive minimum”³¹ and also provide an “initial accounting”³² to show that fees would be used solely to cover part 70 program costs.
- Air agencies with fee schedules that would result in fees below the “presumptive minimum” are required to submit a “detailed accounting”³³ showing that the expected fee revenue would still be sufficient to cover part 70 program costs and an “initial accounting”³⁴ to show that the required fees would be used solely to cover part 70 program costs.

Also, as part of the initial program submittal, part 70 requires the submittal of several additional elements with respect to program costs.³⁵

Detailed accounting. After program approval, a “detailed accounting” that permit fees are collected and retained in an amount sufficient to cover all reasonable direct and indirect costs is required in the following two circumstances:³⁶

- When an air agency sets a fee schedule that would result in an amount less than the “presumptive minimum,”³⁷ or
- When the EPA determines—based on comments rebutting the presumption or its own initiative—that there are serious questions regarding whether the fee schedule is sufficient to cover costs.

A “detailed accounting” for an approved part 70 program would be based on data on fee revenue and program costs. The level of detail required in the “detailed accounting” remains at the discretion of the EPA and will depend on circumstance-specific factors related to the air agency being evaluated.³⁸

Periodic updates. After program approval, the EPA may require “periodic updates”³⁹ to the “initial accounting” element of the fee demonstration to confirm that required fees are being used solely to cover part 70 costs. A “periodic update” for an approved part 70 program is based on

³¹ This fee demonstration is referred to as the “presumptive minimum program cost” demonstration in Sections 1.1 and 3.2 of the EPA’s November 1, 1993, memo, *Title V Fee Demonstration and Additional Fee Demonstration Guidance* (“*fee demonstration guidance*”).

³² See 40 CFR § 70.9(d).

³³ See 40 CFR § 70.9(d)(5) and an example “detailed accounting” in Section 2.0 of the fee demonstration guidance.

³⁴ See, e.g., 40 CFR § 70.4(b)(8)(v).

³⁶ See the “detailed accounting” requirements at 40 CFR § 70.9(b)(5)(1).

³⁷ The calculation of the “presumptive minimum” is provided in 40 CFR §§ 70.9(b)(2)(i) through (v).

³⁸ See the fee demonstration guidance, Section 2.0, for an example “detailed accounting.”

³⁹ See the “periodic update” provision at 40 CFR § 70.9(d).

records showing that required fee revenue is actually being retained and used to cover the reasonable direct and indirect costs of the part 70 program.

Example annual financial reporting form. Attachment C of this title V evaluation guidance is an example annual financial reporting form for part 70. This tool may be used to help track the collection of fee revenue, program costs, and the presumptive minimum fee amount for a particular air agency. Attachment C also includes helpful explanations of common accounting terms used for part 70 purposes. This example annual financial reporting form represents one way to collect the information previously described and is not required by part 70 for any particular oversight activity.

V.iii Identification of Financial and Accounting Expertise for Fee Reviews

The OIG Report requested that the EPA explain how to leverage financial or accounting expertise to assist with fee evaluations. Historically, the EPA staff with scientific, engineering, or similar technical degrees or experience are tasked with air agency program and fee evaluations.

A recommended best practice is to seek the assistance of existing EPA staff with governmental accounting, financial, or economics expertise, who work outside of the part 70 program (e.g., staff involved in grants administration or in determining the economic penalty of noncompliance for civil penalty assessment) to assist with fee evaluations as needed. One way for the EPA to seek internal assistance for fee evaluations would be to offer a formal detail opportunity (a temporary reassignment for a set period of time) for a financial or accounting professional to work on part 70 evaluations. Another way to seek internal EPA assistance would be to use the EPA's Skills Marketplace.⁴⁰

EPA staff without financial or accounting expertise who want to become familiar with state, local, or tribal financial and accounting standards and practices may consider reviewing governmental accounting guidance issued by the national accounting standards board (e.g., the Governmental Accounting Standards Board (GASB)) and financial or audit reports generated by the air agency. Financial or accounting audit reports generated by the air agency may also provide useful data, address emerging issues with the part 70 program, or confirm that known fee issues are being addressed.

Financial or accounting guidance. The primary focus of part 70 fee evaluations is to review whether the air agency's fee program is being implemented consistent with part 70 requirements (see Section II of this guidance, *Summary of Title V Requirements for Air Agencies*). The focus of fee evaluations under part 70 is different from the focus of typical financial or accounting "audits" (as that term is used in the accounting profession).⁴¹ Attachment B of this guidance

⁴⁰ The Skills Marketplace is a component of the EPA's recently launched Talent Hub Portal SharePoint site located at: https://usepa.sharepoint.com/sites/OA_Applications/TalentHub/smp/SitePages/Home.aspx.

⁴¹ In the accounting profession, the primary purpose of an audit is to verify that financial statements of governmental or private entities are consistent with specific accounting criteria.

includes several examples of governmental accounting or financial guidance and other resources that may be useful for technical staff to build expertise in these areas.

Financial or accounting audit reports generated by air agencies. Audit reports or financial reports prepared by air agencies for their own accounting, budgeting, or oversight purposes may include useful background information for fee evaluations, including caseload statistics, historical funding patterns, funding sources, and identification of program performance issues. The GASB requires air agencies to prepare annual financial reports to determine compliance with their budgetary requirements or finance-related requirements. Most air agencies follow these requirements through review of financial reports by an auditor, with preparation of the reports by the air agency budget office, legislature, or by the department itself. Most air agencies also require local programs to be audited for submittal to the state auditor. These financial audits are typically conducted at the departmental level, but part 70 data may be available upon request. Such reports are not required by the EPA, but, if available and timely, they may provide useful information for program or fee evaluations.

ATTACHMENT A

Evaluation Checklist for 40 CFR Part 70

Regardless of the type of evaluation being conducted (program, fee, or combination of the two), the EPA describes the evaluation process as consisting of two phases: 1) Information and Data Gathering Phase and 2) Evaluation Report Phase, each of which is composed of several recommended steps. The requirement of the EPA's national program manager guidance ("NPM guidance") for fiscal years 2018 and 2019 is for part 70 evaluations to be completed within 1 year.¹ The checklists in Tables 1 and 2 describe the phases, recommended steps, and timeframes for each phase and step, leading to completion of the evaluation process within the 1-year timeframe.

The EPA Regions may revise this checklist to meet their needs. For example, the column for recommended duration could be replaced with expected dates for completion of each step for planning purposes, and steps that do not apply for a specific evaluation could be deleted. The column for comments could be used to document reasons why expected timeframes were not met or other relevant information concerning implementation of a step.

Information and Data Gathering Phase

An EPA letter requesting certain information from the air agency, and the air agency's response is the first phase of the evaluation process. The recommended best practice for this phase is that it takes no longer than 160 days. Recommended steps and durations for the steps are listed in Table 1.

Evaluation Report Phase

Drafting and finalization of the evaluation report is the second phase of the evaluation process. The recommended timeframe for this phase is 205 days. Specific steps and a recommended duration for each step are listed in Table 2.

¹ *Final FY 2018 - 2019 OAR National Program Manager Guidance*, U.S. EPA, Publication Number 440P1 7002 (September 29, 2017) (NPM guidance) located at <https://www.epa.gov/sites/production/files/2017-09/documents/fy18-19-oar-npm-guidance.pdf>.

Table 1: Information and Data Gathering Phase Checklist
(It is recommended that this phase take no more than 160 days.)

Description	Recommended Duration	Checklist	Comments
The Region drafts a checklist and sends an information request letter to the state, local or tribal agency (“air agency”).	No longer than 40 days.	<input type="checkbox"/> Start drafting letter and checklist:aaa ____/____/____ <input type="checkbox"/> Letter transmitted:aaa ____/____/____	
Air agency responds to questions in writing.	No longer than 120 days. [†] This phase should be completed within 80 days of project initiation.	<input type="checkbox"/> Air agency response received:aaa ____/____/____	

[†] The scope of the evaluation and sophistication of the data collection systems employed by the air agency will inform the time needed for this step.

Table 2: Program and/or Fee Evaluation Report Phase Checklist
(It is recommended that this phase take no more than 205 days.)

Description	Recommended Duration	Checklist	Comments
The Region reviews the air agency response and drafts evaluation report. EPA HQ consultation as needed.	No longer than 60 days.	<input type="checkbox"/> Regional review of air agency response <input type="checkbox"/> Consultation with HQ (as needed) Date step completed: ____/____/____	
The EPA and the air agency meet to discuss results (optional).	No longer than 30 days after draft report available.	<input type="checkbox"/> EPA & air agency meeting to discuss results: ____/____/____	
EPA Regional management briefed on draft report; copy provided to air agency for comment (optional).	No longer than 50 days. ^{††}	<input type="checkbox"/> EPA management briefing: ____/____/____ <input type="checkbox"/> Draft report sent for comment: ____/____/____	
Air agency responds to draft report with comments (optional).	No more than 30 days.	<input type="checkbox"/> Air agency response received: ____/____/____	
The EPA releases final version of evaluation report.	No more than 35 days. [‡]	<input type="checkbox"/> Final evaluation report released: ____/____/____	

^{††} If an air agency will not be providing comments on the report, the EPA Region could issue the final report by the end of this step or 140 days.

[‡] Some air agencies may request that the EPA also release the air agency's response with the release of the final evaluation report. The EPA recommends that Regions include such responses in their final reports, when practicable.

ATTACHMENT B

Resources

This is a list of resources where users can find additional information related to the requirements and issues discussed in this document.

Part 70 Monitoring Requirements

- aaSource Monitoring Guidance:aaa

- aaMonitoring Knowledge Base: *<http://cfpub.epa.gov/oarweb/mkb/>*.

- aaCompliance Assurance Monitoring: *<http://www3.epa.gov/ttn/atw/cam/ricam.html>*.iii

- aaEmissions Measurement Center: *<http://www3.epa.gov/ttn/emc/>*.

- aaPreconstruction Review:aaa

- aaFor EPA resources concerning preconstruction review permitting, seeiii
<http://www2.epa.gov/nsr>.

- aaFor EPA guidance memos on preconstruction review, seeiii
<https://www.epa.gov/nsr/new-source-review-policy-and-guidance-document-index>.

EPA Responses to Part 70 Petitions (EPA Orders)

- aa SeeiEPA responses and petitions at *<https://www.epa.gov/title-v-operating-permits/title-v-petition-database>*.

Greenhouse Gas Permitting Requirements

- aa October 23, 2015a Standards of Performance for Greenhouse Gas Emissions From New,aaa Modified, and Reconstructed Stationary Sources: Electric Utility Generating Units, Finalaaa Rule: *<https://www.gpo.gov/fdsys/pkg/FR-2015-10-23/pdf/2015-22837.pdf>*.

Guidance on Government Accounting Standards

- **Handbook of Federal Accounting Standards and Other Pronouncements, as Amended, as of June 30, 2015, Federal Accounting Standards Advisory Board (FASAB Handbook):**
http://www.fasab.gov/pdf/files/2015_fasab_handbook.pdf
 - **Statement of Federal Financial Accounting Standards 4: *Managerial Cost Accounting Standards and Concepts*, page 396 of the FASAB Handbook (June 2015) (“SFFAS No. 4”).**
 - **Statement of Federal Financial Accounting Standards 7: *Accounting for Revenue and Other Financial Sources and Concepts for Reconciling Budgetary and Financial Accounting*, page 592 of the FASAB Handbook (June 2015) (“SFFAS No. 7”).**
- **Statements of the Governmental Accounting Standards Board (GASB Statements):**
<http://www.gasb.org/cs/ContentServer?c=Page&pagename=GASB%2FPage%2FGASBSectionPage&cid=1176160042391>
 - **Statement No. 33, *Accounting and Financial Reporting for Nonexchange Transactions* (December 1998) (“GASB Statement No. 33”):**
http://www.gasb.org/jsp/GASB/Document_C/GASBDocumentPage?cid=1176160029148&acceptedDisclaimer=true
 - **Statement No. 34, *Basic Financial Statements – and Management’s Discussion and Analysis – for State and Local Governments* (June 1999) (“GASB Statement No. 34”):**
http://www.gasb.org/jsp/GASB/Document_C/GASBDocumentPage?cid=1176160029121&acceptedDisclaimer=true
- **Examples of air agency financial or performance audit reports:**
 - **Accountability, *New York State Department of Environmental Conservation, Report of Title V Operating Permit Program Revenues, Expenses and Changes in Fund Balance for the Two Fiscal Years Ended March 31, 2009*, Report Number 2010-S-61. Accessed January 19, 2017, at:**
www.osc.state.ny.us/audits/allaudits/093011/10s61.pdf
 - **State of Washington, Department of Ecology, *Air Operating Permit Program Report Fiscal Year 2014*. Publication Number 15-02-008. Accessed January 19, 2017, at**
www.fortress.wa.gov/ecy/publications/documents/1502008.pdf
 - **State of North Carolina, Division of Air Quality, Department of Environment and Natural Resources, *Title V Air Quality Permit Program Accountability Report*, November 2009. Accessed January 19, 2017, at:**
www.ncleg.net/documents/sites/committees/ERC/ERC%20Reports%20Received/2009/Dept%20of%20Environment%20and%20Natural%20Resources/2009-Nov%20-%20TitleV%20Air%20Quality%20Permit%20Program.pdf

List of EPA Guidance on Part 70 Fee Requirements

- January 1992a– *Guidelines for Implementation of Section 507 of the Clean Air Act* Amendments – Final Guidelines, U.S. EPA, Office of Air Quality Planning and Standards (OAQPS), U.S. EPA. See pages 5 and 1-12 concerning fee flexibility for small business stationary sources:
<http://www.epa.gov/sites/production/files/2015-08/documents/smbus.pdf>.iii
- July 7, 1993a– *Questions and Answers on the Requirements of Operating Permit Program* Regulations, U.S. EPA. See Section 9 at page 9-1: a a
http://www.epa.gov/sites/production/files/2015-08/documents/bbrd_qa1.pdf.iii
- August 4, 1993a– *Reissuance of Guidance on Agency Review of State Fee Schedules for Operating Permit Programs Under Title V*, John S. Seitz, Director, OAQPS, U.S. EPA to Air Division Directors, Regions I, II, III, IV, V, VI, VII, VIII, IX, and X (“1993 fee schedule guidance”). Note that there was an earlier document on this subject that was superseded by this document:
<http://www3.epa.gov/ttn/naaqs/aqmguide/collection/t5/fees.pdf>.iii
- August 9, 1993a– *Acid Rain-Title V Guidance on Fees and Incorporation by Reference*, Brian J. McLean, Director, Acid Rain Division, U.S. EPA to Air, Pesticides, and Toxics Division Directors, Regions I, II, III, IV, V, VI, VII, VIII, IX, and X and Air and Radiation Division Director, Region V:
<http://www.epa.gov/sites/production/files/2015-08/documents/combo809.pdf>.iii
- September 23, 1993 – *Matrix of Title V-Related and Air Grant-Eligible Activities*, OAQPS, U.S. EPA, The matrix notes that it is to be read and used in concert with the August 4, 1993 fee schedule guidance (“matrix guidance”):
<http://www.epa.gov/sites/production/files/2015-08/documents/matrix.pdf>.
- October 22, 1993a– *Use of Clean Air Act Title V Permit Fees as Match for Section 105 Grants*, Gerald M. Yamada, Acting General Counsel, U.S. EPA to Michael H. Shapiro, Acting Administrator, Office of Air and Radiation, U.S. EPA:aaa
[http://yosemite.epa.gov/oar/eab_web_docket.nsf/filings%20by%20appeal%20number/957aaac8b03e0cca0852574b0005aa688/\\$file/additional%20filing%20%20no.il%20...22.pdf](http://yosemite.epa.gov/oar/eab_web_docket.nsf/filings%20by%20appeal%20number/957aaac8b03e0cca0852574b0005aa688/$file/additional%20filing%20%20no.il%20...22.pdf).iii
- November 11, 1993 – *Title V Fee Demonstration and Additional Fee Demonstration Guidance*, John S. Seitz, Director, OAQPS, U.S. EPA to Director, Air, Pesticides and Toxics Management Division, Regions I and V, Director, Air and Waste Management Division, Region I, Director, Air, Radiation and Toxics Division, Region II, Director, Air and Radiation Division, Region V, Director, Air, Pesticides and Toxics Division, Region VI, Director, Air and Toxics Division, Regions VII, VIII, IX, and X (“fee demonstration guidance”):
<http://www3.epa.gov/ttn/naaqs/aqmguide/collection/t5/feedemon.pdf>.iii

- July 21, 1994 – *Transition of Funding Portions of State and Local Air Programs with Permit Fees Rather than Federal Grants*, Mary D. Nichols, Assistant Administrator for Air and Radiation, U.S. EPA Regional Administrators, Regions 4 – X: <http://www.epa.gov/sites/production/files/2015-08/documents/grantmem.pdf>.
- August 28, 1994 – *Additional Guidance on Funding Support for State and Local Programs*, Mary D. Nichols, Assistant Administrator for Air and Radiation, U.S. EPA Regional Administrators, Regions 4 – X (“additional guidance memo”): <http://www.epa.gov/sites/production/files/2015-08/documents/guidline.pdf>.
- January 23, 1996 – Letter from Conrad Simon, Director, Air & Waste Management Division, U.S. EPA Regional Administrator to Mr. Billy J. Sexton, Director, Jefferson County Department of Planning and Environmental Management, Air Pollution Control District, Louisville, Kentucky (“Sexton memo”): https://www.epa.gov/sites/production/files/2016-04/documents/sexton_1996.pdf.
- January 1997 – *Overview of Clean Air Title V Financial Management and Reporting – A Handbook for Financial Officers and Program Managers*, Environmental Finance Center, University of Maryland, Maryland Sea Grant College, University of Maryland. Supported by a grant from the U.S. EPA (“financial manager’s handbook”): <http://www.epa.gov/sites/production/files/2015-08/documents/t5finance.pdf>.
- October 23, 2015 – *Standards of Performance for Greenhouse Gas Emissions from New, Modified and Reconstructed Stationary Sources: Electric Utility Generating Units: Final Rule* (80 FR 64510). See Section XII.E, “Implications for Title V Fee Requirements for GHGs” at page 64633: <http://www.gpo.gov/fdsys/pkg/FR-2015-10-23/pdf/2015-22837.pdf>.
- March 27, 2018 – *Updated Guidance on EPA Review of Fee Schedules for Operating Permit Programs Under Title V*, Peter A. Sirigotis, Director, OAQPS, U.S. EPA, Regional Air Division Directors, Regions 4 – 10 (“updated fee schedule guidance”): <https://www.epa.gov/title-v-operating-permits/title-v-operating-permit-policy-and-guidance-document-index>.

ATTACHMENT C

Example Annual Financial Data Form for 40 CFR Part 70

Permitting Authority: _____

Annual Period: ____/____/____ to ____/____/____ (MM/DD/YYYY)

Annual Program Revenue		
A	Total Program Revenue (Fees Paid by Part 70 Sources)	\$ _____
Annual Presumptive Minimum Cost Calculation		
B	Total Emissions of "Regulated Pollutants (for presumptive fee calculation)"	_____ tons
C	Presumptive Minimum Fee Rate During Period (\$/ton)	\$ _____ per ton
D	Total Greenhouse Gas (GHG) Cost Adjustments (as applicable)	\$ _____
E = (B*C)+D	Presumptive Minimum Cost for the Program	\$ _____
A < E or A ≥ E	Compare Total Program Revenue to Presumptive Minimum Cost Enter: "Less Than" or "Greater Than" or "Equal To"	_____
Annual Program Costs		
F	Direct Labor Costs ¹	\$ _____
G	Other Direct Costs ²	\$ _____
H = F+G	Total Direct Costs	\$ _____
I	Known Indirect Costs ³	\$ _____
J = K*L	Calculated Indirect Costs ⁴	\$ _____
K	Indirect Rate	_____ %
L	Total Cost Base for the Part 70 Program	\$ _____
M = I or J	Total Indirect Costs	\$ _____
N = H+M	Total Program Costs	\$ _____
O = A - N	Annual Operating Result (Report deficits in parentheses)	\$ _____

¹ This is the sum of all direct labor costs, including regular payroll, overtime payroll, leave, fringe, and any other administrative surcharges.

² This is the sum of all other direct costs, including travel, materials, equipment, contractor, and any other costs directly allocable to the part 70 program.

³ Indirect Costs may either be known or calculated. If known, enter on this row; if calculated, skip to the next three rows.

⁴ If Indirect Costs are calculated, enter the result here, and enter the rate and base below. Accounting or budgeting personnel may be able to provide additional information on or assistance with calculating Indirect Costs.

Program Balance of Accounts (Report deficits in parentheses)		
P	Beginning of Year Balance ⁵	\$
Q = O	Annual Operating Result	\$
R	Fee Revenue Transferred In (describe in comments)	\$
S	Non-Exchange Revenue Transferred In (describe in comments)a- Informational Only	\$
T	Fee Revenues Transferred Out (describe in comments)	\$ ()
U = O+Q+R-T	End of Year Balance	\$

COMMENTS:

Use this section to describe any changes in accounting methods or program elements that affect the fee program, categories of revenue or expenses that do not fit into any of the listed categories or apply across multiple categories, transfers in or out, or any unusual activities or circumstances relevant to fees administration. Attach additional pages if needed.

⁵ This is the prior year's "End of Year Balance."

BACKGROUND – EXAMPLE ANNUAL FINANCIAL DATA FORM FOR PART 40 CFR 70

The Example Annual Financial Data Form is a tool that may be used to collect information from state, local, or tribal (“air agencies”) part 70 programs concerning their compliance with part 70 requirements for fees. The use of this form is not required for any specific air agency or time period and it may be revised as appropriate. Air agencies may find this form useful for collecting programmatic information for their own internal tracking purposes.

Fee sufficiency.^aThe primary purpose of the revenue, costs, and balance of accounts sections of the financial data form is to collect information concerning the sufficiency of fees, consistent with Clean Air Act (Act)§ 502(b)(3)(A) and 40 CFR § 70.9(a). The fee sufficiency requirements include requirements for air agencies to collect annual fees (or the equivalent over some other period) that are sufficient to cover all reasonable direct and indirect costs of the program and to track if required fees are being

6

diverted for non-part 70 purposes.^{aaaa}

Presumptive minimum.^aA secondary use for the financial data form is to assess an air agency’s status with respect to the “presumptive minimum” of part 70.⁷ This assessment may have been important when an air agency was originally approved to collect above the “presumptive minimum,” but changes made over time have resulted in total annual fees being collected that are less than the “presumptive minimum.”⁸ This assessment is important because 40 CFR § 70.9(b)(3) requires air agencies that collect less than the presumptive minimum to submit a “detailed accounting” to ensure fee sufficiency, and air agencies that were originally approved to collect at least the presumptive minimum would not have submitted the detailed accounting with the program submittal. Examples of cases where an air agency’s status in this respect may have changed include where the air agency uses a formula to calculate the presumptive minimum that is outdated or inconsistent with 40 CFR § 70.9(b)(2) or where the program was approved to charge fees to individual sources using the methodology for calculating the presumptive minimum pursuant to 40 CFR § 70.9(b)(2) and the air agency’s requirements for fee payment from individual sources are outdated or inconsistent with the part 70 calculation.⁹

The EPA may use its discretion to decide when this form should be completed by an air agency and which sections of the form should be completed. The EPA will evaluate any information submitted and determine appropriate next steps.

⁶ The requirements that fees be sufficient to cover all reasonable direct and indirect program costs, and that such fees not be diverted for other purposes, applies to all title V permit programs, regardless of whether or not the program was approved to collect “not less than” or “less than” the presumptive minimum.

⁷ The presumptive minimum of CAA§ 502(b)(3)(B) and 40 CFR § 70.9(b)(2) is generally calculated by multiplying a dollar per ton rate (which is adjusted annually for increases in the Consumer Price Index) by the tons of “regulated pollutants (for presumptive fee calculation)” emitted by all part 70 sources in an air agency for a year (or equivalent period) and adding a “GHG cost adjustment,” which is a set dollar amount to reflect certain increased costs for permitting.

⁸ Air agencies have flexibility to charge fees to sources on any basis, including to charge emission fees, application fees, service-based fees, or other types of fees, regardless of whether or not the program was approved to collect “not less than” or “less than” the presumptive minimum.

⁹ The presumptive minimum calculation of 40 CFR § 70.9(b)(2) was updated in 2015 to add a GHG cost adjustment; see the final rule, *Standards of Performance for Greenhouse Gas Emissions from New, Modified and Reconstructed Stationary Sources: Electric Utility Generating Units; Final Rule* (80 FR 64510, October 23, 2015). See Section XI.E, “Implications for Title V Fee Requirements for GHGs” at page 64633:

<http://www.gpo.gov/fdsys/pkg/FR-2015-10-23/pdf/2015-22837.pdf>.

Accounting methods: The part 70 rules do not generally require any particular governmental accounting standards or tracking systems to be used by air agencies. However, part 70 contains certain requirements for tracking permit fees and program costs and for funding the program costs with permit fees that must be met by all air agencies, regardless of the accounting standards and tracking systems being used. Due to variability and changes in accounting standards, systems, and practices, it is important for air agencies to note changes that may affect part 70 fees, costs, and accounting practices in the comments section of this form.

The EPA recognizes the following resources may be helpful in understanding governmental accounting standards as they relate to part 70 programs:

- **aa Handbook of Federal Accounting Standards and Other Pronouncements, as Amended, as of June 30, 2015, Federal Accounting Standards Advisory Board (FASAB).**
http://www.fasab.gov/pdf/files/2015_fasab_handbook.pdf
- **Statement of Federal Financial Accounting Standards 4: *Managerial Cost Accounting Standards and Concepts*, page 396 of the FASB Handbook (June 2015) (“SFFAS No. 4”).**
- **Statement of Federal Financial Accounting Standards 7: *Accounting for Revenue and Other Financial Sources and Concepts for Reconciling Budgetary and Financial Accounting*, page 592 of the FASAB Handbook (June 2015) (“SFFAS No. 7”).**
- **aa Statements of the Governmental Accounting Standards Board (GASB):**
<http://www.gasb.org/jsp/GASB/Page/GASBSectionPage&cid=1176160042391#gasbs25>
- **Statement No. 33, *Accounting and Financial Reporting for Nonexchange Transactions* (December 1998) (“GASB Statement No. 33”):**
http://www.gasb.org/jsp/GASB/Document_C/GASBDocumentPage?cid=1176160029148&acceptedDisclaimer=true
- **Statement No. 34, *Basic Financial Statements – and Management’s Discussion and Analysis – for State and Local Governments* (June 1999) (“GASB Statement No. 34”):**
http://www.gasb.org/jsp/GASB/Document_C/GASBDocumentPage?cid=1176160029121&acceptedDisclaimer=true

Definition of terms: Several terms (e.g., “Direct Labor” and “Indirect Costs”) used in the Example Annual Financial Data Form are not defined in part 70. Some terms are defined in the EPA’s fee guidance (particularly the EPA’s updated fee schedule guidance¹⁰), in the U.S. Office of Management and Budget’s (OMB’s) Circular A-87 Revised (Cost Principles for State, Local, and Indian Tribal Governments), and in the FASB Handbook’s chapter on Managerial Cost Accounting Standards and Concepts (SFFAS No. 4), among other reference documents.

Supporting information: The information reported on this example form should be based on relevant supporting accounting information or documentation. Air agencies that complete the form for submittal to the EPA should maintain such supporting information for submittal to the EPA upon request.

¹⁰ *Updated Guidance on EPA Review of Fee Schedules for Operating Permit Programs Under Title V*, Peter Tsirigotis, Director, OAQPS, to Regional Air Division Directors, Regions I – 10, March 27, 2018, (updated fee schedule guidance).

INSTRUCTIONS – EXAMPLE ANNUAL FINANCIAL DATA FORM FOR PART 70

These instructions are a general explanation of how to complete the attached Example Annual Financial Data Form for Part 70 (“example financial form”). This form is not required to be submitted on any frequency by air agencies – it is simply a useful example of how an EPA Region may collect financial information related to title V fee requirements. The EPA Regions may revise this form to suit a particular air agency or may opt to only require certain sections be completed.

Annual Program Revenue

- **Total Program Revenue (Fees Paid by Part 70 Sources)(\$):** Include all title V fees paid directly by part 70 sources, including emission fees, application fees, and other fees under the air agency’s fee schedule.
 - The fees collected under a part 70 program are referred to as “Exchange Revenue” or “Earned Revenue” in governmental accounting guidance because a good or service is provided by a governmental entity (e.g., a permit) in exchange for a price (e.g., a permit fee).¹¹ Also, governmental accounting guidance provides that only revenue classified as “Exchange Revenue” should be compared against costs to determine the overall financial results of operations for a period.¹² This means that legislative appropriations, taxes, grants, fines, or penalties, which are generally characterized as “Non-Exchange Revenue,”¹³ should not be compared against costs to determine if fees are sufficient to cover part 70 program costs.
 - Some part 70 programs have direct access to permit fees to cover costs. However, other part 70 programs are required by state or local law to deposit permit fees into general accounts, with operating costs subject to legislative appropriation. In both scenarios, if the funds were originally paid as permit fees and used for part 70 purposes for the report year, the fees may be considered “Total Program Revenue” and entered as such on the example financial form. Permit fees that were retained in a prior year and transferred for use in the report year should be reported as “Funds Transferred In.”
 - Note that any non-part 70 fee revenue (“Non-Exchange Revenue”) should only be identified for informational purposes in the “Program Balance of Accounts” section of the example financial form, specifically the “Non-Exchange Revenue Transferred In” line.¹⁴

¹¹ See Statement of Recommended Accounting Standards Number 7, *Accounting for Revenue and Other Financing Sources and Concepts for Reconciling Budgetary and Financial Accounting*, issued by the Federal Accounting Standards Advisory Board (FASAB) (“FASAB No. 7”) at page 2. Also see Statement No. 33, *Accounting and Financial Reporting for Nonexchange Transactions* (December 1998), issued by the Governmental Accounting Standards Board (GASB) at pages 1-4. Conversely, “Non-Exchange Revenue” arises primarily from the exercise of governmental power to demand payment from the public (e.g., income tax, sales tax, property taxes, fines, and penalties) and when a government gives value directly without directly receiving equal value in return (e.g., legislative appropriations and intergovernmental grants).

¹² See FASAB No. 7 at page 8.

¹³ “Non-Exchange Revenue” arises primarily from the exercise of governmental power to demand payment from the public (e.g., income tax, sales tax, property taxes, fines, and penalties) and when a government gives value directly without directly receiving equal value in return (e.g., legislative appropriations and intergovernmental grants).

¹⁴ Since “Non-Exchange Revenue” is not allowed to be counted as part 70 fees, they should not be compared to costs or carried over to the “Beginning of Year Balance” or “End of Year Balance” lines.

Annual Presumptive Minimum Calculation

This section helps to determine if an air agency's status is considered to be "presumptively adequate" to fund program costs for a year.¹⁵ This determination is relevant to part 70 when an air agency's fee schedule was approved to be above the "presumptive minimum," but due to changes over time, it is now collecting and retaining fee revenue below the "presumptive minimum." When such a change occurs, 40 CFR § 70.9(b)(5) requires the air agency to submit a "detailed accounting" to show that its fees are sufficient to cover the part 70 program costs.

- **Total Emissions of "Regulated Pollutants (for presumptive fee calculation)" (tons/year):** Report the actual emissions of "Regulated Pollutants (for presumptive fee calculation)," as the term is defined in 40 CFR § 70.2, for all part 70 sources for the year. Also *see* 40 CFR § 70.9(b)(2)(ii) and (iii) for additional information on emissions that may be excluded from the total. The EPA sometimes refers to these emissions as "Fee Pollutants" since they are only used for fee purposes.
- **Presumptive Minimum Fee Rate During Period (\$/ton):** The EPA calculates the "Presumptive Minimum Fee Rate" (\$/ton) for part 70 in September of each year, and the fee rate is effective from September 1 through August 31 of the following year. The EPA publishes the fee rate on the EPA's title V permit website.¹⁶ If a part 70 program uses a different 12-month period, then the fee rate in effect at the beginning of the reporting period or an average fee rate (prorated by month) may be used.
- **Total Greenhouse Gas (GHG) Cost Adjustments, as applicable (\$):** A final rule published October 23, 2015, included a "GHG Cost Adjustment," which is part of the calculation of the "presumptive minimum" for an air agency under part 70.¹⁷ The adjustment is intended to reflect the increased costs of permitting GHGs for part 70 programs.
- **Presumptive Minimum Cost for the Program (\$):** To determine the total "presumptive minimum" for an air agency, multiply the actual emissions of "Regulated Pollutants (for presumptive fee calculation)" by the "Presumptive Minimum Fee Rate" and add the "GHG Cost Adjustment" (as applicable) for the period.
- **Compare Revenue to Presumptive Minimum Cost:** Compare the "Total Program Revenue" to the calculated "Presumptive Minimum Cost for the Program" to determine if the fee revenue has fallen below the "Presumptive Minimum." If the total program revenue is lower, a "detailed accounting" is required to show that fee revenue is sufficient to cover the program costs.¹⁸

¹⁵ *See* 40 CFR § 70.9(b)(2)(i) through (v) for more on the "presumptive minimum."

¹⁶ *See* <https://www.epa.gov/title-v-operating-permits/permit-fees>.

¹⁷ *See* 80 FR 64659 and 40 CFR §§ 70.9(b)(2)(i) and § 70.9(b)(2)(v) concerning the "GHG cost adjustment" for part 70.

¹⁸ *See* 40 CFR § 70.9(b)(5).

Annual Program Costs

The full cost of a part 70 program is described in accounting terms as being comprised of all reasonable “direct and indirect costs.” To assess the full cost, one should assess the total resources used to conduct a program or complete an activity under a program. Full cost includes all “direct and indirect costs,” regardless of funding sources. “Indirect costs” exist whether or not the program exists, while “direct costs” exist only if the program exists. If, by eliminating the program, a particular cost is eliminated, then the cost is labeled a “direct cost.”

Examples of “Direct Labor Costs,” “Other Direct Costs,” and “Indirect Costs” are provided below. It is beyond the scope of this example financial form to include a review of whether all part 70 program activities described in the separate updated fee schedule guidance¹⁹ are included in the “Direct and Indirect Costs;” however, such a review may be part of a “detailed accounting” or other EPA oversight activity.

- **Direct Labor Costs (\$):** Salary and wages for direct work on part 70, including for professional, administrative, and supervisory staff. These costs should include fringe benefits (compensation in addition to regular salary and wages). Also, include the portion of “Direct Labor Costs” not covered by employee contributions, such as those associated with employee contributions to insurance and retirement.
- **Other Direct Costs (\$):** Direct part 70 expenses, such as materials, equipment, professional services, official travel (i.e., food and lodging), public notice, public hearings, and contractors.
- **Indirect Costs (\$):** “Indirect Costs” are funds spent on general administration (sometimes referred to as overhead). For a part 70 program, this is a share of costs associated with managing the organization within which the permit program resides, represented through an “Indirect Rate.” For example, to the extent that a program resides within a larger office, the program may be charged a proportionate share of the overhead expense associated with the larger office. The budget or accounting office of the environmental division or department may be able to provide the indirect costs for part 70 or may be able to assist with determining them using one of the following methods:
 - **Known Indirect Costs (\$):** This is the known value of “Indirect Costs” for a part 70 program, such as may be provided by an air agency budget or accounting office.
 - **Calculated Indirect Costs (\$):** If the “Indirect Costs” are not known, then multiply an “Indirect Rate” (e.g., a percentage that represents a fraction of total costs that are indirect costs) by a known “Total Cost Base” (either “Total Costs” or “Total Labor Costs” for the part 70 program) to calculate “Indirect Costs.” If calculated in this manner, the “Indirect Rate” and the “Total Cost Base” should be included on the example financial form.
- **Annual Operating Result (\$):** The difference between the “Total Program Revenue” and “Total Program Costs” reveals the degree to which the program generated a surplus, deficit, or breaks even. If costs exceed fee revenue, then there was a deficit. If fee revenue exceeds costs, then there was a surplus. Deficits should be reported in parentheses to indicate a negative number.

¹⁹ See *Updated Guidance on EPA Review of Fee Schedules for Operating Permit Programs Under Title V*, Peter Tsirigotis, Director, OAQPS, to Regional Air Division Directors, Regions 1 – 10, March 27, 2018 (updated fee schedule guidance).

Program Balance of Accounts

This section of the example financial form shows the program's overall fiscal status over time based on the balance at the beginning of the period, changes in account balances from operations, fund transfers, and resulting year-end balance.

- **Beginning of Year Balance (\$)**: The net balance (surplus or deficit) at the beginning of the year. If unknown, enter zero. This is the prior year's "End of Year Balance."
- **Annual Operating Result (\$)**: The amount of fees minus costs for the year. If negative, include in parentheses to indicate a deficit for the year.
- **Fee Revenue Transferred In (\$)**: Permit fee revenue not already accounted for above that is transferred from other accounts, such as fee revenue that was collected and retained in prior years used to cover costs for this year. Enter the amount of fee revenue and describe the source of funds in the comments section (e.g., permit fees retained in prior years) and whether the transfers are temporary (e.g., one-time) or permanent (e.g., recurring). If the funds originated as permit fees for the year being reported, enter the amount on the "Total Program Revenue" line, rather than this line.
- **Non-Exchange Revenue Transferred In (\$)**: Non-Exchange Revenue (e.g., grants, taxes, penalties, fines, and similar) transferred in to cover program costs. Enter the amount here and describe the source of funds in the comments section. This line is for information only and will not be included in any calculations of permit fee revenue on this form.
- **Fee Revenue Transferred Out (\$)**: Permit fee revenue transferred out of program accounts during the report year. In the comments section, describe the intended use of the funds and whether the transfer is permanent or temporary. If you intend to use the fees in future years for the part 70 program, please indicate so in comments. If not, please describe the intended use of funds and whether the fees are in excess of the costs for the year. Any such transfers out will be subject to a close scrutiny by the EPA.
- **End of Year Balance (\$)**: The net balance (surplus or deficit) at the end of the year. In the comments section, please describe any steps that will be taken to address a significant deficit, if known or available.

EXAMPLES OF TYPICAL DIRECT AND INDIRECT COSTS

The following examples are intended to help permitting staff understand how various types of costs would be categorized for accounting purposes. For a complete list of part 70 program activities that should be included as part 70 costs, *see* the EPA's separate updated fee schedule guidance.

Direct Costs:

"Direct Costs" consists of two categories: 1) "Direct Labor Costs" and 2) "Other Direct Costs."

●aa Examples of Direct Labor Costs:

- Cost of "direct labor";aa
- Fringe benefits (i.e., retirement, health insurance, and life insurance); andaa
- Leave, holiday, overtime and premium pay, and other personnel costs.aa

●aa Examples of Other Direct Costs:

- Equipment purchases; andaa
- Miscellaneous items, such as supplies and materials, equipment rentals, travel, purchased services such as printing, and contractual services.aa

Indirect Costs:

"Indirect Costs" can be thought of as the time spent on administrative support and other office expenses, which are not solely related to the program's operation because they benefit multiple programs or cost objectives, but are needed to operate a part 70 program.

●aa Examples of Indirect Costs:aa

- Space rental, utilities, including telephones;aa
- Administrative support related to an office's overall mission, including such costs as procurement, contracting, office services, property management, vehicle management, supply, finance, payroll, voucher processing, personnel services, records management, and document control;aa
- Miscellaneous supplies and materials, including postage;aa
- Data processing, management, and control;aa
- Equipment rentals and costs;aa
- Training and development;aa
- Budget development, planning, and coordination;aa
- Public information and inquiries;aa
- Safety management, including inspection, training, and promotion;aa
- Recurring reports, such as accounting or property reports; andaa
- Unemployment Compensation, Equal Employment Opportunity Office costs and otheraa affirmative action program costs.aa

DETERMINING THE PROPORTIONAL SHARE OF INDIRECT COSTS

When “Indirect Costs” are not known, they can be calculated through the use of an “Indirect Rate.” Generally, an “Indirect Rate” is calculated by dividing total “Indirect Costs” by total “Direct Costs.” Because air agency accounting methods vary, the indirect and direct costs can be for all environmental programs, the environmental department or division, or the air program. The resulting “Indirect Cost Rate” is the percentage of “Total Costs” that are “Indirect Costs.” The resulting “Indirect Rate” is then multiplied by the “Total Cost Base,” which may be either “Total Direct Labor Costs” or “Total Costs” for part 70, as shown below.

$$\text{Indirect Cost Rate} = \frac{\text{Total Indirect Costs}}{\text{Total Direct Costs}}$$

$$\text{Calculated Indirect Costs} = \text{Indirect Cost Rate} * \text{Total Direct Labor Costs for Part 70}$$

or

$$\text{Calculated Indirect Costs} = \text{Indirect Cost Rate} * \text{Total Costs for Part 70}$$

FOR MORE INFORMATION ON DETERMINING AIR AGENCY COSTS

For further information on determining costs for state, local, and tribal governments, see OMB Circular A-87 Revised, Cost Principles for State, Local and Indian Tribal Government (May 10, 2004) and OMB Circular A-133, Audits of State, Local Governments, and Non-Profit Organizations (last revised June 26, 2007). These guidance documents are not specific to part 70 but are generally useful for understanding costs for the purposes of the part 70 program.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

MAR 27 2018

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

MEMORANDUM

SUBJECT: Updated Guidance on EPA Review of Fee Schedules for Operating Permit Programs Under Title V

FROM: Peter Tsirigotis
Director

TO: Regional Air Division Directors, Regions 1 – 10

The attached guidance is being issued in response to the Environmental Protection Agency Office of Inspector General's (OIG) 2014 report regarding the importance of enhanced EPA oversight of state, local, and tribal¹ fee practices under title V of the Clean Air Act (CAA).² Specifically, this guidance reflects the EPA's August 22, 2014, commitment to the OIG in response to OIG's Recommendation 1 to "assess our existing fee guidance and to re-issue, revise, or supplement such guidance as necessary" (we refer to the attached guidance as the "**updated fee schedule guidance**"). The EPA's response to the OIG's other recommendations are being issued concurrently in a separate memorandum and guidance concerning title V program and fee evaluations ("title V evaluation guidance").³

Title V of the CAA and 40 CFR part 70 contain the minimum requirements for operating permit programs developed and administered by air agencies, including requirements that each program issue operating permits to certain facilities (facilities that are "major sources" of air pollution and certain other facilities) and that each program charge fees ("permit fees") to these facilities to fund the permit program. These operating permits are intended to identify all federal air pollution control requirements that apply to a facility ("applicable requirements") and to require the facility to track and report compliance pursuant to a series of recordkeeping and reporting requirements. Section 502(b)(3) of the CAA requires each air agency to collect fees "sufficient to cover all reasonable (direct and indirect) costs required to develop and administer" its title V permit program.⁴ The 40 CFR part 70 regulations establish the minimum program

¹ As used herein, the term "air agency" refers to state, local, and tribal agencies.

² *Enhanced EPA Oversight Needed to Address Risks from Declining Clean Air Act Title V Revenues*; U.S. EPA Office of the Inspector General. Report No. 15-P-0006, October 20, 2014 ("OIG Report").

³ *Program and Fee Evaluation Strategy and Guidance for 40 CFR Part 70*, Peter Tsirigotis, Director, Office of Air Quality Planning and Standards (OAQPS), U.S. EPA, to Regional Air Division Directors, Regions 1 – 10, March 27, 2018 ("title V evaluation guidance"). See the EPA's title V guidance website at <https://www.epa.gov/title-v-operating-permits/title-v-operating-permit-policy-and-guidance-document-index>.

⁴ 42 U.S.C. § 7661a(b)(3)(A).

requirements for operating permit programs, including requirements for fees to be administered by air agencies with approved part 70 programs.⁵

On August 4, 1993, the EPA issued a memorandum, commonly referred to as the “1993 fee schedule guidance,” to provide initial guidance on the Agency’s approach to reviewing fee schedules for part 70 programs.⁶ Since that time, the EPA has issued a number of memoranda and a final rule⁷ that have touched upon, revised, or clarified certain topics contained in the 1993 fee schedule guidance.⁸ The attached updated fee schedule guidance provides additional direction on how the EPA interprets the title V permit issuance and fee collection activities, as well as discussion of other fee requirements for air agencies. In addition to the memoranda and final rule noted above, the updated fee schedule guidance includes numerous changes to remove outdated regulatory provisions and focuses on the review of existing part 70 programs, rather than on initial program submittals.⁹

The updated fee schedule guidance sets forth updated principles, which will generally guide the EPA’s review of part 70 fee programs. These updates are consistent with the fee requirements of title V and part 70, as well as prior guidance on fee requirements. Accordingly, these updates do not themselves provide substantively new fee guidance or create any inconsistencies with fee requirements or prior fee guidance.

The development of this guidance included outreach and discussions with stakeholders, including the EPA Regions, the National Association of Clean Air Agencies, and the Association of Air Pollution Control Agencies.

If you have any questions concerning the updated fee schedule guidance, please contact Juan Santiago, Associate Director, Air Quality Policy Division, Office of Air Quality Planning and Standards, at (919) 541-1084 or santiago.juan@epa.gov.

Attachments:

1. Updated Guidance on EPA Review of Fee Schedules for Operating Permit Programs under Title V
2. Attachment A – List of Guidance Relevant to Part 70 Fee Requirements
3. Attachment B – Example Presumptive Minimum Calculation

⁵ 40 C.F.R. § 70.9.

⁶ See *Reissuance of Guidance on Agency Review of State Fee Schedules for Operating Permits Programs under Title V*, John S. Seitz, Director, OAQPS, U.S. EPA, to Air Division Directors, Regions I-X (August 4, 1993) (“1993 fee schedule guidance”) at page 1. Note that there was an earlier document on this subject that was superseded by the 1993 fee schedule guidance.

⁷ See the October 23, 2015, final rule, *Standards of Performance for Greenhouse Gas Emissions from New, Modified and Reconstructed Stationary Sources: Electric Utility Generating Units*, 80 FR 64510, 64633 (Section XII.E “Implications for Title V Fee Requirements for GHGs”).

⁸ A list of the relevant title V fee-related guidance memoranda is included as Attachment A.

⁹ At this time, all air agencies have EPA-approved part 70 programs. It is conceivable that additional part 70 program submittals will be received in the future for a number of Indian tribes, and, if so, the EPA will work closely with the tribes to assist them with identifying activities which must be included in costs related to the program submittal and to meet other fee requirements of part 70.

DISCLAIMER

These documents explain the requirements of the EPA regulations, describe the EPA policies, and recommend procedures for sources and permitting authorities to use to ensure that title V fee schedules and fee evaluations are consistent with applicable regulations. These documents are not a rule or regulation, and the guidance they contain may not apply to a particular situation based upon the individual facts and circumstances. The guidance does not change or substitute for any law, regulation, or any other legally binding requirement and is not legally enforceable. The use of non-mandatory language such as “guidance,” “recommend,” “may,” “should,” and “can,” is intended to describe the EPA policies and recommendations. Mandatory terminology, such as “must” and “required,” is intended to describe controlling requirements under the terms of the Clean Air Act and the EPA’s regulations, but the documents do not establish legally binding requirements in and of themselves.

Updated Guidance on EPA Review of Fee Schedules for Operating Permit Programs under Title V

The purpose of this document and the attachments is to provide guidance on the Environmental Protection Agency's (EPA's) review of fee schedules for operating permit programs under 40 CFR part 70 (part 70), the regulations that set minimum requirements for permit programs administered by state, local, and tribal air agencies (referred to here as, "air agencies") authorized under title V of the Clean Air Act (CAA or Act). This document updates and clarifies the previous fee schedule guidance issued by the EPA on August 4, 1993 (the "1993 fee schedule guidance").¹ This updated fee schedule guidance clarifies which permit program costs must be included in an analysis to demonstrate that adequate fees are collected to fund all part 70 program costs. The guidance also discusses other fee-related requirements for air agencies. The updated fee schedule guidance focuses on the costs of program implementation, rather than on the costs of initial program development (as was the case for the 1993 fee schedule guidance).

I. General Principles for Review of Title V Fee Schedules

Section 502(b)(3)(A) of the Act requires operating permit programs to fund all "reasonable direct and indirect costs" of the permit programs through fees collected from "part 70 sources"² and requires the fees to be sufficient to cover all reasonable permit program costs.³ The terms "fee schedule" and "permit fees" are sometimes used interchangeably to describe the fees that an air agency charges to part 70 sources to fulfill this requirement.⁴ Section II of this guidance provides an explanation of the term "direct and indirect costs" and a detailed explanation of specific permit program activities to be included in costs for the purpose of analyzing whether the permit fees are sufficient to cover all the permit program costs.

The fees collected under a part 70 program are classified as "exchange revenue" or "earned revenue" in governmental accounting guidance because a good or service (e.g., a permit) is provided by a governmental entity in exchange for a price (e.g., a permit fee).⁵ Also, governmental accounting guidance provides that only revenue classified as "exchange revenue" should be compared to costs to

¹ See *Reissuance of Guidance on Agency Review of State Fee Schedules for Operating Permits Programs under Title V*, John S. Seitz, Director, OAQPS, U.S. EPA, to Air Division Directors, Regions I-X (August 4, 1993) ("1993 fee schedule guidance").

² The term "part 70 sources" is defined in 40 CFR § 7.2 to mean "any source subject to the permitting requirements of this part, as provided in 40 CFR §§ 70.3(a) and 70.3(b) of this part." Thus, a source is a part 70 source prior to obtaining a part 70 permit if the source is subject to permitting under the applicability provisions of 40 CFR § 70.3.

³ See 40 CFR § 70.9(a).

⁴ The fee schedule is typically included in the regulations that the air agency uses to implement part 70; it is a component of the part 70 program. The fee schedule (and other elements of an air agency's regulations for part 70) can vary significantly across air agencies.

⁵ See Statement of Recommended Accounting Standards Number 7, *Accounting for Revenue and Other Financing Sources and Concepts for Reconciling Budgetary and Financial Accounting*, issued by the Federal Accounting Standards Advisory Board (FASAB) ("FASAB No. 7") at page 2. See also Statement No. 33, *Accounting and Financial Reporting for Nonexchange Transactions* (December 1998), issued by the Governmental Accounting Standards Board (GASB) at pages 1-4 ("GASB No. 33").

determine the overall financial results of operations for a period.⁶ This means that legislative appropriations, taxes, grants,⁷ fines and penalties, which are generally characterized as “nonexchange revenue,”⁸ should not be compared to part 70 program costs to determine if permit fees are sufficient to cover costs.

Any fee required by part 70 must “be used solely for permit program costs” (in other words, the fees must not be diverted for non-part 70 purposes).⁹ Many air agencies transfer fees that are in excess of program costs for a particular year into accounts to be used for part 70 purposes in another year when there is expected to be a fee shortfall, and this is an acceptable practice. However, if title V fees are transferred for uses not authorized by part 70 (e.g., highway maintenance or other general obligations of government), they would be considered improperly diverted.

Each air agency is required, as part of its part 70 program submittal, to submit a “fee demonstration” to show that its fee schedule would result in the collection and retention of fees sufficient to cover program costs, including an “initial accounting” to show that “required fee revenues” would be used solely to cover program costs.¹⁰

The EPA will generally presume that a fee schedule is sufficient to cover program costs if it results in the collection and retention of fees in an amount above the “presumptive minimum” —i.e., “an amount *not less than* \$25 per ton” adjusted annually for increases in the Consumer Price Index¹¹ “times the total tons of the actual emissions of each regulated air pollutant (for presumptive fee calculation) emitted from part 70 sources,” plus any greenhouse gas (GHG) cost adjustments, as applicable.¹² A fee schedule that is expected to result in fees above the “presumptive minimum” is considered to be “presumptively adequate.” Note that the “presumptive minimum” is unique to each air agency because the total tons of actual emissions of “regulated air pollutants (for presumptive fee calculation)” are unique to each air agency.

As part of a fee demonstration, air agencies with fee schedules that would not be presumptively adequate are required to submit a “detailed accounting” to show that collection and retention of fee

⁶ See FASAB No. 7 at page 8; GASB No. 33.

⁷ Concerning grants, an EPA memo, *Use of Clean Air Act Title V Permit Fees as Match for Section 105 Grants*, Gerald Yamada, Acting General Counsel, U.S. EPA, to Michael H. Shapiro, Acting Assistant Administrator, Office of Air and Radiation, U.S. EPA, October 22, 1993, states that part 70 fees are “program income” under 40 CFR § 31.25(a), and, because of this, part 70 fees cannot be used as match for section 105 grants and no air agency may count the same activity for both grant and part 70 fee purposes.

⁸ “Nonexchange revenue” arises primarily from the exercise of governmental power to demand payment from the public (e.g., income tax, sales tax, property taxes, fines, and penalties) and when a government gives value directly without directly receiving equal value in return (e.g., legislative appropriations and intergovernmental grants).

⁹ See 40 CFR § 70.9(a).

¹⁰ See 40 CFR §§ 70.9(c)-(d) (fee demonstration requirements); 1993 fee schedule guidance (explaining that preparing the fee demonstrations that is part of the initial part 70 program submittal).

¹¹ See CAA at § 502(b)(3)(B); 40 CFR § 70.9(b). The presumptive minimum fee rate is adjusted for increases in the Consumer Price Index each year in September. The fee rate for the period of September 1, 2016, through August 31, 2017, is \$48.88 per ton. For more information, including a list of historical adjustment to the fee rate, see <https://www.epa.gov/title-v-operating-permits/permit-fees>.

¹² See 40 CFR § 70.9(b)(2) (emphasis added). The components of the “presumptive minimum” calculation—including certain emissions that may be excluded from the calculation, and an upward “GHG cost adjustment” that may apply—are addressed in 40 CFR §§ 70.9(b)(2)(i)-(v).

revenue would be sufficient to cover program costs.¹³ Air agencies are also required to provide an “initial accounting” to show how “required fee revenues” will be used solely to cover permitting program costs.¹⁴ Air agencies with fee schedules considered “presumptively adequate” are nevertheless required to submit fee demonstrations,¹⁵ but they may be “presumptive minimum program cost” demonstration¹⁶ showing that expected fee revenues are above the “presumptive minimum” calculated for the air agency. In order to receive the EPA’s approval, any fee demonstration must provide an “initial accounting” showing how required fee revenues will be used solely to cover program costs.¹⁷

After an air agency fee program is approved by the EPA, there are several fee requirements that may apply to the permit program as circumstances dictate. One requirement is for an air agency to submit, as required by the EPA, “periodic updates” of the “initial accounting” portion of the fee demonstration to show how “required fee revenues” are used solely to cover the costs of the permit program.¹⁸ Further, an air agency must submit a “detailed accounting” demonstrating that the fee schedule is adequate to cover costs if an air agency changes its fee schedule to collect *less than* the presumptive minimum or if the EPA determines—based on the EPA’s own initiative, or based on comments rebutting a presumption of fee sufficiency—that there are serious questions regarding whether the fee schedule is sufficient to cover the costs.¹⁹

In addition, title V and part 70 provide general authority for the EPA to conduct oversight activities to ensure air agencies adequately administer and enforce the requirements for operating permits programs, including that the requirements for fees are being met on an ongoing basis.²⁰ One method the EPA uses to perform such oversight is through periodic program or fee evaluations of part 70 programs. As part of such an evaluation, the EPA may carefully review how the state has addressed the fee requirements of part 70 as previously described and work with the air agency to seek improvements or make corrections and adjustments if any fee concerns are uncovered. Also, as part of such an evaluation, the EPA may require “periodic updates” to a fee demonstration or a “detailed accounting” that fees are sufficient to cover permit program costs.²¹ See the EPA’s separate *Program and Fee Evaluation Strategy and Guidance for 40 CFR Part 70* (“title V evaluation guidance”) for more on this subject.²²

¹³ See 40 CFR § 70.9(b).

¹⁴ See 40 CFR § 70.9(d).

¹⁵ See 40 CFR § 70.9(c).

¹⁶ See Sections 1.1 and 3.2 of the fee demonstration guidance.

¹⁷ See 40 CFR § 70.9(d).

¹⁸ See 40 CFR § 70.9(d).

¹⁹ See 40 CFR § 70.9(b)(5); fee demonstration guidance, Section 2.0 (providing an example of a “detailed accounting”). The scope and content of a “detailed accounting” may vary but will generally involve information on program fees and costs and other accounting procedures and practices that will show how the air agency’s fee schedule will be sufficient to cover all program costs.

²⁰ See CAA § 502(i); 40 CFR § 70.10(b).

²¹ See 40 CFR §§ 70.9(a); 70.9(b)(1), (5)(ii).

²² *Program and Fee Evaluation Strategy and Guidance for 40 CFR Part 70*, Peter Tsirigotis, Director, Office of Air Quality Planning and Standards (OAQPS), U.S. EPA, to Regional Air Division Directors, Regions 1 – 10, March 27, 2018.

II.a Types of Costs and Activities Included in Title V Costs

A.a Overview

Activities that count as part 70 costs (direct and indirect costs of part 70). Part 70 uses the term “permit program costs” to describe the costs that must count for fee purposes under part 70.²³ This term is defined in 40 CFR § 70.2 as “all reasonable (direct and indirect) costs required to develop and administer a permit program, as set forth in [40 CFR § 70.9(b)] (whether such costs are incurred by the permitting authority or other State or local agencies that do not issue permits directly, but that support permit issuance or administration).” At a minimum, any air program activity performed by an air agency under title V or part 70 must be included in program costs. Many of the activities required under title V or part 70 are described in Sections II.B through II.K of this guidance.

As described above, part 70 costs must include all “reasonable direct and indirect costs”²⁴ that are incurred by air agencies in the development, implementation, and enforcement of the part 70 program. “Direct costs” are expenses that can be directly attributed to part 70 program activities or services. “Direct costs” can generally be subdivided into two categories: “direct labor costs” and “other direct costs.” The term “direct labor costs” refers to salary and wages for direct work on part 70, including fringe benefits. The term “other direct costs” refers to other direct part 70 expenses, such as materials, equipment, professional services, official travel (e.g., transportation, food and lodging), public notices, public hearings, and contracted services. “Indirect costs” are costs for “general administration” or “overhead” that are not directly attributable to a part 70 program because they benefit multiple programs or cost objectives, but they are needed to operate a part 70 program. “Indirect costs” for a part 70 program are typically determined based on an indirect rate or a proportional share of the expenses of a larger organization. Examples of “indirect costs” include, but are not limited to, costs for utilities, rent, general administrative support, data processing charges, training and staff development, budget and accounting support, supplies and postage.

In addition, note that air agency accounting practices vary in how they nominally categorize costs as “direct costs,” “indirect costs,” or “other direct costs,” depending on the specific nature of the activity. An example would be training costs, which are typically treated as “indirect costs” but sometimes as “direct costs,” particularly where the training is about part 70 (e.g., for permit staff development). While accounting practices and terminology may vary among air agencies, the important principle to remember is that all reasonable direct and indirect costs of the program must be represented in the costs reported to the EPA, regardless of how the costs are categorized by the air agency.

Part 70 and the 1993 fee schedule guidance describe the part 70 activities of “reviewing and acting on any application for a part 70 permit”²⁵ and “implementing and enforcing the terms of any part 70

²³ See 40 CFR § 70.9(a).

²⁴ The phrases, “reasonable direct and indirect costs” and “reasonable (direct and indirect) costs” have the same meaning. The phrase “reasonable direct and indirect costs” was initially used by the EPA in the 1993 fee schedule guidance, page 1. The phrase “reasonable (direct and indirect) costs” is also found in CAA section 502(b)(3)(A), (C)(iii).

²⁵ The response to comments document for the part 70 final rule clarifies that the phrase “acting on permit applications” in section 503(c) of the Act means the act of issuing or denying a permit, not just beginning review of a permit application. See Technical Support Document for Title V Operating Permits Programs (May 1992) at page 4-4, EPA Docket No. EPA-HQ-OAR-2004-0288; Legacy Docket No. A-90-33.

permit,” and these activities must be included in part 70 costs.²⁶ The following paragraphs use these phrases to clarify the extent that certain activities performed by the air agency must be included in part 70 costs. The phrase “reviewing and acting on any application for a part 70 permit” refers to all activities related to processing the permit application and issuing (or denying) the final part 70 permit, while the phrase “implementing and enforcing the terms of any part 70 permit” refers to all activities necessary to administer and enforce final part 70 permits, prior to the filing of an administrative or judicial complaint or order.²⁷

Also, the following paragraphs clarify the extent to which fees must fund the costs of “permit programs under provisions of the Act other than title V” (hereafter referred to as “other permits”) (e.g., preconstruction review permits) and “activities which relate to provisions of the Act in addition to title V” (hereafter referred to as “other activities”) (e.g., a requirement for an air agency to develop a case-by-case emissions standard for an existing source).²⁸

Costs related to “other permits.”²⁹ The costs of “implementing and enforcing” the terms of a part 70 permit must be treated as a part 70 cost.³⁰ Thus, part 70 costs must include the cost of implementing and enforcing any term or condition of a non-part 70 permit required under the Act³¹ that is incorporated into a part 70 permit and meets the definition of “applicable requirement”³² in part 70. Similarly, the cost of implementing and enforcing any term or condition of a consent decree or order that originates in a non-part 70 permit that has been incorporated into a part 70 permit must be included as a part 70 cost.³³

The costs of implementing and enforcing “applicable requirements” from a non-part 70 permit that will go into a part 70 permit in the future may be counted as part 70 costs. However, once a source has

²⁶ The phrases “reviewing and acting on any application for a part 70 permit” and “implementing and enforcing the terms of any part 70 permit” are found at 40 CFR § 70.9(b)(1)(ii) and (iv). Similar phrases are found in the EPA’s 1993 fee schedule guidance at page 3 and the phrases in the guidance have the same meaning as the phrases in part 70. *See also*, CAA § 502(b)(3)(A).

²⁷ An EPA memo, *Matrix of Title V-Related and Air Grant-Eligible Activities*, OAQPS, U.S. EPA, September 23, 1993 (the “matrix guidance”), page 8, which clarifies that enforcement costs are counted for part 70 purposes prior to the filing of a complaint or order. *See* page 8.

²⁸ The phrases cited here were originally discussed on pages 2 and 3 of the cover memorandum for the 1993 fee schedule guidance.

²⁹ Note that the EPA’s 1993 fee schedule guidance contains the statement that “the costs of reviewing and acting on applications for permits required under Act provisions other than title V *need not* be recouped by title V fee.” This statement has been interpreted by some to mean that the costs of non-title V permits “are not needed” or “may *optionally*” be counted in title V costs.

³⁰ *See* 40 CFR § 70.9(b)(1)(iv).

³¹ Examples of non-part 70 permits required under the Act may include “minor new source review” (minor NSR) permits, “synthetic minor” permits, Prevention of Significant Deterioration (PSD) permits, and Nonattainment NSR permits authorized under title I of the Act.

³² “Applicable requirements” are the air quality requirements that must be included in part 70 permits. *See* the definition of “applicable requirement” in 40 CFR § 70.2, which includes “any terms and conditions of any preconstruction permits issued pursuant to any regulations [under title I],” and certain requirements under titles I, III, IV and VI of the Act.

³³ The EPA has previously explained that consent decrees and orders reflect the conclusion of a judicial or administrative process resulting from the enforcement of “applicable requirements,” and, because of this, all CAA-related requirements in such consent decrees and orders “are appropriately treated as ‘applicable requirements’ and must be included in title V permits. . . .” *See In the Matter of Citgo Refining and Chemicals Company, L.P.*, Order on Petition Number VI-2007-01, at 12 (May 28, 2009).

submitted a timely and complete part 70 application and paid part 70 fees, all costs of implementing and enforcing the non-part 70 permit must be counted as part 70 costs.³⁴

Also, any implementation and enforcement activities related to a requirement that is incorporated into a part 70 permit that is not “federally enforceable” and would not meet the definition of an “applicable requirement” (e.g., a “state-only” requirement) need not be treated as a part 70 cost.³⁵ The matrix guidance also clarifies that state-only requirements are air grant-eligible activities, rather than title V-eligible activities.

Costs of performing certain other activities related to applicable requirements. Certain activities required by the Act or its implementing regulations are not “applicable requirements” as defined in part 70 because they apply to the permitting authority rather than the source.³⁶ We refer to such activities as “other activities.” As such, questions often arise as to whether the costs of “other activities” are part 70 costs, costs of the underlying standard, or costs of the preconstruction review permitting process.

Examples of applicable requirements associated with “other activities” include, but are not limited to, the following:

- Emissions standards or other requirements for new sources under section 111(b) of the Act;
- Emissions standards or other requirements for existing sources under section 111(d) of the Act;
- Case-by-case maximum achievable control technology (MACT) standards that may be required under section 112 of the Act; and
- Activities required by a state, federal, or tribal implementation plan (SIP, FIP, or TIP), including section 110 of the Act.

The 1993 fee schedule guidance stated that the cost for performing “other activities” would be part 70 costs only to the extent the activities are “necessary for part 70 purposes.”³⁷ The 1993 fee schedule guidance has resulted in numerous questions over the years as to the scope of the term “part 70 purposes.” The EPA believes a clearer standard for determining when “other activities” must be included in part 70 costs would include an evaluation of: the extent to which the air agency is required to perform the “other activities” pursuant to part 70, title V, or the approved part 70 program; the extent to which the activity is performed to assure compliance with, or enforce, part 70 permit terms and conditions; or the extent to which a non-part 70 rule (e.g., a section 111 or 112 standard) requires the air agency to perform the activity in the part 70 permitting context. If an “other activity” does not meet any

³⁴ See EPA memo, *Additional Guidance on Funding Support for State and Local Programs*, Mary D. Nichols, Assistant Administrator for Air and Radiation, U.S. EPA, to Regional Administrators, Regions I–X, August 28, 1994.

³⁵ See 40 CFR § 70.6(b)(2).

³⁶ Although the “other activities” may originate within a federal standard or requirement that we generally refer to as an “applicable requirement” and the activities may result in an “applicable requirement,” the activities themselves do not meet the definition of “applicable requirement” within 40 CFR § 70.2.

³⁷ See page 2 of the introductory memorandum for the 1993 fee schedule guidance.

of these criteria (e.g., a non-part 70 rule requires an activity in a non-part 70 context), it should not be included in part 70 costs.

Nonetheless, if any activity is an “applicable requirement” for a source, the applicable requirement must be included in a part 70 permit and the costs to the air agency of including it in the permit (and implementing and enforcing) must be treated as part 70 costs.³⁸

For example, the cost of *incorporating* a standard (e.g., a section 111(b) standard) into a part 70 permit—where the task is merely one of copying the requirements from the regulation unchanged into a permit—would be a part 70 cost. However, the cost of *developing* a source-specific emission limitation outside the permit processing context (e.g., a standard pursuant to section 111(d) emission guidelines) would be a section 111 cost (although the cost of subsequently incorporating that standard into the part 70 permit would be a part 70 cost).

The costs of “other activities” related to implementation plans, including section 110 or 111 of the Act, should not be counted for part 70 purposes if the activities are required as part of the preconstruction review process or directly relate to implementation plan development, as required by title I of the Act.³⁹ On the other hand, part 70 costs can include ambient monitoring or emission inventories necessary to implement the part 70 program (e.g., development and quality assurance of emissions inventory for potential part 70 sources for the purpose of determining applicability).⁴⁰ If an air agency is unsure where to draw the line on including such activities in part 70 costs, they should contact the EPA for assistance.

General standard for EPA review of part 70 costs for a particular air agency. In general, the EPA expects that part 70 permit fees will fund the activities listed in this guidance. However, in evaluating a part 70 program, the EPA will consider the particular design and attributes of that program. Because the nature of permitting-related activities can vary across air agencies, the EPA evaluates each program individually. The activities listed in this guidance may not represent the full range of activities to be covered by permit fees.⁴¹ Additionally, some air agencies may have further program needs based on the particularities of their own air quality issues and program structure.

Sections II.B through II.K of this guidance provide further information on specific permitting activities and the extent to which the costs of such activities must be treated as part 70 costs.

B. The Costs of Part 70 Program Administration

All part 70 program administration costs must be treated as part 70 costs.⁴² Examples of program administration costs include:

³⁸ See § 70.9(b)(1)(ii), (4).

³⁹ Implementation plan development is mandated under title I of the Act and costs typically include such activities as maintaining state-wide emissions inventories and performing ambient monitoring and emissions modeling of air pollutants for which national ambient air quality standards have been set.

⁴⁰ See the matrix guidance at page 1.

⁴¹ The fee demonstration guidance cites various factors that may affect the types of activities included in a permit program and influence costs. See fee demonstration guidance at 4-5.

⁴² This section includes many activities that would be categorized as part 70 costs under 40 CFR §§ 70.9(b)(1)(i)-(iii) that are not covered elsewhere in subsequent sections of this guidance and are necessary to conduct a part 70 program.

- Program infrastructure costs (e.g., development of part 70 regulations, implementation guidance, policies, procedures, and forms);
- Program integration costs (adapting to changes in related programs, such as NSR, section 112 programs, and other programs);
- Data system implementation costs (including data systems for submitting permitting information to the EPA, for permit program administration, implementation and tracking and to provide public access to permits or permit information);
- Costs to operate local or Regional offices for part 70, the costs of interfacing with other state, local, or tribal offices (e.g., briefing legislative or executive staff on program issues and responding to internal audits);
- Costs related to interfacing with the EPA (e.g., related to program oversight, including program evaluations, responding to public petitions, revising implementation agreements between the air agency and the EPA); and
- Activities similar to those above.

In addition, there are other program implementation costs, such as the costs of making determinations of which sources are subject to part 70 permitting requirements that must be treated as part 70 costs.⁴³

Examples of such activities include:

- Maintaining an inventory of part 70 sources (e.g., for enforcement of the requirement for sources to obtain a permit or for part 70 fee purposes);
- Costs of determining if an individual source is a major source (for applicability purposes);
- Costs of determining if a source qualifies for coverage under a general permit (if the air agency chooses to issue them); and
- Costs of determining if a non-major source is required to obtain a part 70 permit and costs of implementing any insignificant activity and emission level exemptions under part 70.

C. The Costs of Part 70 Program Revisions

All costs of revising an approved part 70 program must be treated as part 70 costs, including the costs of developing new program elements to respond to changes in requirements, whether the revisions are the air agency's own initiative or required by the EPA.⁴⁴ Examples of program revision costs include:

- Costs of revising the program elements that are changing (e.g., program legal authority, implementing regulations, data systems, and other program elements);

⁴³ Many of these activities may also be described as related to reviewing and acting on applications for part 70 permits, as provided in 40 CFR § 70.9(b)(1)(ii).

⁴⁴ See 40 CFR § 70.4(i).

- Costs of documenting the changes; and
- Costs associated with obtaining the needed approvals, including for submitting program revisions to the EPA and any necessary follow-up work related to obtaining approval.

D. The Costs of Reviewing Applications and Acting on Part 70 Permits

All costs of reviewing an application for a part 70 permit, developing applicable requirements as part of the process of a permit, and ultimately acting upon the application must be treated as part 70 costs.⁴⁵ These costs must include the costs of the application completeness determination, the technical review of the application (including the review of any supplemental monitoring that may be needed, review of any compliance plans, compliance schedules, and review of initial compliance certifications included in the application), drafting permit terms and conditions to reflect the applicable requirements that apply to the source, determining if any permit shields apply, public participation, the EPA and affected air agency review, and issuing the permit. The cost of these activities must be included for initial permit processing, permit renewal, permit reopening, and permit modification.

The costs of developing part 70 permit terms and conditions. All costs associated with the development of permit terms and conditions to reflect the “applicable requirements,” including the costs of incorporating such terms in part 70 permits, must be treated as part 70 costs. The applicable requirements include the emissions limitations and standards and other requirements as provided for in the definition of applicable requirements in 40 CFR § 70.2. Such costs may include the costs to determine the provisions of the applicable requirements that specifically apply to the source, to develop operational flexibility provisions, netting/trading conditions, and appropriate compliance conditions (e.g., inspection and entry, monitoring and reporting). Appropriate compliance provisions may include periodic monitoring and testing under 40 CFR § 70.6(a)(3)(i)(B) and monitoring sufficient to assure compliance under 40 CFR § 70.6(c)(1).

Part 70 also requires certain regulatory provisions to be included in permits, such as citation to the origin and authority of each permit term, a statement of permit duration, requirements related to fee payment, certain part 70 compliance and reporting requirements, a permit shield (if provided by the air agency), and similar terms. The costs of developing such terms must be covered by permit fees.⁴⁶

The costs of developing “state-only” permit terms need not be treated as part 70 costs. Air agencies should screen or separate “state-only” requirements from federally-enforceable requirements and—while the act of separating part 70 terms from state-only terms should be treated as part 70 costs—the costs of developing state-only permit terms, putting them in the part 70 permit, and implementing and enforcing them as they appear in the part 70 permit need not be treated as part 70 costs for fee purposes.⁴⁷

⁴⁵ See CAA section 502(b)(3)(A)(i); 40 CFR § 70.9(b)(1)(ii).

⁴⁶ See 40 CFR § 70.6.

⁴⁷ See the matrix guidance, which notes that state-only requirements in part 70 permits are air-grant-eligible activities, rather than title V-eligible activities.

The costs of public participation and review (by the EPA and the affected air agency).⁴⁸ All costs of notices (or transmitting information) to the public, affected air agencies and the EPA for part 70 permit issuance, renewal, significant modifications and (if required by state or local law) for minor modifications (including staff time and publication costs) must be treated as part 70 costs.⁴⁸

Any costs associated with hearings for part 70 permit issuance, renewal, significant modifications, and for minor modifications (if required by state or local law), including preparation, administration, response, and documentation, must be treated as part 70 costs.

All costs for the air agency to develop and provide a response to public comments received during the public comment period must be treated as part 70 costs.

Any costs associated with transmitting necessary documentation to the EPA for review and response to an EPA objection must be treated as part 70 costs.⁴⁹ Also, the costs associated with an air agency's response to an EPA order granting objection to a part 70 permit and/or the costs of defending challenges to part 70 permit terms in state court must be treated as part 70 costs.

E. The Costs of Implementation and Enforcement of Part 70 Permits

With some exceptions related to court costs and enforcement actions, the costs of implementing and enforcing the terms of any part 70 permit must be treated as part 70 program costs.⁵⁰ Implementation and enforcement of permit terms and conditions related to part 70 includes requirements for compliance plans, schedules of compliance, monitoring reports, deviation reports, and annual certifications.

The costs of any follow-up activities when compliance/enforcement issues are encountered should be treated as part 70 costs. Part 70 costs include such activities as conducting site visits, stack tests, inspections, audits, and requests for information either before or after a violation is identified (e.g., requests similar to the EPA's CAA section 114 letters).

Part 70 costs should include the costs for any notices, findings, and letters of violation, and the development of cases and referrals up until the filing of the complaint or order. Excluded from permit costs are enforcement costs incurred after the filing of an administrative or judicial complaint.⁵¹

Part 70 costs must also include the costs of implementing and enforcing any restrictions on potential to emit (PTE) that are included in a part 70 permit, whether they originate in the part 70 permit or were transferred from a non-part 70 permit, such as a minor NSR permit for a "synthetic minor source."

⁴⁸ See 40 CFR § 70.7(h) concerning public participation and 40 CFR § 70.8 concerning the EPA and affected air agency review.

⁴⁹ See 40 CFR § 70.8(a).

⁵⁰ See 40 CFR §§ 70.4(b), 70.6, 70.9(b)(1)(iv), and 70.11.

⁵¹ See the matrix guidance at page 8.

F. The Costs of Implementing and Enforcing the Requirements of Non-Title V Permits Required Under the Act

Part 70 fees must cover the costs of implementing and enforcing the terms and conditions of “other permits” (non-part 70 permits) required under the Act, such as preconstruction review permits under title I, that have been incorporated in part 70 permits as “applicable requirements.”⁵²

Also, the costs of implementing and enforcing the terms and conditions of consent decrees and orders that originate in a non-part 70 permit that are incorporated into a part 70 permit must be treated as part 70 costs. *See* Section II.A of this guidance.

The costs of implementing and enforcing applicable requirements for “prospective part 70 sources” need not be treated as part 70 costs until such time as the source submits a timely and complete permit application and pays fees. In addition, the costs of implementing and enforcing “state-only” requirements need not be treated as part 70 costs.

G. The Costs of Performing Certain “Other Activities” Related to Applicable Requirements

Certain activities are required by the Act but are not “applicable requirements” because they apply to the permitting authority, rather than the source; such activities are referred to as “other activities.”⁵³ Examples of applicable requirements that contain these activities include, but are not limited to, standards for existing sources under section 111(d) of the Act; case-by-case MACT under sections 112 of the Act; and certain activities required by a SIP, FIP, or TIP, including section 110 of the Act. The costs of other activities must be treated as part 70 costs, if the air agency is required to perform the activities by part 70, title V, or the air agency’s approved part 70 program; if a non-part 70 rule requires them to be performed in the part 70 permitting context; or if the activities are needed to assure compliance with, or to enforce, the terms and conditions of a part 70 permit. The costs of other activities should not be treated as part 70 costs, if they do not meet any of these criteria (e.g., a non-part 70 rule requires an activity that occurs in a non-part 70 context). *See* Section II.A of this guidance.

H. The Costs of Revising, Reopening, and Renewing Part 70 Permits

All costs associated with processing permit revisions, including for administrative amendments, minor modifications (fast-track and group processing), and significant modifications, must be treated as part 70 costs.⁵⁴ The part 70 costs must include all the costs of reviewing and acting on the application, as well as implementing and enforcing the revised permit terms.⁵⁵ The costs of implementing any “operational flexibility provisions”⁵⁶ approved into a program to streamline permit revision procedures must be treated as permit program costs (this may also generally be considered to be one of the costs of implementing a permit).

⁵² Required to be treated as part 70 costs in certain cases by 40 CFR § 70.9(b)(1)(iv).

⁵³ Required to be treated as part 70 costs in certain cases by 40 CFR §§ 70.9(b)(1)(ii) and (iv).

⁵⁴ Required to be treated as part 70 costs under 40 CFR § 70.9(b)(1)(ii). Also *see* 40 CFR § 70.7 for more on permit issuance, renewal, reopening and revision procedures.

⁵⁵ 40 CFR §§ 70.9(b)(1)(ii) and (iv).

⁵⁶ Section 502(b)(10) of the Act requires the operating permit regulations to include provisions to allow changes within a permitted facility without requiring a permit revision under certain circumstances. The EPA refers to these provisions as “operational flexibility provisions.” *See* 40 CFR § 70.4(b)(12).

The cost for the air agency to reopen a part 70 permit for cause must be treated as part 70 costs. The proceedings to reopen a permit shall follow the same procedures that apply to initial permit issuance, and include a requirement for the air agency to provide a notice to the source of the agency's intent to reopen the permit.

When the EPA reopens a part 70 permit for cause, the air agency's costs for the proposed determination of termination, modification, or revocation and reissuance, and the costs to resolve the objection in accordance with the EPA's objection, must be treated as part 70 costs.

The cost of renewing permits every 5 years, which involves the same procedural requirements, including public participation, and the EPA and affected air agency review, must be treated as part 70 costs,⁵⁷ just as for initial permit issuance.

I. The Costs of General and Model Permits

All costs for development and implementation of general and model permits under part 70 must be included in part 70 program costs, including the costs of drafting permits, public participation, the EPA review and any affected air agency's review, permit issuance, publication, assessing applications for coverage under the general permit, and other related costs.⁵⁸ Note that the issuance of general and model permits is an option for air agencies, but if such permits are issued by an air agency under part 70, the costs must be included in part 70 costs.

J. The Costs of the Portion of the Small Business Assistance Program (SBAP) Attributable to Part 70 Sources

The SBAP under title V is authorized to provide counseling to help small business stationary sources to determine and meet their obligations under the Act.⁵⁹ The SBAP is authorized to provide assistance to small business stationary sources, as defined by CAA§ 507(c)(1), under the preconstruction and operating permit programs; however, air agencies need only to include costs related to assistance with part 70 in part 70 costs.⁶⁰ See 40 CFR § 70.9(b)(1)(viii). Allowable costs for part 70 include the costs to establish a small business ombudsman program to provide information on the applicability of part 70 to sources, available assistance for part 70 sources, the rights and obligations of part 70 sources, and options for sources subject to part 70. Allowable costs also include the costs associated with part 70 applicability determinations.

⁵⁷ 40 CFR § 70.9(b)(1)(ii).

⁵⁸ Required to be included in part 70 costs by 40 CFR §§ 70.9(b)(1)(ii) and (iv). Also see 40 CFR § 70.6(d) for more on the administration of general permits.

⁵⁹ For examples of the types of activities of a SBAP that could be attributable to part 70 sources and funded by part 70 fees, see *Transition to Funding Portions of State and Local Air Programs with Permit Fees Rather than Federal Grants*, Mary D. Nichols, Assistant Administrator for Air and Radiation, U.S. EPA, to Regional Administrators, Regions I – X, July 21, 1994 ("transition guidance"); Letter from Conrad Simon, Director, Air & Waste Management Division, EPA Region II to Mr. Billy J. Sexton, Director, Jefferson County Department of Planning and Environmental Management, Air Pollution Control District, Louisville, Kentucky, January 23, 1996 ("Sexton memo").

⁶⁰ Note that the preconstruction review permitting costs of assisting non-part 70 sources should generally not be included as part 70 costs, except for costs related to implementation and enforcement of permit terms from a preconstruction review permit that have been included in a part 70 permit.

Part 70 costs for SBAP must include the costs for outreach/publications on the requirements of part 70 and/or the applicable requirements included in part 70 permits, the costs of assisting part 70 sources through a clearinghouse on compliance methods and technologies, including pollution prevention approaches, and the costs to assist sources with part 70 permitting, which may include the portion of costs for a small business compliance advisory panel that are related to part 70.

K. The Costs of Permit Fee Program Administration

All costs associated with the administration of an air agency's part 70 fee program must be included in part 70 costs, including the costs for revising fee schedules (as needed to cover all required costs), periodic updates, detailed accounting (if needed), determining the presumptive minimum for the air agency, participating in EPA evaluations of fee programs or similar EPA oversight activities, assisting sources with fee issues, auditing fee payment by sources, assessing penalties for fee payment errors, responding to internal audits and inquiries, and similar activities.⁶¹

III. Flexibility in Fee Schedule Design

An air agency may design its fee schedule to collect fees from sources using various methods, provided the fee structure raises sufficient revenue to cover all required program costs.⁶² Thus, air agencies may charge: emissions-based fees based on actual emissions or allowable emissions; fixed fees for certain permit processes (different fees for initial permit review, renewals, or for various types of permit revisions); different fee rates (e.g., dollars per ton of emissions) for certain air pollutants; fees reflecting the actual costs of services for sources (such as charging for time and materials for a review); or other types of fees, including any combination of such fees. Finally, air agencies may charge annual fees or fees covering some other period of time.

This flexibility for fee schedule design is available without regard to whether the air agency has set its fees to collect above or below the presumptive minimum. Many air agencies have designed their fee schedules to collect fees using an emissions-based approach that mirrors the approach of part 70 for determining the presumptive minimum program cost for an air agency.⁶³ However, air agencies are not required to charge fees to sources in that manner, and it is possible that such an approach may not necessarily result in fees that would be sufficient to cover all part 70 program costs.

⁶¹ See 40 CFR § 70.9(b)(1)(ii); *Overview of Clean Air Title V Financial Management and Reporting – A Handbook for Financial Managers*, Environment Finance Center, University of Maryland, Maryland Sea Grant College, University of Maryland. Supported by a grant from the U.S. EPA, January 1997 ("Financial Manager's Handbook") (providing an overview of air agency application of general government accounting, budgeting, and financial reporting concepts to the part 70 program).

⁶² See 40 CFR § 70.9(b)(3).

⁶³ See 40 CFR § 70.9(b)(2)(i).

IV. The EPA Review of Existing Air Agency Fee Programs

The initial program submittals involved review of data on expected fee revenue, program costs and accounting practices that were prospective in nature, since little or no data would have been available on actual fees or costs at that time.

At this point, the EPA review of air agency fee programs generally focuses on a review of actual data on fee revenue, program costs, and review of existing accounting practices. The EPA oversight of existing fee programs will also likely be conducted as part of a program evaluation, a separate fee evaluation, or through submittal of any periodic updates or detailed accountings related to fee demonstration requirements. The EPA has issued a separate memorandum and guidance on part 70 program and fee evaluations concurrently with this updated fee schedule guidance.⁶⁴

Fee evaluations for existing part 70 programs will generally focus on certain key requirements of the Act and part 70 for fees discussed in Section I, *General Principles for Review of Title V Fee Schedules*, of this guidance. Such reviews may cover certain aspects of air agency accounting practices and procedures related to fees, particularly fee assessment procedures, tracking of fee collection and revenue uses (including transfers in and out of part 70 program accounts), whether all part 70 costs are included in the air agency's accounting of costs, and potentially other accounting aspects.

A fee evaluation may include a review of an air agency's fee program status with respect to the presumptive minimum defined in 40 CFR § 70.9(b)(2). This may be important in cases where a part 70 program was initially approved to charge above the presumptive minimum, in order to determine if the air agency is now charging less than the presumptive minimum. This is relevant because 40 CFR § 70.9(b)(5)(i) requires an air agency to submit a detailed accounting to show that its fees would be adequate to cover the program costs if the air agency charges less than the presumptive minimum. This requirement is ongoing (not restricted to program submittals).

In addition, the EPA revised the part 70 requirements related to calculating the presumptive minimum to add a "GHG cost adjustment" in an October 23, 2015, final rule.⁶⁵ Although the EPA has announced a review of this final rule (82 FR 16330, April 4, 2017), the EPA has not proposed any specific changes to the "GHG cost adjustment." Because air agencies are required to collect sufficient fees to cover the costs of implementing their operating permit programs, they may still use the "GHG cost adjustment" (as applicable) in calculating the fees owed to reflect the associated administrative burden of considering GHGs in the permitting process. The "GHG cost adjustment" is designed to cover the overall added administrative burden of adding GHGs to the permitting program in a general sense.

⁶⁴ *Program and Fee Evaluation Strategy and Guidance for Part 70*, Peter Tsigotis, Director, Office of Air Quality Planning and Standards (OAQPS), U.S. EPA, to Regional Air Division Directors, Regions 1 – 10, March 27, 2018.

⁶⁵ The "GHG cost adjustment" was promulgated as part of an October 23, 2015, final rule titled, *Standards of Performance for Greenhouse Gas Emissions from New, Modified and Reconstructed Stationary Sources: Electric Utility Generating Units*, 80 FR 64510. Specifically, see Section XII.E. "Implications for Title V Fee Requirements for GHGs" at page 64633. See also 40 CFR §§ 70.9(b)(2)(v) and (d)(3)(viii).

“Presumptive Minimum” Calculation

1. **Calculate the “Cost of Emissions.”** The calculation is based on multiplying the actual emissions of “fee pollutants”⁶⁶ (tons) from the air agency’s part 70 sources for a preceding 12-month period by the “presumptive minimum fee rate”⁶⁷ (\$/ton) that is in effect at the time the calculation is performed.

Air agencies may exclude the following types of fee pollutants from the calculation:

- Actual emissions of each regulated fee pollutant in excess of 4,000 tons per year on source-by-source basis.⁶⁸
 - Actual emissions of any regulated fee pollutant emitted by a part 70 source that was already included in the presumptive minimum fee calculation (i.e., double-counting of the same pollutant is not required).⁶⁹
 - Insignificant quantities of actual emissions not required in a permit application pursuant to 40 CFR § 70.5(c).⁷⁰
2. **Calculate the “GHG Cost Adjustment” (as applicable)**⁷¹ The “GHG cost adjustment” is the cost for the air agency to conduct certain application reviews (activities) to determine if GHGs have been properly addressed for an annual period. The adjustment is calculated by multiplying the total hours to conduct the activities (burden hours) by the average cost of staff time (\$/hour) to conduct the activities.

To calculate the total hours for the air agency to conduct the activities, multiply the number of activities performed in each category listed in the following table by the corresponding “burden hours per activity factor,” and sum the results.⁷²

Table 1. GHG reviews counted for GHG cost adjustment purposes

Activity	Burden Hours per Activity Factor
GHG completeness determination (for initial permit or updated application)	43
GHG evaluation for a permit modification or related permit action	7
GHG evaluation at permit renewal	10

⁶⁶ The term “fee pollutants” used here is shorthand for “regulated pollutants (for presumptive fee calculation),” as defined in 40 CFR § 70.2.

⁶⁷ The “presumptive minimum fee rate” is calculated by the EPA in September of each year and is effective from September 1 to August 31 of the following year. The fee rate is adjusted annually for changes in the Consumer Price Index (CPI) and is published on the following Internet site: <https://www.epa.gov/title-v-operating-permits/permit-fees>.

⁶⁸ See 40 CFR § 70.9(b)(2)(ii)(B).

⁶⁹ See 40 CFR § 70.9(b)(2)(ii)(C). For example, a source may emit an air pollutant that is defined as both a hazardous air pollutant and a pollutant for which a national ambient air quality standard has been established, e.g., a volatile organic compound. The actual emissions of such a pollutant is not required to be counted twice for fee purposes.

⁷⁰ See 40 CFR § 70.9(b)(2)(ii)(D).

⁷¹ See 40 CFR §§ 70.9(b)(2)(i) and (v).

⁷² The table shown here is found at 40 CFR § 70.9(b)(2)(v).

To determine the GHG cost adjustment(\$), the total hours to conduct the reviews (calculated above) is multiplied by the average cost of staff time (\$/hour). The average cost of staff time must include wages, employee benefits, and overhead and will be unique to the air agency. The average cost may be known for the air program or may be available from the air agency budget office or accounting staff.

3. **Calculate the Total Presumptive Minimum.** The total presumptive minimum(\$) for the annual period is determined by adding the “cost of emissions” (determined in Step 1) and the “GHG cost adjustment,” as applicable (determined in Step 2).

See Attachment B, *Example Presumptive Minimum Calculation*, for an example calculation for a hypothetical air agency that incorporates the “GHG cost adjustment.”

V. Future Adjustments to Fee Schedules

Air agencies must collect part 70 fees that are sufficient to cover the part 70 permit program costs.⁷³ Accordingly, air agencies may need to revise fee schedules periodically to remain in compliance with the requirement that permit fees cover all part 70 permit program costs. Changes in costs over time may be due to many factors, including but not limited to: changes in the number of sources required to obtain part 70 permits; changes in the types of permitting actions being performed; promulgation of new emission standards; and minor source permitting requirements for CAA sections 111, 112, or 129 standards. Air agencies should keep the EPA Regions apprised of any changes to fee schedules over time. The EPA will assess the proposed revision and determine whether it must be processed by the EPA as a substantial or non-substantial revision. As part of this process, the EPA may request additional information, as appropriate.

⁷³ 40 CFR § 70.9(a).

ATTACHMENT A

List of Guidance Relevant to Part 70 Fee Requirements

EPA Guidance on Part 70 Requirements:

- January 1992 – *Guidelines for Implementation of Section 507 of the Clean Air Act Amendments—Final Guidelines*, Office of Air Quality Planning and Standards (OAQPS), U.S. EPA. See pages 5 and 11-12 concerning fee flexibility for small business stationary sources:
<http://www.epa.gov/sites/production/files/2015-08/documents/smbus.pdf>.
- July 7, 1993 – *Questions and Answers on the Requirements of Operating Permits Program Regulations*, U.S. EPA. See Section 9: http://www.epa.gov/sites/production/files/2015-08/documents/bbrd_qal.pdf.
- August 4, 1993 – *Reissuance of Guidance on Agency Review of State Fee Schedules for Operating Permits Programs under Title V*, John S. Seitz, Director, OAQPS, U.S. EPA, to Air Division Directors, Regions I-X (“1993 fee schedule guidance”). Note that there was an earlier document on this subject that was superseded by this document:
<http://www3.epa.gov/ttn/naaqs/aqmguide/collection/t5/fees.pdf>.
- August 9, 1993 – *Acid Rain Title V Guidance on Fees and Incorporation by Reference*, Brian J. McLean, Director, Acid Rain Division, U.S. EPA, to Air, Pesticides, and Toxics Division Directors, Regions I, IV, and VI, Air and Waste Management Division Director, Region II, Air and Toxics Division Directors, Regions III, VII, VIII, IX and X and Air and Radiation Division Director, Region V: <http://www.epa.gov/sites/production/files/2015-08/documents/combo809.pdf>.
- September 23, 1993 – *Matrix of Title V-Related and Air Grant Eligible Activities*, OAQPS, U.S. EPA (“matrix guidance”). The matrix notes that it is to be “read and used in concert with the August 4, 1993, fee [schedule] guidance”: <http://www.epa.gov/sites/production/files/2015-08/documents/matrix.pdf>.
- October 22, 1993 – *Use of Clean Air Act Title V Permit Fees as Match for Section 105 Grants*, Gerald M. Yamada, Acting General Counsel, U.S. EPA, to Michael H. Shapiro, Acting Administrator, Office of Air and Radiation, U.S. EPA:
<https://www.epa.gov/sites/production/files/2015-08/documents/usefees.pdf>.
- November 01, 1993 – *Title V Fee Demonstration and Additional Fee Demonstration Guidance*. John S. Seitz, Director, OAQPS, U.S. EPA, to Director, Air, Pesticides and Toxics Management Division, Regions I and IV, Director, Air and Waste Management Division, Region II, Director, Air, Radiation and Toxics Division, Region III, Director, Air and Radiation Division, Region V, Director, Air, Pesticides and Toxics Division, Region VI and Director, Air and Toxics Division, Regions VII, VIII, IX and X, U.S. EPA (“fee demonstration guidance”):
<http://www3.epa.gov/ttn/naaqs/aqmguide/collection/t5/feedemon.pdf>.

- July 21, 1994 – *Transition to Funding Portions of State and Local Air Programs with Permit Fees Rather than Federal Grants*, Mary D. Nichols, Assistant Administrator for Air and Radiation, U.S. EPA, to Regional Administrators, Regions I – X (“transition guidance”): <http://www.epa.gov/sites/production/files/2015-08/documents/grantmem.pdf>.
- August 28, 1994 – *Additional Guidance on Funding Support for State and Local Programs*, Mary D. Nichols, Assistant Administrator for Air and Radiation, U.S. EPA, to Regional Administrators, Regions I – X (“additional guidance memo”): <http://www.epa.gov/sites/production/files/2015-08/documents/guidline.pdf>.
- January 25, 1995 – *Options for Limiting the Potential to Emit (PTE) of a Stationary Source Under Section 112 and Title V of the Clean Air Act (Act)*, John S. Seitz, Director for Office of Air Quality Planning and Standards, U.S. EPA, to Regional Directors, Regions I – X: <https://www.epa.gov/sites/production/files/documents/limit-pte-rpt.pdf>.
- January 23, 1996 – Letter from Conrad Simon, Director, Air & Waste Management Division, EPA Region II to Mr. Billy J. Sexton, Director, Jefferson County Department of Planning and Environmental Management, Air Pollution Control District, Louisville, Kentucky (“Sexton memo”): https://www.epa.gov/sites/production/files/2016-04/documents/sexton_1996.pdf.
- January 1997 – *Overview of Clean Air Title V Financial Management and Reporting – A Handbook for Financial Managers*, Environment Finance Center, University of Maryland, Maryland Sea Grant College, University of Maryland. Supported by a grant from the U.S. EPA (“financial manager’s handbook”): <http://www.epa.gov/sites/production/files/2015-08/documents/t5finance.pdf>.
- October 23, 2015 – *Standards of Performance for Greenhouse Gas Emissions from New, Modified and Reconstructed Stationary Sources: Electric Utility Generating Units: Final Rule* (80 FR 645110). See Section XII.E, “Implications for Title V Fee Requirements for GHGs” at page 64633: <http://www.gpo.gov/fdsys/pkg/FR-2015-10-23/pdf/2015-22837.pdf>.

Guidance on Governmental Accounting Standards Relevant to Part 70:

- Handbook of Federal Accounting Standards and Other Pronouncements, as Amended, as of June 30, 2015, Federal Accounting Standards Advisory Board (FASAB). http://www.fasab.gov/pdf/files/2015_fasab_handbook.pdf.
- Statement of Federal Financial Accounting Standards 4: *Managerial Cost Accounting Standards and Concepts*, page 396 of the FASB Handbook (“SFFAS No. 4”).
- Statement of Federal Financial Accounting Standards 7: *Accounting for Revenue and Other Financial Sources and Concepts for Reconciling Budgetary and Financial Accounting*, page 592 of the FASAB Handbook (“SFFAS No. 7”).

Statements of the Governmental Accounting Standards Board (GASB):

- Statement No. 33, *Accounting and Financial Reporting for Nonexchange Transactions* (December 1998) (“GASB Statement No. 33”): http://www.gasb.org/jsp/GASB/Document_C/GASBDocumentPage?cid=1176160029148&acceptedDisclaimer=true.

- Statement No. 34, *Basic Financial Statements – and Management’s Discussion and Analysis – for State and Local Governments* (June 1999) (“GASB Statement No. 34”):
http://www.gasb.org/jsp/GASB/Document_C/GASBDocumentPage?cid=1176160029121&acceptedDisclaimer=true.

ATTACHMENT B

Example Presumptive Minimum Calculation

This attachment provides an example calculation of the “presumptive minimum” under 40 CFR part 70 for a hypothetical air agency (“Air Agency X”).¹

Background:

- The “presumptive minimum” is an amount of fee revenue for an air agency that is presumed to be adequate to cover part 70 costs.²
 - If an air agency’s fee schedule would result in fees that would be less than the presumptive minimum, there is no presumption that its fees would be adequate to cover part 70 costs and the air agency is required to submit a “detailed accounting” to show that its fees would be sufficient to cover its part 70 costs.³
 - If an air agency’s fee schedule would result in fees that would be at least equal to the presumptive minimum, there is a presumption that its fees would be adequate to cover costs and a “detailed accounting” is not required. However, a “detailed accounting” is required whenever the EPA determines, based on comments rebutting the presumption of fee adequacy or on the EPA’s own initiative, that there are serious questions regarding whether its fees are sufficient to cover part 70 costs.⁴
- In addition, independent of the air agency’s status with respect to the presumptive minimum, a “detailed accounting” is required whenever the EPA determines on its own initiative that there are serious questions regarding whether an air agency’s fee schedule is sufficient to cover its part 70 costs. This is required because part 70 requires an air agency’s fee revenue to be sufficient to cover part 70 permit program costs.⁵
- The quantity of air pollutants and the “GHG cost adjustment” are unique to each air agency and vary from year-to-year. As a result, the presumptive minimum calculated for an air agency is also unique to that particular agency on a year-to-year basis.
- No source should use the presumptive minimum calculation described in this attachment to calculate its part 70 fees.⁶ Sources should instead contact their air agency for more information on how to calculate fees for a source.

¹ The example calculation follows the requirements of 40 CFR § 70.9(b)(2)(i)-(v).

² See 40 CFR § 70.9(b)(2)(i).

³ See 40 CFR § 70.9(b)(5) (concerning the “detailed accounting” requirement).

⁴ See 40 CFR § 70.9(b)(5)(ii).

⁵ See 40 CFR §§ 70.9(a) and (b)(1).

⁶ See 40 CFR § 70.9(b)(3) (providing air agencies with flexibility on how they charge fees to individual sources).

- An air agency may calculate the presumptive minimum in several circumstances:
 - As part of a fee demonstration submitted to the EPA when an air agency sets its fee schedule to collect at or above the presumptive minimum.
 - As part of a fee evaluation to determine if an air agency with a fee schedule originally approved to be at or above the presumptive minimum now results in fees that are below the current presumptive minimum. When this occurs, the air agency is required to submit a “detailed accounting” to show that its fee schedule will be sufficient to cover all required program costs. Such a change in the presumptive minimum for an air agency may occur for many reasons over time.⁷
 - To update the presumptive minimum amount for the air agency to account for changes that have occurred since the calculation was last performed. A common reason for an air agency to do this is to recalculate the amount to add the GHG cost adjustment.⁸

The presumptive minimum calculation is generally composed of three steps:

1. *Calculation of the “cost of emissions.”* The “cost of emissions” is proportional to the emissions of certain air pollutants of part 70 sources.
2. *Calculation of the “GHG cost adjustment” (as applicable).* The “GHG cost adjustment,” promulgated in October 23, 2015, is intended to recover the costs of incorporating GHGs into the permitting program.
3. *Sum the values calculated in Steps 1 and 2.*

⁷ It has been almost two decades since most part 70 programs were approved. Changes may have occurred since then that would affect the presumptive minimum calculation for an air agency. For example, changes in the emissions inventory for part 70 sources or changes to air agency fee schedules. The part 70 rules were also revised in 2015 to add a “GHG cost adjustment” to the calculation of the presumptive minimum fee.

⁸ See 80 FR 64633 (October 23, 2015); 40 CFR § 70.9(b)(2)(v).

Example Scenario and Calculation:

Air Agency X performs its presumptive minimum calculation in November of 2016 using data for Fiscal Year 2016 (FY16 or October 1, 2015, through September 30, 2016).

Step 1 – Calculate the Cost of Emissions:

The “cost of emissions” is determined by multiplying the air agency’s inventory of actual emissions of certain pollutants from part 70 sources (“fee pollutants”) by an annual fee rate determined by the EPA.

A. Determine the Actual Emissions of “Fee Pollutants” for a 12-month Period Prior to the Calculation.

Note that the term “fee pollutants” used here is shorthand for “regulated pollutants (for presumptive fee calculation),” a defined term in part 70,⁹ which includes air pollutants for which a national ambient air quality standard has been set, hazardous air pollutants, and air pollutants subject to a standard under section 111 of the Act, excluding carbon monoxide, greenhouse gases, and certain other pollutants.¹⁰ Note that any preceding 12-month period may be used, for example, a calendar year, a fiscal year, or any other period that is representative of normal source operation and consistent with the fee schedule used by the air agency.

For example, a review of Air Agency X’s emissions inventory records for part 70 sources for the 12-month period (FY16) indicates that the actual emissions of “fee pollutants” were 15,700 tons.

Total “Fee Pollutants”^t = 15,700 tons for FY16

B. Determine the Presumptive Minimum Fee Rate (\$/ton) Effective at the Time the Calculation is Performed.

The presumptive minimum fee rate is updated by the EPA annually and is effective from September 1 until August 31 of the following year. Historical and current fee rates are available online: <https://www.epa.gov/title-v-operating-permits/permit-fees>. The fee rate used in the calculation is the one that is effective on the date the calculation is performed, rather than the fee rate in effect for the annual period of the emissions data.

For example, Air Agency X calculates its “presumptive minimum” for FY16 in November 2016. The air agency first refers to the EPA website (listed above) to find the fee rate effective for November 2016. This fee rate (\$48.88) is used in the next step to calculate the cost of emissions.

Presumptive Minimum Fee Rate (\$/ton) = \$ 48.88 per ton.

⁹ The definition of “regulated pollutant (for presumptive fee calculation)” is found at 40 CFR § 70.2.

¹⁰ Note that 40 CFR §§ 70.9(b)(2)(ii) and (iii) provides exclusions for certain air pollutants and includes a definition of “actual emissions.”

C.a Calculate the Cost of Emissions.aa

Calculate the cost of emissions by multiplying the total tons of “fee pollutants” (value found in A) by the presumptive minimum fee rate (value found in B).tt

$$\begin{aligned}\text{Cost of Emissions} &= \text{“Fee Pollutants” (tons)} * \text{Presumptive Minimum Fee Rate (\$/ton)} \\ &= 15,700 \text{ tons} * \$48.88/\text{ton} \\ &= \$767,416\end{aligned}$$

Value Calculated in Step 1: Cost of Emissions = \$767,416

Step 2 – Calculate the GHG Cost Adjustment (as applicable):

The “GHG cost adjustment” is the cost for the air agency to review applications for certain permitting actions to determine if GHGs have been properly addressed.

A.a Determine the Number of GHG Activities for Each Activity Category.aa

Determine the total number of activities processed during the period for each activity category listed in the following table [based on table at 40 CFR § 70.9(b)(2)(v)].

Activity	Burden Factor (hours per activity)
GHG Completeness Determinations (for initial permit or updated application)	43
GHG Evaluations for Permit Modification or Related Permit Actions	7
GHG Evaluations at Permit Renewal	10

For example, Air Agency X’s records were reviewed to determine the number of activities that occurred for each activity category during FY16:

- tt 2 GHG completeness determinations for initial applicationstt
- tt 46 GHG evaluations for permit modifications or related actions
(11 significant modifications and 35 minor modifications)
- tt 20 GHG evaluations at permit renewaltt

Note that the activities above are assumed to occur for each initial application, permit modification, or permit renewal, regardless of whether the source emits GHGs or is subject to applicable requirements for GHGs. Thus, there were 20 GHG evaluations at permit renewal because there were 20 permit renewals.

B. Calculate the GHG Burden for Each Activity Category.

The GHG burden for each activity category is calculated by multiplying the number of activities for each category (identified in A) by the relevant burden factor (hours/activity) listed in the table above.

$$\text{GHG Burden} = \text{Number of activities} * \text{Burden factor (hours/activity)}$$

For example, Air Agency X calculated GHG burden as follows:

- 2 Completeness Determinations * 43 hours/activity = 86 hours
- 46 Evaluations for Mods or Related Actions * 7 hours/activity = 322 hours
- 20 Evaluations at Permit Renewal * 10 hours/activity = 200 hours

C. Calculate the Total GHG Burden (in hours).

The total GHG burden hours are calculated by summing the GHG burden hours for each activity category determined in B.

For example, Air Agency X calculated total GHG burden hours as follows:

$$\begin{aligned}\text{Total GHG Burden Hours} &= 86 \text{ hours} + 322 \text{ hours} + 200 \text{ hours} \\ &= 608 \text{ hours}\end{aligned}$$

D. Calculate the GHG Cost Adjustment.

Calculate the GHG cost adjustment for the period by multiplying the total GHG burden hours (value calculated in C) by the cost of staff time.

$$\text{GHG Cost Adjustment} = \text{Total GHG burden hours (hours)} * \text{Cost of staff time (\$/hour)}$$

For example, Air Agency X's budget office reported that the average cost of staff time for the Department of Natural Resources (including wages, benefits, and overhead) for FY16 was \$56/hour.

$$\begin{aligned}\text{GHG Cost Adjustment} &= \text{Total GHG burden hours} * \text{Cost of staff time} \\ &= 608 \text{ hours} * \$56/\text{hour} \\ &= \$34,048\end{aligned}$$

Value Calculated in Step 2: GHG Cost Adjustment = \$34,048

Step 3 – Calculate the Total Presumptive Minimum:

Calculate the total for the period by adding the cost of emissions (value calculated in Step 1) and the GHG cost adjustment, as applicable (value calculated in Step 2).

$$\begin{aligned}\text{Presumptive minimum} &= \text{Cost of emission (\$)} + \text{GHG cost adjustment}(\text{\$}) \\ &= \$767,416 + \$34,048 \\ &= \$801,464\end{aligned}$$

$$\text{Total Presumptive Minimum} = \$801,464$$

Conclusion:

\$801,464 is the Air Agency X's presumptive minimum for FY16. This value would be compared against the total part 70 fee revenue for the same period to determine if the total fee revenue is greater than or less than the presumptive minimum.

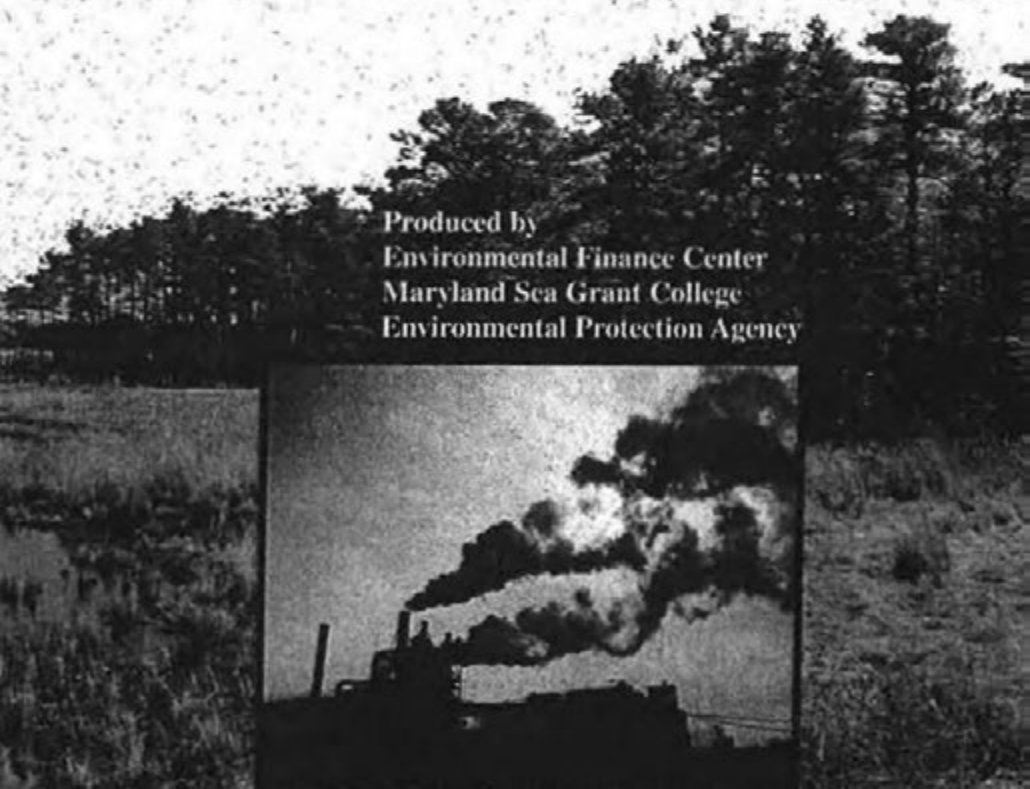
Overview of

CLEAN AIR

Title V Financial Management and Reporting

**A Handbook for Financial Officers
and Program Managers**

Produced by
Environmental Finance Center
Maryland Sea Grant College
Environmental Protection Agency



ACKNOWLEDGMENTS

The production of this booklet is made possible through grant number 993379-01-0 from the Environmental Protection Agency to the Maryland Sea Grant College. We are particularly appreciative of support from the Office of Air Quality Planning and Standards and Region III.

Fund accounts and financial forms in Appendix A are from *Governmental Accounting, Auditing and Financial Reporting*, reprinted with permission of the Government Finance Officers Association, 180 N. Michigan Avenue, Suite 800, Chicago, IL 60601.

Special thanks to Mark Kellett for his help in producing this report.

For additional copies of this handbook, contact:

Environmental Finance Center
Maryland Sea Grant College
University of Maryland
0112 Skinner Hall
College Park, MD 20742



Overview of

CLEAN AIR

*Title V Financial
Management and Reporting*

**A Handbook for Financial Officers
and Program Managers**

**Produced by
Environmental Finance Center
University of Maryland System**

**Supported by
U.S. Environmental Protection Agency
Maryland Sea Grant College**

January 1997

© 1997 by Maryland Sea Grant College
Publication Number UM-SG-CEPP-97-02

Produced by the Environmental Finance Center, University of Maryland System in cooperation with the Maryland Sea Grant College, University of Maryland, College Park.

The Environmental Finance Center (EFC) Network is an association of six universities, created under EPA sponsorship, providing finance training and educational services to state and local officials and small businesses. EFC services are designed to demonstrate ways of lowering the costs of, and increasing investments in, environmental facilities and services. Funding for the network came initially through EPA grants then from other sources as well, such as public agencies and private sources and from fees for training courses, materials, and conferences.

The participating institutions are: the University of New Mexico; University of Maryland System; Maxwell School at Syracuse University; California State University at Hayward; Cleveland State University; and Idaho Universities Policy Group at Boise State.

Printed in the United States of America on recycled paper.

CONTENTS

Introduction	v
Overview of Title V Program Management Challenge	viii

CHAPTER 1

Time Keeping and Cost Allocation	1
Introduction	1
Allocating Title V Costs	4
Time Keeping	7
Lessons Learned by Air Quality Agencies	15
Conclusion	19

CHAPTER 2

Accounting Framework for Title V Programs	21
Types of Funds	23
Government Fund Accounting Reports	29
Accounting for the Title V Program	29
Summary: Pros and Cons of Title V Accounting	
Structure Alternatives	38
Criteria for Evaluating the Need to Modify	
an Agency's Title V Accounting Structure	40

CHAPTER 3

Management Reporting and Tracking	43
Introduction	43
Internal Reporting	44
External Reporting	49
Conclusion	55

Appendix A	59
------------------	----

Appendix B	81
------------------	----

INTRODUCTION

Title V of the Clean Air Act Amendments of 1990 (P.L. 101-549) establishes an operating permit program for stationary sources of air pollution. Title V requires that state agencies and local air programs collect fees from air permit holders to support operation of the permit program. Since the passage of the Clean Air Act, states have been working diligently to address the many challenges associated with the implementation of the Title V program. All states and U. S. territories (6) have submitted operating permit programs to EPA for approval. Most of these programs have been approved.

Among the myriad challenges confronting states in designing and implementing the Title V operating permit program is the need to address associated financial management responsibilities. This document explores the financial challenges air quality agencies face when implementing the Title V program. The goal of the document is to help state, local, and federal air program personnel—especially those with limited financial management experience—to understand the fundamentals of financial management and reporting. It provides an overview of Title V program financial management challenges, discusses generally how states are addressing these challenges, provides state-specific examples of Title V management and reporting practices, and discusses pros and cons of various approaches to financial management.

This overview report was developed to be an introductory guide to key Title V financial management responsibilities — but should not be considered to be formal EPA guidance. The report was developed through a broadly designed interview-survey process that explored the state/local application of general government accounting, budgeting, and financial reporting concepts to the Title V program. The primary target audience for this document includes state and local air quality agencies that are in the process of developing or refining the financial management and reporting aspect of their Title V programs.

The remainder of this report is presented in five sections. The next section provides a brief description of the Title V management challenges as were identified through the research phase of the project. Sections three, four, and five explore the primary financial management challenges. The findings of the study are summarized in the conclusion section of this report.

How Many Air Programs Are There?

There are 56 state (including the District of Columbia and Territories) and 60 local air operating permit programs in the United States. Most states in the U.S. have a single program account for all air program operating procedures, fees, and permits within their state.

In eleven states there are also local air programs. Some states allow these local programs to collect and

distribute their own Title V fees. In other states, however, a state agency collects all Title V fees and distributes them to the local programs. In California, on the other hand, there is no state program at all, and all 34 local permitting authorities submit operating permit programs directly to the EPA.

There are no multi-state Title V permit programs. There are, however, some multi-state boards which discuss certain environmental issues, including air pollution and Title V permits.

**CLEAN AIR ACT
OPERATING PERMITS PROGRAMS**

Region	Number of States/Territories	Number of State Programs	Number of Local Programs
I	6	6	0
II	4	4	0
III	6	6	0
IV	8	8	10
V	6	6	0
VI	5	5	1
VII	4	4	2
VIII	6	6	0
IX	7	7	39
X	4	4	8
Total	56	56	60

STATES WITH LOCAL PROGRAMS

Region	State	Number of Local Programs
IV	Alabama	2
IV	Kentucky	1
IV	North Carolina	3
IV	Tennessee	4
VI	New Mexico	1
VII	Nebraska	2
IX	Arizona	3
IX	California	34
IX	Nevada	2
X	Oregon	1
X	Washington	8

Overview of Title V Program Management Challenges

The introduction of the Clean Air Act Title V Fee Program presented many challenges to state air quality agency personnel, specifically in the areas of financial management and reporting. Historically, these agencies have been involved with the implementation and management of the Section 105 program, funded by federal grants. Conversely, Title V does not provide federal grants to state air quality agencies for program implementation. Instead, the Title V program is designed to be completely self sufficient, relying on fees received from Title V permittees to offset program expenditures. In many cases, the Title V program is the first major fee-based program implemented by state air quality agencies.

Learning to fiscally account for fee-based program revenues and expenditures is the primary challenge facing air quality agencies that have historically dealt primarily with grant-based programs. Further, these agencies must now learn to manage fee-based and grant-based program resources simultaneously. The Title V program requires state air quality agencies to account for Title V resources in a fashion that segregates them from other air quality programs, requiring state agencies to review the methods used to account for program resources.

Based on interviews conducted with state and local air program personnel, the financial management and reporting challenges facing Title V program agencies can be broken down into three categories:

- ***Time Keeping and Cost Allocation.*** As a result of Title V, air quality agencies modified procedures for tracking and distributing labor and non-labor costs among Title V and non-Title V programs. A key challenge these agencies face is addressing the manner in which indirect costs are allocated to these programs.
- ***Accounting Fund Structures and Controls.*** In establishing the Title V program, air quality agencies had to select an accounting fund structure for the Title V program. Different fund structures are recommended for different types of activity by the governmental accounting industry. Also, the fund structure would need to assure the permit program is managed as a segregated set of accounts to assure compliance with the Clean Air Act.

- ***Internal and External Reporting.*** Finally, those agencies implementing the Title V program are developing internal and external reporting procedures for their stakeholders. Assessing the success of the Title V program will rely heavily on the use of sound reporting practices.

These categories follow the natural sequence of actual financial management activities. First, the flow of financial information begins with the initial input of labor cost information in the time keeping process. Next, financial information is organized in the budget and accounting system. Finally, the information is reported in financial and other reports that are generated for internal and external reporting.

CHAPTER 1: TIME KEEPING AND COST ALLOCATION

Introduction

Time Keeping

The ability to accurately track time spent by employees is just as important in the government sector as it is in the private sector. Private sector businesses need to keep track of what their employees are doing — as well as when they are doing it — in order to minimize costs and maximize efficiency. While these goals are also important for governments, sound time keeping procedures also allow government accounting departments and program staff to monitor the labor charges from program to program. Government budgeting and accounting is characterized by strict segregation of the numerous programs.

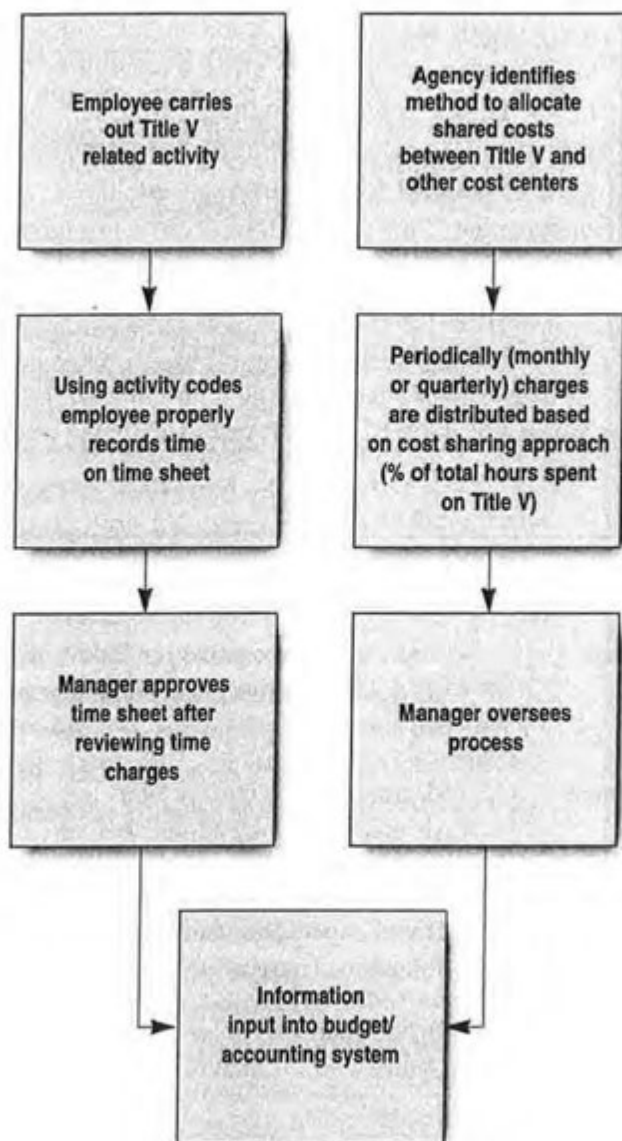
This same argument holds true for the Title V program. Funds to be used to pay the engineers, managers, and administrative staff for working on Title V tasks must come from the Title V program. The only way to ensure the proper segregation of these labor charges is through the use of an appropriately designed time sheet process. Employees record their time on a daily basis by using different time codes, each of which refers to a unique account to which time is charged. After time sheets are submitted, the

total labor hours charged to each project can be calculated, either manually or through a computerized system. Most importantly, this information can then be used by accounting staff and managers alike to monitor the status of Title V, Section 105, or any other specific air quality program.

Cost Allocation

A primary function of any government accounting system is to record accurately revenues and expenditures as they are realized or incurred. Timely recording or posting of account activity is necessary in order to ensure up-to-date accuracy of financial reports that may be scrutinized by a variety of entities. While timeliness is important when measuring the effectiveness of an accounting system, it is also necessary to review the manner in which expenditures are allocated to various revenue sources. The costs of implementing a fee-based program such as Title V should be recovered by the revenues realized through the operation of that same program. In order for this to occur, effective governmental accounting systems need to record all direct and indirect costs associated with program implementation in a manner that allows those costs to be identified or recognized — as a Title V program expense, for example. Once the accounting system has identified the program(s) to which the expense is attributed, the expense can then be allocated, offsetting the corresponding revenue source(s). Figure 1 graphically depicts the flow of information associated with the time keeping and cost allocation process.

**FIGURE 1: COST ALLOCATION
AND TIME KEEPING ACTIVITY**



Allocating Title V Costs

Numerous costs are associated with Title V program implementation, all of which can be allocated in a variety of ways. Direct labor includes those professionals who can attribute all or a portion of their work to the Title V program. Indirect labor includes the administrative and managerial personnel who provide general support for the entire air quality division or department. Direct (non-labor) costs are those costs incurred through the direct implementation of the Title V program. Finally, indirect (non-labor) costs are those costs incurred by the entire air quality division or department that will benefit all air programs. Examples of each of these types of expense are presented below.

Expense Category	Examples
Direct labor	<ul style="list-style-type: none">• Employees responsible for Title V permitting• Air quality engineers conducting permittee inspections
Indirect labor	<ul style="list-style-type: none">• Managers of air quality agencies• Air quality agency administrative support staff
Direct (non-labor)	<ul style="list-style-type: none">• Travel expense to visit Title V permittee• Telephone charges for Title V program tasks
Indirect (non-labor)	<ul style="list-style-type: none">• Office supplies for air quality agency• Utilities for air quality agency

Direct Cost Allocation Overview

Allocating the appropriate direct costs to the Title V program is best accomplished by using time sheets, either manual or automated, that can interact with the government accounting system. With such a system in place, assigning direct costs to various air quality programs is a straightforward process. Air quality department employees fill out time sheets weekly or bi-weekly to reflect the number of hours spent on various tasks. By assigning a unique account charge code to each task, accounting staff are able to track, in detail, the amount of direct labor charged to each air quality program. This information allows accounting departments to reconcile direct labor charges with the Title V program budget and also provides Title V program managers with information on how labor is being distributed across various air quality programs such as Title V, Section 105, and others.

Direct, non-labor charges should be allocated using the same approach. Air quality employees that charge direct expenses, such as travel, to air quality programs can use the same accounting charge code procedures as for direct labor.

Indirect Cost Allocation Overview

Charging indirect labor and non-labor costs to various air quality programs is much more challenging than under the direct cost scenario. In order to maintain efficient and accurate accounting practices, air quality program accountants and managers alike need

to ensure that all indirect costs are recovered, and that they are recovered equitably.

The most practical method of allocating indirect labor costs to Title V and non-Title V programs involves using direct labor charges as an index. Under this framework, indirect labor charges are allocated to Title V and non-Title V programs based on the number of direct labor hours charged to the various air programs. For example, if Title V direct labor charges represent sixty percent of the total direct labor charges within the air quality division, assigning sixty percent of the indirect labor costs to the Title V program is justifiable. It can be assumed that sixty percent of the secretarial and managerial support time is being spent on Title V related tasks under this scenario. Percentage allocations for indirect labor costs can be adjusted weekly or monthly, based on the direct labor charges for that period.

Allocating indirect non-labor costs among Title V and non-Title V is more complicated. As indirect costs are to be shared among a variety of programs, they should be allocated in a manner where the program receiving the greatest benefit from the source of the cost is responsible for the majority of the cost recovery. Unfortunately, this presents a tedious and complicated task for accounting staff. Instead, common practice usually involves the same process as described for indirect labor; as the indirect non-labor costs are allocated based on the percentage direct labor charged to each program. However, some state programs use their own discretion for allocating these

costs, often treating indirect non-labor costs as general overhead and charging to each air quality program equally. State-specific approaches to this type of cost allocation are described in the next section.

State Title V Programs

Accounting personnel from state air quality divisions across the country were contacted in order to determine the common practices regarding cost allocation for Title V and non-Title V programs. The majority of the state air quality agencies interviewed rely on the methods described and recommended in the previous section of this document when tracking time, and allocating and recording costs.

The table on page 8 contains a sample of the states contacted and describes their approach to cost allocation.

Time Keeping

Of the state air quality divisions contacted, all but one require the completion of weekly timesheets to provide accounting and program staff with a detailed account of where time is spent during the week. To complete the timesheet, employees must provide the number of (direct labor) hours worked daily on each particular task, each of which identified by its own unique account/charge code. The level of detail in the account/charge code system varies from state to state, but at the very minimum, the Title V program is represented by its own unique identifier. The majority of the time sheet systems in the state air quality agencies

TITLE V COST ALLOCATION AND TIME KEEPING PROCEDURES

State	Cost Allocation	Time Keeping
<i>Maryland</i>	Non-labor costs are allocated to each program (Title V, non-Title V, 105) based on direct labor charges to each program. Maryland's sophisticated MIS (Management Information Systems) allocates these costs based largely on the Program Cost Accounts (PCAs) employees use to charge their time.	Time sheets are used to allocate labor to appropriate accounts. Title V will also use the PCA system, which drives a number of other fiscal reports as well as indirect charges. Time sheet and financial reporting systems are very closely integrated.
<i>Mississippi</i>	Non-labor costs are allocated to each program (Title V, non-Title V, 105) based on direct labor charges to each program.	Pre-printed time sheets are used and interface with MIS by account code. Employees are prevented from charging non-air-related accounts. Title V is only one account code — more detail is desired by department. Summary reports distributed to program managers monthly.
<i>North Carolina</i>	Non-labor costs are allocated to each program (Title V, non-Title V, 105) based on direct labor charges to each program.	Time sheet system will interface with new accounting software. Time tracking began in 1994 and divides staff time into a number of categories, including Title V. Activity codes are used to identify specific tasks charged to under the Title V category.
<i>Oregon</i>	Non-labor costs are allocated to each program (Title V, non-Title V, 105) based on direct labor charges to each program.	The sophisticated on-line accounting system interfaces with the employee time sheet system, using very detailed task codes to reflect employee charges to Title V.
<i>Pennsylvania</i>	Non-labor costs are allocated based on program staffers' recommendations as to the relative percentages that should be charged to Title V & non-Title V. PA is working on a more exact allocation system.	Time sheets are filled in manually, but contain codes corresponding to low-level tasks for the Title V program. Information is entered into MIS and reports are generated showing expended funds per employee, per task, etc.

are computerized and interface with the other management information system(s) (MIS) in place in the state. This relationship among computer systems allows timesheet information, for example the total number of hours charged to Title V for the week, to be immediately reflected in the Title V budget system.

Figure 2 shows an example of a completed time sheet. In this example, the actual codes and sub-codes used to segregate tasks correctly are shown in the first two columns under the "Project" heading. This particular employee has divided his or her time among six unique tasks, necessitating six unique account codes. The first three activities are "NSR" ("New Source Review") subtasks. The last three project functions listed are OPP (Operating Permit Program) activities. The second column lists the operating permit program activity (section code). Based on this information, accounting and program personnel can review the time sheet and know exactly how much time was spent on each task and to what accounts that time should be charged, all without any guesswork. Figure 2 includes the actual pages from the same air quality agency that list and define the appropriate account sub-codes for the state air activities including the Title V Operating Permit Program.

Labor Costs: Direct

Direct labor, those hours dedicated to a specific task, are accounted for using the time sheet system described above. Employees simply enter the number of hours worked and the account code (or sub-code if



THE FOLLOWING STATEMENT APPLIES
TO ONLY NON-EXEMPT EMPLOYEES
I certify that this statement represents the hours worked
by me each work day and work week of this pay period
and the pay to which I am entitled for this pay period

CERTIFIED BY _____

FIGURE 2

applicable.) After the time sheets are submitted and approved, the actual hours are charged to appropriate Title V or non Title V program.

Figure 2 also shows total direct labor charges for an air quality agency employee. The "Total Hours" line displays the total hours charged for the day and period (two weeks in this case), while the far right column "Total" shows the number of hours spent on each particular task.

AIR QUALITY DIVISION
TIME SHEET BUDGET & ACTIVITY CODES
JUNE 21, 1994

Operating Permit Program
Function Code OPP

Section Code

(Activity) Explanation

INS	Facility Inspections and Report Writing/Staff Review
PAR	Operating Permit Application Review
EIF	Emissions Inventory/fee Assessment
REG	Regulation and SIP Development for Stationary Sources
AMM	Ambient Monitoring — See March 24, 1994 budget Chargeable Work Activities for list of activities.
VIS	Visibility Monitoring
CEM	CEMs Certification and Audits
SKT	Stack Tests Witness and Review

CPL	Review of Facility Compliance Reports
SBA	Small Business Technical Assistance Program
EPA	EPA Reporting
FIL	Filing
AQB	Air Quality Advisory Board
BPT	Budget Preparation and Tracking
CMI	Complaint Investigation (Stationary Source)
ENF	Enforcement prior to Filing in Court
ADM	General Administrative Duties. (Reserved for Administrator Secretaries, Program Manager)

New Source Review (NSR) Function Code NSR

Section Code (Project/Activity)

Assigned

Application # A Unique Application number is assigned for each application corresponding to company name and date of application

ADM General Administrative Duties
(Reserved for Program Mgr. and Administrator)

Non Fee Program (EPA 105 Grant and State General Fund)

Function Code
(Budget) 105

Section Code (Activity) and Explanation

AMM	Ambient Monitoring (See March 24, 1994 Budget Chargeable Work Activities for full list of activities)
ASB	Asbestos and Indoor Air
CMi	Complaint Investigation (Not related to stationary sources.)
REG	Regulation and SIP Development (Not related to stationary sources).
BPT	Budget Preparation and Tracking
ENF	Enforcement Activities-including all enforcement actions for asbestos and work after filing in court for stationary sources.
ADM	General Administrative Duties (Reserved for Administrator, Secretaries, and Program Manager)
RAD	Radiological Activities
RSI	Railroad Safety Initiative

Labor Costs: Indirect

For most of the air quality agencies interviewed, the process of allocating indirect labor cost is based on the direct labor tracking system described above. Labor costs for air quality division managers and

administrative support staff that are not directly attributable to a program activity code are allocated based on the percentage of total labor charged to each of the air programs, e.g., Title V, Section 105, etc. Using the employee time sheet system, the total number of direct labor hours charged to each air quality program is calculated along with the percentage that program represents of total direct labor charges. These percentages are then multiplied by the total number of indirect labor hours charged for the same period, resulting in the proper allocation to be charged to each air quality program. Most air quality agencies interviewed rely on their MIS to perform these calculations, while others make the calculations manually.

Non-labor Costs

Direct non-labor costs are allocated and recorded differently from state to state. Some agency staff that were interviewed rely on the time sheet system to track these costs, usually for travel expenditures that are to be charged to a particular program, e.g., a Title V permittee inspection. Other agencies use an independent expense authorization system to approve, pay, allocate, and record direct costs. Regardless of the subtle procedural differences, all agency staff interviewed use an account/charge code to ensure that the direct (non-labor) costs are charged to the appropriate air quality program, a code that usually differs from that used to allocate and record labor charges within the time sheet system. Additionally, all those interviewed relied on their agency's MIS at some level to charge direct costs to the various air program budgets.

As expected, allocating and recording indirect non-labor costs to the various air quality programs presents a greater challenge to the state agencies contacted. As described previously, indirect non-labor costs would best be allocated among various air programs by assessing the amount of benefit or usage each program realizes as a result of incurring the indirect cost. Again, measuring the relative contribution of each indirect expenditure to each air program could present a unacceptable administrative burden as attempts are made to calculate, for example, the amount of air conditioning costs to be charged to the Title V program. Instead, the majority of the state air quality agencies interviewed relied on the direct labor percentage calculation described above in order to allocate their indirect non-labor costs. The remaining states grouped these indirect non-labor costs into an overhead-like category, distributing the costs equally among all of the air quality programs. Again, all state agencies contacted rely on their MIS at some level to allocate, record, and post these costs to the proper air program budgets.

Lessons Learned by Air Quality Agencies

Although the Title V program is relatively new and state and local agencies are just now beginning to implement the accounting procedures necessary to manage the program, a few lessons have been learned that can provide insight for local air quality agencies as they develop their own programs.

Allocation Methods

Generally speaking, the methods used by various air quality agencies to allocate costs among Title V and non-Title V programs have been in use for many years. The use of time sheets and the practice of indexing indirect labor and indirect non-labor costs to direct labor hours has a long history in both public and private sectors. However, most of the agencies contacted expressed the desire for a more exact or detailed approach to indirect cost allocation. While these agencies, for the most part, were unable to offer any suggestions toward efficient improvements, a few of the agencies were in the process of refining their MIS to allow for greater control over indirect cost allocation, using indices in place of or in addition to direct labor hours.

Some air quality agencies also raised concerns over direct non-labor cost allocation practices. While most charges are easily categorized and recorded as Title V, Section 105, etc., some direct charges, especially those shared among programs, are more difficult to allocate. For example, an air quality engineer incurs travel expenses for a trip to visit a Title V permittee. However, on the same trip, that engineer also performs a site visit under the Section 105 program. To which program should the engineer charge the (direct) travel costs? Indirect costs would be allocated based on direct labor hours, but travel expenses are direct costs and must be charged directly to a specific program. In some states, the answer lies in the engineer's own judgement regarding the extent to which

the trip was primarily to conduct one activity or another. Most states have informal policies or practices in place that result in equal sharing of costs between air program budget centers such as the Title V program and the Section 105 grant program. Regardless of the process that states have devised, it is important to point out that these procedures should be formally documented and communicated to EPA Regional Air contacts. Documentation of the practices will help to minimize any misunderstandings regarding cost sharing approaches.

Account/Charge Codes

Many air quality agencies expressed difficulty in implementing the time sheet system with respect to account/charge codes. Interviews with agency accounting personnel indicated that some time sheet systems contain too many codes, sub-codes, sub-sub-codes, etc. for charging tasks under Title V, or non-Title V programs. In these cases, air quality program personnel are sometimes inconsistent with respect to charging time to identical tasks. This problem is aggravated by the fact that few accounting staff persons are required to understand the subtle differences between these often technical tasks and are unable to correct the MIS-coding singlehandedly.

Conversely, about the same number of agencies claim the account/charge codes are not detailed enough, with a few air quality agencies using only one account/charge code for all Title-V-related tasks. This weakness leaves air program managers without

adequate information concerning the specific tasks with which their employees are involved.

Several agencies indicated that they have already modified their activity code lists to facilitate use and achieve more accurate recording of time and expense charges. It should be expected that agencies will continue to modify their activity codes as they gain more experience with the Title V program and identify ways of improving the process.

MIS/Time Sheet System

Many of the individuals interviewed in air quality agencies are currently working to enhance their management information systems (MIS) and to expand the role of MIS in air quality program management. While all of those interviewed employ MIS to some degree, most are moving towards significant system enhancements that will present budget comparison reports, labor distribution reports, and other financial comparisons in real time, taking into account the most up-to-date data in the system. For all of the state air quality agencies, these enhancements include sophisticated interfaces between the MIS accounting/finance modules and the agency's time sheet system, allowing up-to-date information on labor cost allocation among Title V and other air quality programs.

Report Reconciliation/Review

Finally, most of the air quality agencies expressed the need for a more thorough review process with

respect to the time sheet system and cost allocation procedures. Specifically, air quality agency accounting personnel believe periodic interaction is required between accounting staff and air program staff to ensure that direct and indirect labor and non-labor charges are being allocated and recorded correctly. Because most accounting personnel are not familiar with the technical nuances among programs and tasks, the review of time and cost allocation procedures should include air program managers to ensure that those allocations closely mirror actual program activities.

Conclusion

All of the state air quality agencies referenced in this section have been quite successful in implementing procedures to monitor time and track indirect and direct costs associated with administering the Title V program in concert with other non-Title V programs. Most agencies are relying on methods of cost allocation that have been in use for many years and yield acceptable results, while other states are working to improve the procedures further. The fiscal management of the Title V program will continue to be refined by state air quality agencies as program and accounting staff continue to share knowledge and expanding management information systems take on greater roles.

CHAPTER 2: ACCOUNTING FRAMEWORKS FOR TITLE V PROGRAMS

Government accounting and financial reporting practices differ considerably from those found in the private, commercial sector. Generally accepted accounting principles (GAAP) for government provide strict guidelines concerning the methods used to manage the resources provided by taxpayers. While GAAP standards for business enterprises are designed to provide information needed by investors and creditors, GAAP standards for government are intended to ensure legal compliance as well as security for public resources. In most cases, GAAP standards are accompanied by state accounting rules that must also be followed, resulting in a multi-layered oversight of the government accounting process.

One of the primary differences between government accounting and the private sector is the GAAP-recommended use of fund accounting. According to the Governmental Accounting Standards Board (GASB), a fund is defined as:

A fiscal and accounting entity with a self-balancing set of accounts recording cash and other financial resources, together with all related liabilities and residual equities or balances, and changes therein, which are segregated for the purpose of carrying on specific activities or attaining certain objectives in accordance with special

regulations, restrictions, or limitations. (Source: GASB Codification of Governmental Accounting and Financial Reporting Standards, Section 1300)

Simply stated, fund accounting is the practice of separating the record keeping activity of any number of individual funds. A fund can be viewed as a fiscal entity with segregated accounting records used to implement a specific program or activity. A federal grant, for example, might be accounted for in a separate fund. Most state and local governments have relied on fund-based accounting systems for many years in order to administer and manage a variety of different programs.

Understanding fund accounting is very important to the management of Title V permit programs at the state and local program level. The assignment of a specific fund type to the Title V program by a state/local program establishes the expected level of segregation from other state funds; the degree to which the fund is meant to be a self-supporting, business-type enterprise; and the types of reports that will be available for internal and external reporting.

This section is designed to familiarize state and local program managers with fund accounting as it relates to the operation of Title V programs. It provides an explanation of fund types that are available for use by states, describes the accounting approach that states and local programs are now using, and presents criteria for evaluating the need to modify a state's accounting structure.

Types of Funds

In general, governments can choose from generic types of funds to manage programs. These fund types are generally divided into four categories: Government Funds, Proprietary Funds, Fiduciary Funds and Account Groups. Each type of fund has its own characteristics and is used for different government activities and programs.

Figure 3 provides a graphical summary of the organization of government funds.

Government Funds

The largest fund category, government funds are used to account for all general government operations, such as fire and police protection, public works, parks, and recreation. There are five fund types within this category:

1. The *General Fund* is the chief operating fund of a state or local government and is used to account for all program resources that are not accounted for in other funds. The government uses only one general fund, containing the majority of its financial transactions.
2. *Special Revenue Funds* are used to account for finances that are legally restricted or earmarked for specific purposes, such as the state implementation of an

environmental mandate. For example, a federal grant most likely would reside in a fund of this type.

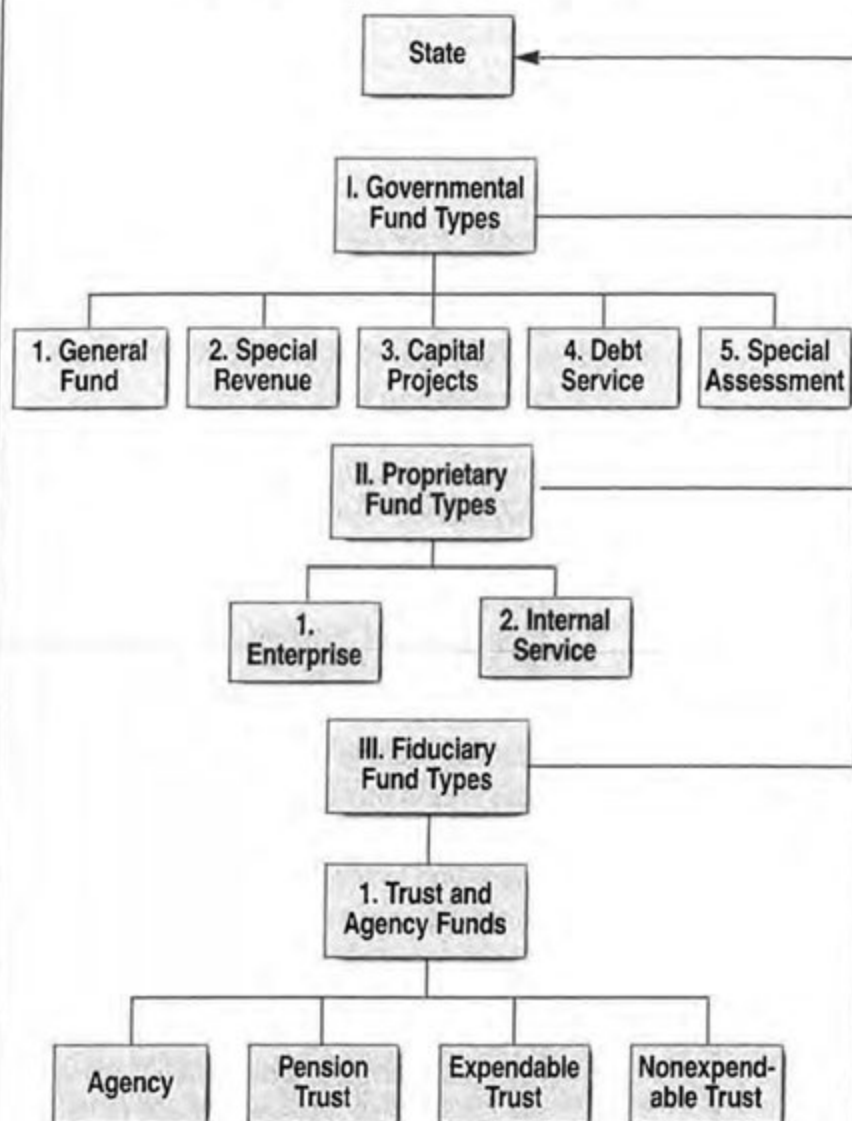
GASB states that special revenue fund types may be used:

to account for the proceeds of specific revenue sources that are legally restricted to expenditure for specific purposes. (Source: GASB Codification of Governmental Accounting and Financial Reporting Standards, Section 1300.104)

It should be noted that the definition of a special revenue fund is permissive, not prescriptive. A special revenue fund *may* be used under government program circumstances described above, but it is not a requirement. Many governments do not use special revenue funds, choosing instead to report (restricted) activities in their general fund. However, the benefits of special revenue fund accounting over that of the general fund will be examined later in this document.

3. *Capital Projects Funds* account for finances used for major capital development. Governments usually prefer to account for these resources in funds separate from other operations.
4. *Debt Service Funds* are used to account for the repayment of government long-term debt, such as major bond issuances.

**FIGURE 3:
FUND ORGANIZATION CHART**



5. *Special Assessments Funds* account for the funding obtained through special assessments for public improvements. For example, after levying a special assessment tax for a new sidewalk, the funds are accounted for here.

Proprietary Funds

In general, proprietary funds are used to account for those government activities and programs that are similar to the private commercial sector, such as a transportation system or water system that receives direct payment for services.

1. *Enterprise Funds* are used to account for activities that are operated much like private sector business enterprises. Governments need to charge users for a variety of public services to recover all or a portion of the costs associated with a particular program or activity. Public utilities are a popular example of an entity fiscally managed within this type of fund.

According to GASB, this type of fund may be used:

to account for operations (a) that are financed and operated in a manner similar to private business enterprises — where the intent of the governing body is that the costs (expenses, including depreciation) of

providing goods or services to the general public on a continuing basis be financed or recovered primarily through user charges; or (b) where the governing body has decided that periodic determination or revenues earned, expenses incurred, and/or net income is appropriate for capital maintenance, public policy, management control, accountability, or other purposes. (Source: GASB Codification of Governmental Accounting and Financial Reporting Standards, Section 1300.104)

The benefits of using enterprise funds to account for the Title V program will be presented in the next section.

2. *Internal Service Funds* account for operations similar to those found in an enterprise fund, but for entities that provide goods and services to other government departments. Government printing and data processing are examples of activities accounted for in these funds.

Fiduciary Funds

Fiduciary funds are used to account for assets held by the government as a third-party trustee or agent. Examples of the funds accounted for include government pension plans and willed assets.

1. *Trust and Agency Funds*

- *Agency Funds* are used to account for non-government assets or assets belonging to another government, such as a county that collects taxes on a county-wide basis.
- *Pension Trust Funds* account for government pension plans
- *Expendable Trust Funds* account for government assets that have been provided to that government via a trust or other agreement. Under expendable trusts, interest and principal may be expended based on the provisions of the agreement. Assets left to the government are often placed in this type of fund.

The use of expendable trust funds to account for Title V program resources will be presented in the next section.

- *Nonexpendable Trust Funds* are similar to expendable trusts, except that only interest earnings may be expended, leaving the original principal intact.

Government Fund Accounting Reports

All of the government funds described above are designed to ensure effective accounting for public monies. In order to test this objective, governments rely on financial reports. Stakeholders, which include tax payers, government accounting departments and program personnel to name a few, have a vested interest in the status of fund resources. The creation of periodic financial reports such as balance sheets, revenue/expenditure statements, budget vs. actual comparisons, etc. provide important information. More specifically, these reports can be used to verify that specific programs, such as Title V, are being implemented efficiently and in accordance with government accounting standards.

As described in the following section, the reports that can be generated and subsequently used to account for the resources of a government program vary slightly based on the specific government fund type used.

Accounting for the Title V Program

State and local air quality agencies are concerned with how Title V resources are managed. First of all, agency managers need to know that the program is being managed in such a way that user fees are covering program costs. They also need to know that Title V staff time and expenses are being covered using Title V resources and, conversely, that non-Title V program expenses are not being recovered through the Title V program. Not only is this information valuable

to the air quality agencies administering the Title V program, but also to a number of other stakeholders, including the Title V permittees, state and local government officials, USEPA, and the general public, each of which has an interest in the efficient and effective operation of the Title V program.

As long as the particular government fund complies with GAAP and state or local requirements, there are no restrictions as to which accounting fund encompasses the Title V program. However, while there are numerous fund types in governmental accounting, only a few can be considered viable for Title V accounting based on the GASB definition of the fund types. In the governmental fund type category, possible candidates include the general fund and a special revenue fund, though it is likely that general fund accounting for a Title V permit program would be considered inappropriate because of the lack of earmarked fund segregation (see below). Capital

**TITLE V PROGRAM ACCOUNTING:
APPROPRIATE GOVERNMENT FUND TYPES**

Fund Category	Fund Type
Governmental Funds	<ul style="list-style-type: none">• General Fund• Special Revenue Fund
Proprietary Funds	<ul style="list-style-type: none">• Enterprise Fund
Fiduciary Funds	<ul style="list-style-type: none">• Expendable Trust

projects, debt service and special assessment funds serve purposes dissimilar to those of the Title V program. In the proprietary fund category, Title V could be accounted for using an enterprise fund, but not an internal service fund. In the fiduciary fund category, a state might adopt an expendable trust fund that could account for the Title V program, but agency funds, pension trust funds and nonexpendable trust funds would not be used. A summary of the fund types eligible to account for the Title V program is shown below.

General Fund

The general fund is comprised of a large number of accounts associated with the general services required by any state or municipality. This fund includes accounts for police and fire protection, parks, public areas, and any other government program or activity that is not accounted for elsewhere in the accounting system. If the Title V program were to be fiscally managed from the general fund, it would be identified as an independent account, separate from other general fund accounts. All revenue and expenditure activity such as permit fees (receipts) and the costs of operating the program (staff salaries, for example) would flow in and out of the Title V account within the general fund. Funds would not flow to or from the Title V account to or from any other general fund account without some sort of legislative approval.

While it would be considered acceptable under GASB to use the general fund to account for the Title V program, it is clearly not the best choice. First of all, Title V program reporting is not as detailed when

using the general fund. Under this scenario, Title V is merely one of a large number of accounts, and while general information on the program's fiscal activity is available through the general fund financial reports, the information is not as robust as it would be under another government accounting fund type.

More importantly, most government general funds do not restrict the movement of resources among the many general fund account groups and accounts. Further, it is a common government accounting practice to reallocate program resources among general fund accounts. Title V resources must be accounted for separately, without interaction between any other accounts. This requirement makes the general fund an unattractive option for Title V accounting.

Of the state air quality agencies interviewed, none uses the government's general fund to account for the Title V program, based on the limitations described above. Appendix A contains illustrative general fund statements that show the types of reports included as part of the general fund process.

The types of general fund reports provided as part of a comprehensive annual financial report include the following:

The statement of revenues, expenditures, and changes in fund balance. This statement reports the financial performance of the entity over the annual reporting period. It is meant to communicate the sources, uses, and balances of current

financial resources used to run general government operations.

The balance sheet. This report is best viewed as a snapshot in time of the entity's financial position. It presents the balance between governmental assets and liabilities and fund equity.

Standard accounting formats include presentation of combining statements that group all sub-funds into a summary report as well as separate statements on component units.

Because Title V is a new program specific illustrations of financial statements are not yet available. In order to illustrate the way the statements will be presented, illustrative general fund financial statements have been included as an appendix to this report.

Special Revenue Fund

The decision to select one particular fund type over the others has been primarily credited to historic precedent. Grant-funded programs and activities, such as the Section 105 program, have been accounted for by state and local governments through special revenue funds as common practice for many years. While the Title V program does not involve the management of federal grants, many air quality agencies have viewed Title V as a "sister program" of sorts to the Section 105 program. Subsequently, Title V resources have been managed through the same government accounting fund type — the special revenue fund — as

the Section 105 program. In nearly all state and local air programs contacted, the Title V program is managed within a special revenue fund.

Special revenue funds are the backbone of government accounting structures, as most governments operate numerous special revenue funds to implement a variety of programs and activities. As stated previously, special revenue funds account for financial resources, often in the form of federal grants, that are in some way restricted or ear-marked for a specific government purpose. The permit fees that flow into the state Title V programs are restricted just as a federal grant would be, even though these funds originate from private sector permittees and not the federal government. Because Title V revenues may not be used for any purpose other than the implementation and management of the Title V program, a special revenue fund is an appropriate accounting entity. All revenues and expenditures flowing in and out of the Title V special revenue account are used solely for that program and may not be co-mingled with any other special revenue fund without state legislative approval.

Governments may also account for Title V resources using a Title V account *within* an existing special revenue fund. Under the scenario described above, the Title V program is accounted for through the management of its *own* special revenue fund. Conversely, governments may account for Title V simply as an account within a special revenue fund possessing similar restrictions, such as a Clean Air special revenue fund that accounts for resources for

Title V and non-Title V programs. In this situation, Title V (account) resources are restricted for use only within Title V programs and may not be transferred outside of the fund without state legislative approval. This structure is often used for agencies in which the Title V program is not large enough to justify segregation into a separate fund.

With only one exception, all state air quality agencies interviewed use the special revenue fund to account for the Title V program. Most of the agencies account for Title V by utilizing a separate special revenue fund (Title V only), while the remaining use a separate Title V account within an existing (multi-program) special revenue fund. Appendix A presents illustrations of special revenue fund reports. Because they are part of the general fund, they are presented both as a component of the combining statements for the general fund and as individual special revenue funds.

Enterprise Fund

Enterprise funds are used to account for governmental programs and activities that are similar in nature to private sector commercial transactions. Services that require a cash outlay from the purchaser, as opposed to those services provided via tax revenues, are generally accounted for within enterprise funds. Good examples of these business-like services are public transportation systems and public utilities. Although Title V programs could fall into this category, no states are currently using an enterprise fund structure for Title V programs. Pending changes by

the accounting regulators may, however, change this in the near future.

The Government Accounting Standards Board (GASB) is in the process of modifying the requirements for the use of enterprise funds. Due out in mid-1997, the new requirements will encourage a broader use of enterprise funds for self-supporting activities. If the new requirements are passed by GASB, it is possible that Title V programs would need to be classified as enterprise funds by states to be in full compliance with GAAP. GASB language as now drafted is as follows:

Business-type activities should be reported as proprietary (enterprise) funds. To provide more consistency among governments, the circumstances under which enterprise accounting may or should be used are revised as follows:

Any activity that charges a fee to users for its services may be reported using enterprise fund accounting and financial reporting. An activity is required to be reported using enterprise fund accounting and reporting if any one of these criteria is met:

- a. The activity issues debt that is secured solely by a pledge of the net revenue from fees and charges of the activity.*
- b. State or local laws or regulations require that the activity recover the costs of providing services, including capital use charges or debt service, with fees and charges.*

- c. *The pricing policies of the activity establish fees and charges designed to recover the costs of providing services, including capital use charges or debt service. (Source: Preliminary Views of the Governmental Accounting Standards Board on Major Issues Related to Governmental Financial Reporting Model: Core Financial Statements, June, 1995)*

Because Title V permittees pay fees directly to the Title V program's administering air quality agency, as opposed to paying for the government program via income taxes or other sources, the program acts much like a commercial enterprise. Thus, an enterprise fund may ultimately be the structure used for Title V fee programs.

Enterprise fund accounting includes the use of financial reports that are not found under other government fund accounting scenarios, providing information to stakeholders from a more business-like perspective. Specifically, enterprise fund accounting features "Statement of Cash Flows" reports that would be useful in showing the movement of resources in and out of the Title V program. Accounting statements provided as part of an enterprise fund are included as part of Appendix A.

Expendable Trust

Expendable trusts are employed by governments to account for resources provided to the government under a trust agreement for implementation of a specific objective. These resources are often in the form of gifts or donations to the government, but have also historically taken the form of federal grants. As opposed to a non-expendable trust, both principal and interest of expendable trust resources can be expended in accordance with the trust agreement.

Title V resources can be accounted for under an expendable trust structure. While the Title V program does not provide any gifts or direct grants to be entrusted to the state governments, the program does result in revenue generation through permittee fees. These fees become the resources of the trust and can be expended only to implement the Title V program.

One of the state air quality agencies interviewed uses an expendable trust to account for the Title V program.

Summary: Pros and Cons of Title V Accounting Structure Alternatives

While the four government fund options discussed may be used for the Title V program, some are clearly better than others. The table below summarizes the strengths and weaknesses of each option for use in the Title V program.

Fund Type	Strengths	Weaknesses	Reports	Usage by Agencies Interviewed
General Fund	Easily implemented; all states have general funds in place.	Funds can be moved from one account to another with ease — a violation of Title V guidelines.	Statement of revenues, expenditures, and changes in fund balance; balance sheets; budget vs. actual.	None
Special Revenue Fund	Funds are segregated. Generally requires legislative or gubernatorial approval to move to between funds.	Creates another reporting entity; many states have numerous special revenue funds. Does not report on cash flows.	Statement of revenues, expenditures, and changes in fund balance; balance sheets; budget vs. actual.	All states but one (16 of 17)
Enterprise Fund	Behaves much like a commercial business enterprise. Emphasis is balancing resources with expenses. Higher implied level of segregation. Allows cash flow reporting.	Generally not used for small programs such as Title V.	Statement of revenues, expenditures, and changes in fund balance; balance sheets; budget vs. actual; statement of cash flows.	None
Expendable Trust Fund	Funds are segregated for specific purpose. Provides same reports as enterprise fund accounting.	Not originally intended for fee-based programs, historically used for federal grants.	Statement of revenues, expenditures, and changes in fund balance; balance sheets; budget vs. actual; statement of cash flows.	One agency (1 of 17)

Criteria for Evaluating the Need to Modify an Agency's Title V Accounting Structure

As most state and local air programs are just beginning to work with accounting procedures for the Title V program, few have had the opportunity to assess whether or not the selected accounting structure (fund type) is acceptable in terms of meeting the requirements of the program itself and providing accounting staff and Title V program managers with information needed to accurately monitor costs.

In order to assess the adequacy of the Title V accounting program, air programs should ask the following questions:

- Does the current accounting structure ensure that Title V resources are being managed and reported on independently of all other non-Title V programs?
- Do accounting managers within the state or local agency foresee any possibility that Title V funds could be transferred to another account for unauthorized use? If so, which fund structure within the agency provides the highest level of protection from transfers?
- Does the current accounting structure allow for the creation of reports that are meaningful to air quality agency managers and other stakeholders such as permittees and USEPA?

- Is the current accounting structure flexible enough to allow changes in reporting procedures — for example, to correct any inadequacies?

The answers to these questions may indicate that a change in accounting structures is necessary in order to manage the Title V program more effectively.

CHAPTER 3: MANAGEMENT REPORTING AND TRACKING

Introduction

Managerial reporting is one of the most important activities in both the private and public sectors. The presentation of current, accurate information to the stakeholders of a private business or government program can literally make the difference between bankruptcy for the private business or program ineffectiveness for a government agency.

Many academics and business leaders alike agree that information is the most important resource in any entity, private or public. For example, a manufacturing business needs information on how costs are allocated among different products, just as Title V program managers are interested in identifying how program personnel spend their time among Title V and non-Title V programs. These examples reflect the need for “internal” reporting — providing information to those within the organization.

Similarly, information is required by those outside the organization that have an interest in the success of the program. A bank is not going to loan a business millions of dollars without first taking a look at the financial position of the operation. Similarly, stakeholders in the Title V program including permittees, the state legislature, and the federal government need

to know that financial resources are being used as intended by the U.S. Congress in the Clean Air Act. These two examples show the necessity of “external” reporting — providing information to stakeholders outside of the organization.

This section represents the third of the three steps in the natural sequence of financial management and reporting activities. Internal and external reporting logically follows the activities that occur in the first two steps. To recap, the first step involves gathering the accounting information via tools such as time sheets and recording the direct and indirect labor and non-labor costs as they are incurred. The second step entails introducing the cost information to the particular government fund put in place to manage the Title V program. Once the information has been gathered and posted to the fund, it is time to put that information to work in the form of financial reports for internal and external usage.

Step 1: Gather time keeping/cost allocation
information

Step 2: Post information to Title V
accounting fund

Step 3: Develop internal and external
financial reports

Internal Reporting

Internal reporting procedures allow important program and accounting information concerning the Title

V program to be disseminated throughout the air program. This sharing of information accomplishes several important objectives, including: (1) it allows program and accounting personnel to understand the status of the Title V program in a timely manner, and (2) it helps identify those areas of the Title V program in need of modification or improvement. This second point is significant as the Title V program is quite new and its constant improvement will require the sharing of information throughout the administering agency.

The Financial Reporting System

As described above, financial reporting represents the third of three main steps to the financial management and reporting process. Subsequently, the activity that occurs in this final step is a function of what happens in the first two. Most financial reporting systems are set up to provide a standard set of budget and financial statement reports for internal users, based on the type of governmental accounting fund in use. For example, if the Title V program is accounted for as a special revenue fund, the standard reports accessible via the accounting system include balance sheets, statements of revenues, expenditures and changes in fund balance, and budget versus actual reports. The reports, usually generated monthly, are based on (1) the information provided through recordation of permit fee receipts, time sheet and cost allocation practices and (2) the type of government fund in use for Title V accounting. Because of governmental accounting standards, all air programs have the ability to create these reports through their accounting systems, showing Title V-specific information. Some have the

ability to access the information on line. Appendix A shows examples of the types of standard reports that can be generated through the government financial reporting system.

Specialized Financial Reporting

The reports described in the previous section are very important to the air program staff, providing information concerning Title V fund account balances and actual expenditures and revenues to date. Interviews conducted with air program staff revealed, however, that reports customized to fit various individual needs of the users beyond those offered by a traditional reporting system can also be extremely useful. For some agencies, these specialized reports include:

- Summaries of Title V obligations and encumbrances
- List of permittees and fee revenues generated
- Account balances by object code

Specialized reports such as these are extremely useful to air program managers as they implement a new program such as Title V for two main reasons. First, the nature of a fee-based program involves constant monitoring of the balance of revenues and expenditures, necessitating up-to-date information on permit fee revenues and labor cost allocation, for example. In order to recognize whether or not the permit fees are adequately offsetting program expenditures, a specialized level of reporting is needed. Second, specialized reports

can be used to monitor internal performance characteristics of the Title V program itself. The amount of direct labor spent per Title V permittee, for example, may be useful information to Title V managers as would a summary of Title V indirect cost allocation.

While most of the agencies interviewed desire the ability to generate custom reports, few are able to accomplish this objective with their current management information systems (MIS). For many states, generating customized reports entails submitting a formal request to the accounting or MIS department that describes the financial information requested. Delivery of the report can take up to two weeks in some cases, often resulting in information that is too dated to be of much use. A few states, however, have sophisticated MIS in place that allow a large variety of specialized financial reports to be generated on-line, in real time. In these cases, the financial reports reflect the most up-to-date information possible.

The state of Wyoming provides a good example of the usefulness of customized financial reports. Three different financial reports are generated by Wyoming's MIS. Each of the reports displays accounting information not contained in the standard special revenue fund reports described in the previous section. Wyoming's system provides another filter to the data, subsequently giving Title V program managers detailed information on the status of their fee-based program. The first page of the system includes a Summary of Obligations representing the costs with the amount expended or encumbered, and the remain-

ing balance. The last line of the first page shows the Title V fees that are available to cover these costs. This information is crucial to managers of a fee-based program, as it provides cash flow information. The last two financial reports present detailed information on Title V permit program expenditures, again, information that is more detailed and more useful than the standard special revenue fund reports.

Summary: Internal Reporting

In order to effectively manage resources, Title V agencies need access to different types of internal reports: those general purpose statements that are available through the government fund accounting system, and specialized financial reports that can be created by Title V managers to provide detailed information lacking in the general purpose reports. Generating customized financial reports is best accomplished through the use of a sophisticated MIS that can provide the detailed information on-line.

Interviews of air program personnel yielded the following general information regarding internal reporting:

- Most Title V programs are incorporated into state environmental department-wide general purpose financial statements (balance sheets, statements of revenues and expenditures, etc.) on a regular basis, via their government fund accounting systems. Financial reports specific to the Title V fund can be requested by state or local permit program managers.

- Most Title V agencies expressed the need for more specialized internal financial reports.
- A few agencies have the ability to generate detailed, specialized financial reports by using sophisticated MIS; the remaining must submit formal requests for such customized reports and sometimes must wait weeks to receive them.

As air programs begin to identify areas for improving their implementation of the Title V program, the variety and detail of internal reports will most likely increase.

External Reporting

External reporting is the practice of providing information to entities outside of a business or agency. For various reasons, stakeholders like to be kept informed as to the financial status of a public or private entity. For the Title V program, stakeholders that may wish to review the administering agency's financial reports include Title V permittees, state legislatures, or USEPA.

Title V External Reporting Status

In general, external reporting procedures for the Title V program have yet to be developed for a couple of reasons. First, as the Title V program is relatively new, states have been concentrating on designing and implementing the program itself. In order for external reporting to be meaningful, Title V program administrators first need to get the program established and

develop measurement criteria that stakeholders will find useful. Secondly, Title V stakeholders have yet to place external reporting demands on the air programs. Stakeholders, Title V permittees in particular, appreciate the fact that the program is still under development and agency personnel are concentrating on implementation for the time being.

Governmental Reporting Procedures

Any description of external reporting responsibilities for government agencies would be incomplete without mentioning the CAFR. The Comprehensive Annual Financial Report (CAFR) is a detailed report that encompasses the fiscal activity of every fund and account group used by the government. The National Council on Governmental Accounting (NCGA) requires completion of a CAFR each year to provide very detailed accounting information to a wide audience. In addition to the information concerning government accounting activity for the year, the CAFR also presents other general and statistical information. A key characteristic of the CAFR is that it presents audited financial statements for the state or local government.

Through the structure of government fund accounting and management information systems, accounting information on the Title V program is provided to upper levels of the governmental entity. This information is then summarized and becomes part of the CAFR. In most cases, the Title V-specific information is not readily identifiable in this report, even though many Title V programs are accounted for

in their own special revenue funds. While the CAFR presents information on all special revenue funds, most Title V programs are far too small in comparison to other funds to be listed separately. Subsequently, the Title V accounting information is buried within another special revenue fund summary.

External Oversight Committees

As mentioned above, typical external reporting techniques have yet to materialize for the Title V program. However, many agencies have formed external (third-party) oversight committees to help monitor the fee-based Title V program from a multiple-stakeholder perspective. These committees will most likely be the impetus to the development of external reporting procedures. A number of the agency personnel interviewed have set up these committees, which are composed of Title V permittees, state legislators, and other regulatory representatives. The mission of the oversight committees is to help the Title V administering agency develop a program that addresses the needs of all stakeholders, one of those needs being the access to information.

To restate, stakeholders have yet to put pressure on Title V agencies for external reporting. As the Title V program takes shape, stakeholders will become more interested in receiving up to date program information such as:

- Current fee levels
- Costs associated with program implementation

- Expenditure and revenue reconciliation
- Various performance indicators

Simply stated, the stakeholders, especially those that have mobilized into forming oversight committees, will want to know where their fees are going and how efficiently they are being used to administer the fee-based Title V program.

External Reporting: Measuring Performance

A challenge that will face Title V agencies as they develop external reporting procedures is identifying and measuring program performance criteria. Once Title V programs are implemented and underway, it is safe to assume stakeholders will soon be demanding financial and performance-based reports. Title V stakeholders may desire performance-based reports that answer questions such as:

- How many labor hours does it take to implement the Title V program for each permittee?
- How many days does it take to review a Title V permit?
- Are Title V-related labor and other costs decreasing or increasing over time compared to workload?

The air programs must take great care when developing their external reporting program, as the applicability of cost and performance data may vary widely across the Title V program. For example, a report showing the relationship between the total number of

permittees and the annual cost of Title V program implementation may provide misleading information as the required amount of labor hours (cost) may vary among Title V permittees.

For the most part, the benefits of performance tracking outweigh the potential pitfalls described above. States should work hard to develop external reporting processes that provide meaningful measures of performance, while still meeting the needs of Title V stakeholders.

External Reporting: New York as Example

The State of New York's Department of Environmental Conservation develops an annual report for the New York State Operating Permit Program (Title V). Selected portions are included in Appendix B. The New York report is a useful example of external reporting in practice. Presented each year to the New York State Legislature, the Governor and the Office of the State Comptroller (stakeholders), the report summarizes the Title V program's activity and includes both fiscal and performance-based criteria, such as the estimated versus actual costs of program implementation, the average number of permits issued annually, as well as future fiscal year projections.

Summary: External Reporting

Most agencies are in the process of implementing and refining their Title V programs and have not yet addressed external reporting. However, based on the

interviews conducted, the following similarities have been identified:

- Stakeholders such as permittees and regulatory agencies have not yet demanded external reporting from the Title V agencies as the program continues to be implemented.
- Governmental fund accounting systems support external reporting to be used for the Comprehensive Annual Financial Report (CAFR). However, due to the relatively small size of the Title V program, it is rarely identified in the CAFR.
- Some agencies have organized oversight committees to provide feedback to Title V-administering agencies. These committees will be the driving force in the creation of external reports for stakeholders in those states.
- Agencies will need to begin to develop external reporting to respond to requests from stakeholders.

CONCLUSION

The Clean Air Act Title V Operating Permit Program presents new requirements for state and local air quality agencies. Most of these requirements are a challenge to agencies that have historically managed grant-based programs such as Section 105. Fee-based programs need special considerations in terms of time keeping, cost allocation, accounting fund type selection, and reporting.

This study found that state and local air programs are making great strides in addressing the many financial management challenges associated with the Title V program. However, because the program is beginning the implementation phase, it is likely that state and local programs will need to adjust the financial management of the program as they gain more experience.

Conditions in the three primary financial management activities identified in the study are as follows:

1. Time Keeping and Cost Allocation

- Air quality agencies must refine procedures for tracking labor and non-labor costs among Title V and non-Title V programs. Of those interviewed, all but one agency utilize time sheets to record labor costs incurred for Title V and non-Title V programs. Some of these systems are very sophisticated and interact with the management information system (MIS) to generate detailed reports.

- These agencies must also address the manner in which indirect costs are allocated to these programs. All individuals interviewed have procedures in place to record and allocate indirect labor and non-labor costs to appropriate Title V and non-Title V program accounts. State and local programs would benefit from documenting these procedures if they have not done so.

2. Accounting Fund Structures and Controls

- Air quality agencies must review their accounting structures and assess whether the current procedures are adequate for managing the resources of a fee-based program or if new accounting methods are required for program efficiency and/or compliance with Title V requirements.
- All agencies interviewed are currently employing acceptable methods of accounting for Title V resources independently of non-Title V programs. All but one of the agencies interviewed rely on special revenue accounts for Title V program management, while the remaining agency accounts for Title V via an expendable trust fund. Agencies should be aware that government accounting regulators may impose a fund definition that would necessitate a change in the Title V fund structure — changing Title V to an enterprise fund. Such a change will result in financial

reports for Title V that more closely reflect the fact that the Title V program is user fee supported.

3. Internal and External Reporting

- Agencies are challenged with identifying the financial data they require in internal program reports to manage the program. While the budget process will provide regular reporting on encumbrances against account codes, other detailed information will be available through the accounting system to evaluate costs and revenues on a regular basis.
- Many state and local programs have yet to become adept at manipulating the accounting system to provide management information. However, where programs are further along in implementation, it seems that internal tracking information is more readily available.
- External reporting is an area that, to a great extent, has not developed at the state and local level. As the programs move from the start-up period to the operation period, interests in providing external information will increase. While there are difficulties in overly simplistic performance measures that do not consider the normal variability of individual activities, the development of useful summary performance information is a worthwhile endeavor that Title V programs should undertake.

APPENDIX A

Excerpted from Governmental Accounting, Auditing and Financial Reporting (Government Finance Officers Association).

GENERAL FUND

The general fund is used to account for resources, traditionally associated with government, which are not required legally or by sound financial management to be accounted for in another fund.

NAME OF GOVERNMENT GENERAL FUND

Comparative Statements of Revenues, Expenditures
and Changes in Fund Balances
For the fiscal years ended December 31, 19X4 and 19X3
(amounts expressed in thousands)

	19X4	19X3
Revenues:		
Taxes:		
Property	\$14,133	\$13,886
Sales	6,642	5,253
Franchise	4,293	4,126
Licenses and permits	2,041	1,820
Intergovernmental	5,770	4,469
Charges for services	2,300	2,335
Fines	808	521
Interest	623	476
Contributions	145	—
Payments in lieu of taxes	365	314
Drug forfeitures	75	—
Total revenues	37,195	33,200
Expenditures:		
Current:		
General government	4,232	3,844
Public safety	13,438	13,150
Highways and streets	3,735	3,389
Sanitation	3,726	3,404
Culture and recreation	5,899	6,167
Debt service:		
Principal	15	—
Bond issuance costs	150	—
Total expenditures	31,195	29,954
Excess of revenues over expenditures:	6,000	3,246

	19X4	19X3
Other financing sources (uses):		
Operating transfer in-electric fund	1,576	—
Operating transfers out:		
Debt service fund	(3,327)	(3,331)
Pipeline construction fund	(1,210)	—
Component unit	(25)	—
CDBG revitalization project fund	(63)	—
Capital leases	140	—
Sales of general fixed assets	5	—
Total other financing sources (uses)	(2,094)	(3,331)
Excess (deficiency) of revenues and other financing		
sources over (under) expenditures		
and other financing uses	3,096	(85)
Fund balances, January 1	1,807	1,892
Residual equity transfers out—fleet		
management fund	(45)	—
Fund balances, December 31	\$ 4,858	\$ 1,807

The notes to the financial statements are an integral part of this statement.

NAME OF GOVERNMENT GENERAL FUND

Comparative Statements of Revenues, Expenditures and
Changes in Fund Balances – Budget and Actual
For the fiscal years ended December 31, 19X4 and 19X3
(amounts expressed in thousands)

	19X4			19X3		
	Budget	Actual	Variance Favorable (unfavorable)	Budget	Actual	Variance Favorable (Unfavorable)
Revenues						
Taxes:						
Property	\$14,007	\$14,133	\$ 126	\$13,844	\$13,886	\$ 42
Sales	5,900	6,642	742	5,198	5253	55
Franchise	4,312	4,293	(19)	4,124	4,126	2
Licenses and permits	1,827	2,041	214	1,503	1,820	317
Intergovernmental	5,661	5,770	109	5,395	4,469	(926)
Charges for services	2,158	2,300	142	2,095	2,335	240
Fines	810	808	(2)	487	521	34
Interest	555	623	68	520	476	(44)
Contributions	—	145	145	—	—	—
Payments in lieu of taxes	345	365	20	314	314	0
Drug forfeitures	—	75	75	—	—	—
Total revenues	35,575	37,195	1,620	33,480	33,200	(280)
Expenditures:						
Current:						
General Government						
Council	110	92	18	94	113	(19)
Commissions	86	64	22	71	63	8
Manager	490	505	(15)	426	414	12
Attorney	380	387	(7)	216	206	10
Clerk	275	250	25	247	237	10
Personnel	356	304	52	274	249	25
Finance and admin.	904	868	36	846	830	16
Other-unclassified	2,256	1,762	494	1,884	1,732	152
Total general gov't.	4,857	4,232	625	4,058	3,844	214
Public safety:						
Police	6,513	6,354	159	6,026	6,801	(775)
Fire	6,040	6,031	9	5,521	5,415	106
Inspection	1,092	1,053	39	970	934	36
Total public safety	13,645	13,438	207	12,517	13,150	(633)
Highways and Streets:						
Engineering	814	796	18	777	762	15
Maintenance	3,052	2,939	113	2,681	2,627	54
Total highways & Sts.	3,866	3,735	131	3,458	3,389	69
Sanitation	3,848	3,726	122	3,426	3,404	22
Culture & recreation	5,950	5,899	51	5,477	6,167	(690)

	19X4			19X3		
	Budget	Actual	Variance Favorable (unfavorable)	Budget	Actual	Variance Favorable (Unfavorable)
Dept. service:						
Principal	—	15	(15)	—	—	—
Bond issuance costs	150	150	0	—	—	—
Total debt service	150	165	(15)	—	—	—
Total expenditures	32,316	31,195	1,121	26,836	29,954	(1,018)
Excess of revenues over expenditures	3,259	6,000	2,741	4,544	3,246	(1,298)
Other financing sources (uses):						
Operating transfers in	1,576	1,576	0	—	—	—
Operating transfers out:						
Debt service fund	(3,400)	(3,327)	73	(3,350)	(3,331)	19
Pipeline constr.fund	(1300)	(1,210)	90	—	—	—
Component unit	—	(25)	(25)	—	—	—
CDBG revitalization proj. .	—	(63)	(63)	—	—	—
Capital leases	—	140	140	—	—	—
Sales of gen. fixed assets .	34	5	(29)	—	—	—
Total other financing sources (uses)	(3,090)	(2,904)	186	(3,350)	(3,331)	19
Excess (deficiency) of revenues and other financing sources over (under) expenditures and other financing uses	169	3,096	2,927	1,194	(85)	(1,279)
Fund balances, January 1 ..	1,807	1,807	0	1,892	1,892	0
Residual	(60)	(45)	15	—	—	—
Fund balances, Dec 31	\$ 1,916	\$ 4,858	\$ 2,942	\$ 3,086	\$ 1,807	\$(1,279)

The notes to the financial statements are an integral part of this statement.

**NAME OF GOVERNMENT
GENERAL FUND**

Comparative Balance Sheets
December 31, 19x4 and 19x3
(amounts expressed in thousands)

	19X4	19X3
Assets	\$3,097	\$ 557
Cash and cash equivalents	2,091	1,226
Investments		
Receivables (net of allowances for uncollectibles):		
Interest	92	48
Taxes:		
Property	86	74
Property—interest and penalties	11	4
Liens	25	19
Sales	830	800
Accounts	72	59
Intergovernmental:		
Federal	—	150
County	215	127
Due from other funds:		
Transportation fund	—	38
Water and Sewer fund	65	193
Fleet management fund	8	—
Due from component unit	12	—
Interfund receivables:		
Fleet management fund	8	—
Management information systems fund	24	—
Inventories	39	37
Advances to other funds:		
Fleet management fund	32	—
Management information systems fund	46	50
Total assets	6,753	3,382

	19X4	19X3
Liabilities and fund balances		
Liabilities:		
Accounts Payable	887	874
Compensated absences	225	201
Contracts payable	67	151
Due to other funds:		
Pipeline construction fund	335	—
Water and sewer fund	37	21
Fleet management fund	47	—
Management information systems fund	57	98
Deferred revenue:		
Interest	—	48
Property taxes	24	75
Interest and penalties-property taxes	10	3
Tax liens	25	19
Federal government	181	85
Total liabilities	1,895	1,575
Fund balances:		
Reserved for encumbrances	320	211
Reserved for senior recreation program	145	—
Reserved for drug enforcement	75	—
Reserved for advances	78	50
Unreserved, undesignated	4,240	1,546
Total fund balances	4,858	1,807
Total liabilities and fund balances	6,753	3,382

The notes to the financial statements are an integral part of this statement.

**NAME OF GOVERNMENT
SPECIAL REVENUE FUNDS**

Combining Statement of Revenues, Expenditures and
Changes in Fund Balances

For the fiscal year ended December 31, 19x4

(With comparative totals for the fiscal year ended December 19x3)
(amounts expressed in thousands)

	Trans- portation	Parks Main- tenance	CDBG Revitali- zation	Totals	
				19x4	19x3
Revenues:					
Motor fuel tax:	729	—	—	729	355
Alcoholic beverage tax:	799	—	799	651	
Intergovernmental	100	—	338	438	28
Interest	77	39	—	116	70
Donations	—	149	—	149	239
Total revenue	906	987	338	2,231	1,343
Expenditures:					
Current:					
Highways and streets	742	—	—	742	—
Economic and physical Development	—	—	401	401	28
Culture and Recreation	—	1,001	—	1,001	605
Total expenditures	742	1,001	401	2,144	633
Excess (deficiency) of revenues over (under) expenditures	164	(14)	(63)	87	710
Other financing source:					
Operating transfer:					
General fund	—	—	63	63	5
Excess (deficiency) of revenues and other financing sources over (under) expenditures and other financing uses	164	(14)	—	150	71
Fund balances, January 1	744	480	5	1,229	514
Fund balances, December 31	908	466	5	1,379	1,229

The notes to the financial statements are an integral part of this statement.

SPECIAL REVENUE FUNDS

Special revenue funds are used to account for specific revenues that are legally restricted to expenditures for particular purposes.

Transportation Fund — This fund is used to account for the government's share of motor fuel tax revenues and special state grants that are legally restricted to the maintenance of state highways within the government's boundaries.

Parks Maintenance Fund — This fund is used to account for private donations and alcoholic beverage tax revenues (approved by voters in 19X3) that are specifically restricted to the maintenance of the government's parks.

CDBG Revitalization Project Fund — This fund is used to account for the community development block grant that is funding the revitalization project for substandard housing in the government's jurisdiction.

**NAME OF GOVERNMENT
SPECIAL REVENUE FUNDS**

Combining Balance Sheet
December 31, 19x4
(with comparative totals for December 31, 19x3)
(amounts expressed in thousands)

	Trans- portation	Parks Main- tenance	CDBG Revitali- zation	Totals	
				19x4	19x3
Assets					
Cash and cash equivalents	65	146	—	211	188
Investments	1,174	403	—	1,577	1,144
Interest receivable	1	1	—	2	12
Cash-restricted	—	—	4	4	—
Intergovernmental receivable restricted	—	—	19	19	5
Total assets	1,240	550	23	1,813	1,349
Liabilities and fund balances					
Liabilities:					
Accounts payable	332	84	—	416	82
Due to other funds-general fund ..	—	—	—	—	38
Liabilities payable from restricted assets	—	—	18	18	—
Total liabilities	332	84	18	434	120
Fund balances:					
Reserved for encumbrances	353	8	5	366	159
Unreserved, undesignated	555	458	—	1,013	1,070
Total fund balances	908	466	5	1,379	1,229
Total liabilities and fund balances	1,240	550	23	1,813	1,349

The notes to the financial statements are an integral part of this statement.

ENTERPRISE FUNDS

Enterprise Funds are used to account for operations that are financed and operated in a manner similar to private business enterprises — where the intent of the government's council is that the costs of providing goods or services to the general public on a continuing basis be financed or recovered primarily through user charges; or where the government's council has decided that periodic determination of net income is appropriate for accountability purposes.

Water and Sewer Authority Fund — This fund is used to account for the activities of the Water and Sewer Authority (a blended component unit of the NAME OF GOVERNMENT).

Electric Fund — This fund is used to account for the activities of the government's electric distribution operations.

NAME OF GOVERNMENT ENTERPRISE FUNDS

Combining Balance Sheet

December 31, 19X4

(With comparative totals for December 31, 19X3)

(amounts expressed in thousands)

	Water and Sewer Authority	Electric	Totals	
			19X4	19X3
ASSETS				
Current Assets:				
Cash and cash equivalents	\$ 1,366	\$ 4,253	\$ 5,619	\$ 4,121
Cash with fiscal agent	123	—	123	—
Investments	14,610	1,795	16,405	8,879
Interest receivable	409	51	460	435
Accounts receivable (net of allowance for uncollectibles)	2,621	1,378	3,999	3,551
Due from other funds:				
General fund	37	—	37	39
Fleet management fund	2	—	2	—
Inventories	308	637	945	930
Total current assets	19,476	8,114	27,590	17,955
Restricted assets:				
Customer deposits	1,543	188	1,731	1,375
Revenue bond operations and maintenance account	1,294	—	1,294	1,023
Revenue bond construction account	18,542	—	18,452	—
Revenue bond current debt service account	3,706	—	3,706	1,380
Revenue bond future debt service account	737	—	737	523
Revenue bond renewal and replacement account ...	1,632	—	1,632	1,165
Total restricted assets	27,454	188	27,642	5,466
Deferred charges	568	—	568	469
Fixed assets:				
Land	604	451	1,055	1,055
Buildings and system	20,928	7,043	27,971	19,817
Accumulated depreciation—buildings and system	(2,476)	(3,013)	(5,489)	(4,769)
Improvements other than buildings	1,250	—	1,250	1,250
Accumulated depreciation— improvements other than buildings	(342)	—	(342)	(188)
Machinery and equipment	104,283	1,094	105,377	104,761

	Water and Sewer Authority	Electric	Totals	
			19X4	19X3
Accumulated depreciation—				
machinery and equipment	(14,723)	(558)	(15,281)	(13,429)
Construction in progress	7,118	—	7,118	—
Fixed assets (net of accumulated depreciation)	116,642	5,017	121,659	108,407
Total assets	\$164,140	\$13,319	177,459	132,387
LIABILITIES AND EQUITY				
Current liabilities:				
Accounts payable	\$ 1,237	\$1,130	\$ 2,367	\$ 2,281
Compensated absences payable	374	16	390	378
Retainage payable	536	—	536	—
Due to other funds:				
General fund	65	—	65	193
Fleet management fund	17	—	17	—
Management info. sys. fund	5	—	5	14
Intergovernmental payable	—	—	—	11
Matured bonds payable	68	—	68	—
Matured interest payable	55	—	55	—
Accrued interest payable	1,045	—	1,045	1,100
General obligation bonds				
payable—current	1,480	—	1,480	1,360
Capital leases payable—current	23	—	23	—
Total current liabilities	4,905	1,146	6,051	5,337
Current liabilities payable from restricted assets:				
Customer deposits payable	1,543	188	1,731	1,375
Revenue bonds payable	1,484	—	1,484	530
Accrued interest payable	1,331	—	1,331	448
Total current liabilities payable				
from restricted assets	4,358	188	4,546	2,353
Noncurrents liabilities:				
General obligation bonds payable				
(net of unamortized discounts)	30,818	—	30,818	23,798
Revenue bonds payable (net of				
unamortized discounts)	31,975	—	31,975	8,580
Capital leases payable	78	—	78	—
Total noncurrent liabilities	62,871	—	62,871	32,378
Total liabilities	72,134	1,334	73,468	40,068

	Water and Sewer Authority	Electric	Totals	
			19X4	19X3
Equity:				
Contributed capital:				
Government	4,033	—	4,033	803
Customers	14,062	—	14,062	13,854
Developers	35,241	3,138	38,379	34,293
Intergovernmental	5,588	—	5,588	5,588
Total contributed capital	58,924	3,138	62,062	54,538
Retained earnings:				
Reserved for revenue bond operations and maintenance	1,294	—	1,294	1,023
Reserved for revenue bond current debt service	891	—	891	402
Reserved renewal and replacement	1,632	—	1,632	1,165
Unreserved	29,265	8,847	38,112	35,191
Total retained earnings	33,082	8,847	41,929	37,781
Total equity	92,006	11,985	103,991	92,319
Total liabilities and equity	\$164,140	\$13,319	\$177,459	\$132,387

The notes to the financial statements are an integral part of this statement.

NAME OF GOVERNMENT ENTERPRISE FUNDS

Combining Statement of Revenues, Expenses and Changes in Retained Earnings
for the fiscal year ended December 31, 19X4

(With comparative totals for the fiscal year ended December 31, 19X3)

(amounts expressed in thousands)

	Water and Sewer Authority	Electric	Totals	
			19X4	19X3
Operating revenues:				
Charges for sales and services:				
Water sales	\$ 9,227	—	\$ 9,227	\$ 7,588
Sewer charges	5,671	—	5,671	4,344
Tap fees	1,521	—	1,521	1,155
Electric sales	—	15,250	15,250	15,110
Total operating revenues	16,419	15,250	31,669	28,197
Operating expenses:				
Costs of sales and services	6,997	10,772	17,769	16,879
Administration	3,137	1,482	4,620	4,342
Depreciation	2,436	318	2,754	2,597
Total operating expenses	12,570	12,573	25,143	23,818
Operating income	3,849	2,677	6,526	4,379
Nonoperating revenues (expenses):				
Intergovernmental	350	46	396	172
Interest revenue	1,753	523	2,276	2,357
Interest expense	(3,439)	—	(3,439)	(2,765)
Bond issuance costs	(25)	—	(25)	(10)
Loss on sales of fixed assets	(10)	—	(10)	—
Total nonoperating revenues (expenses)	(1,371)	569	(802)	(246)
Income before operating transfers	2,478	3,246	5,724	4,133
Transfer (to) other funds:				
General fund	—	(1,576)	(1,576)	—
Net income	2,478	1,670	4,148	4,133
Retained earnings, January 1	30,604	7,177	37,781	33,648
Retained earnings December 31	\$33,082	\$ 8,847	\$41,929	\$37,781

The notes to the financial statements are an integral part of this statement.

**NAME OF GOVERNMENT
ENTERPRISE FUNDS**

Combining Statement of Cash Flows
For fiscal year ended December 31, 19X4
(With comparative totals for fiscal year ended December 31, 19X3)
(amounts expressed in thousands)

	Water and Sewer Authority	Electric	Totals	
			19X4	19X3
Cash flows from operating activities:				
Cash received from customers	\$16,151	\$15,097	\$31,248	\$27,364
Cash paid to suppliers	(5,813)	(10,558)	(16,371)	(16,064)
Cash paid for quasi-external transactions	(1,202)	—	(1,202)	—
Cash paid to employees	(3,117)	(1,903)	(5,020)	(4,338)
Net cash provided by operating activities	6,019	2,636	8,655	6,962
Cash flows from noncapital financing activities:				
Transfer to general fund	—	(1,576)	(1,576)	—
Subsidy from federal grant	350	46	396	172
Net cash provided (used) by noncapital financing activities	350	(1,530)	(1,180)	172
Cash flows from capital and related financing activities:				
Proceeds from general obligation bonds	8,423	—	8,423	—
Proceeds from revenue bonds	34,150	—	34,150	—
Principal payments—bonds	(11,170)	—	(11,170)	(1,885)
Principal payments—capital leases	(12)	—	(12)	—
Interest paid	(2,310)	—	(2,310)	(2,887)
Proceeds from sales of fixed assets	5	—	5	—
Purchase of fixed assets	—	(494)	(494)	(1,637)
Capital lease obligation down payments	(6)	—	(6)	—
Construction (including capitalized interest costs)	(11,396)	—	(11,396)	—
Contributed capital	4,294	—	4,294	6,744
Net cash provided (used) by capital and related financing activities	21,978	(494)	21,484	335
Cash flows from investing activities:				
Proceeds from sale of investments	1,568	2,038	3,606	2,987
Purchase of investments	(23,860)	(2,276)	(26,136)	(9,896)
Interest received	1,347	593	1,940	2,316
Net cash provided (used) by investing activities	(20,945)	355	(20,590)	(4,593)

	Water and Sewer Authority	Electric	Totals	
			19X4	19X3
Net increase (decrease) in cash and cash equivalents	7,402	967	8,369	2,876
Cash and cash equivalents, January 1 (including \$8,611 in restricted accounts)	2,698	3,474	6,172	3,296
Cash and cash equivalents, December 31 (including \$188 in restricted accounts)	\$10,100	\$ 4,441	\$14,541	\$ 6,172

RECONCILIATION OF OPERATING INCOME TO NET CASH PROVIDED BY OPERATING ACTIVITIES

	Water and Sewer Authority	Electric	Totals	
			19X4	19X3
Operating income	\$ 3,849	\$ 2,677	\$ 6,526	\$ 4,379
Adjustments to reconcile operating income to net cash provided by operating activities:				
Depreciation expense	2,436	318	2,754	2,597
(Increase) in accounts receivable	(508)	(153)	(661)	(40)
Increase in due from other funds	—	—	—	(11)
(Increase) in allowance for uncollectible accounts	213	—	213	110
(Increase) decrease in inventories	153	(168)	(15)	(100)
Increase in customer deposits	233	12	245	84
Increase (decrease) in accounts payable	133	(47)	86	(34)
(Increase) in amounts payable related to equipment purchase	(374)	—	(374)	—
Increase (decrease) in compensated absences payable	15	(3)	12	(2)
Increase (decrease) in inter-governmental payables	(11)	—	(11)	4
Increase (decrease) in due to other funds	(120)	—	(120)	5
Total adjustments	2,170	(41)	2,129	2,583
Net cash provided by operating activities	\$ 6,019	\$ 2,636	\$ 8,655	\$ 6,962

Noncash Investing, Capital and financing Activities

Borrowing under capital lease	101	—
Contributions of fixed assets from government	3,230	—
Purchase of equipment on account	374	—

The notes to the financial statements are an integral part of this statement.

TRUST AND AGENCY FUNDS

Trust funds are used to account for assets held by the government in a trustee capacity. Agency funds are used to account for assets held by the government as an agent for individuals, private organizations, other governments and/or other funds.

Senior Citizens' Transportation Fund — This fund is used to account for donations that are received pursuant to a trust agreement that restricts the use of those donations to providing subsidies for senior citizens' transportation to special government sponsored events.

Perpetual Care Fund — This fund is used to account for principal trust amounts received and related interest income. The interest portion of the trust can be used to maintain the community cemetery.

Public Safety Employees Retirements System Fund — This fund is used to account for the accumulation of resources for pension benefit payments to qualified public safety employees.

Deferred Compensation Fund — This fund is used to account for assets held for employees in accordance with the provisions of Internal Revenue Code Section 457.

NAME OF GOVERNMENT TRUST AND AGENCY FUNDS

Combining Balance Sheet
December 31, 19X4
(With comparative totals for December 31, 19X3)
(amounts expressed in thousands)

	Expendable Trust	Non- Expendable Trust	Pension Trust	Agency	Totals	
	Senior Citizens' Transportation	Perpetual Care	Public Safety Employees	Deferred Compensation	19X4	19X3
Assets						
Cash and cash equivalents ..	\$ 11	\$ 231	\$ 33	\$ 18	\$ 293	\$ 87
Investments	41	1,752	14,335	1,198	17,327	15,394
Interest receivable	6	82	346	—	434	163
Total assets	\$ 58	\$ 2,066	\$ 14,714	\$ 1,216	\$ 18,054	\$ 15,644
Liabilities and fund balances						
Liabilities:						
Accounts payable	\$ 7	\$ 13	\$ 18	—	\$ 38	\$ 36
Deferred compensation benefits payable	—	—	—	1,216	1,216	900
Total liabilities	7	13	18	1,216	1,254	936
Fund balances:						
Reserved for perpetual care	—	1,102	—	—	1,102	1,102
Reserved for employees retirement system	—	—	16,802	—	16,802	14,248
Unreserved, undesignated	51	951	(2,106)	—	(1,104)	(642)
Total fund balances	51	2,053	14,696	—	16,800	14,708
Total liabilities and fund balances	\$ 58	\$ 2,066	\$ 14,714	\$ 1,216	\$ 18,054	\$ 15,644

The notes to the financial statements are an integral part of this statement.

**NAME OF GOVERNMENT
SENIOR CITIZENS' TRANSPORTATION
EXPENDABLE TRUST FUND**

Comparative Balance sheets
December 31, 19X4 and 19X3
(amounts expressed in thousands)

	19X4	19X3
Assets		
Cash and cash equivalents	\$ 11	\$ 16
Investments	41	33
Interest receivable	6	2
Total assets	\$ 58	\$ 51
Liabilities and fund balances		
Liabilities:		
Accounts payable	\$ 7	\$ 2
Fund balances:		
Unreserved, undesignated	51	49
Total liabilities and fund balances	\$ 58	\$ 51

The notes to the financial statements are an integral part of this statement.

**NAME OF GOVERNMENT
SENIOR CITIZENS' TRANSPORTATION
EXPENDABLE TRUST FUND**

Comparative Statements of Revenues, Expenditures
and Changes in Fund Balances for fiscal years ended
December 31, 19X4 and 19X3
(amounts expressed in thousands)

	19X4	19X3
Revenues:		
Interest	\$ 6	\$ 2
Donations	82	52
Total revenues	88	54
Expenditures:		
Current:		
General government	86	29
Excess of revenues over expenditures	2	25
Fund balances, January 1	49	24
Fund balances, December 31	\$ 51	\$ 49

The notes to the financial statements are an integral part of this statement.

APPENDIX B

Excerpted from New York State
Operating Permit Program, Annual Report 1996 (pp. 6-13).

NEW YORK STATE OPERATING PERMIT PROGRAM 1995 ANNUAL REPORT

Contents	Page
Introduction.....	1
Preface	1
Background	2
New York State's Operating Permit Program Status.....	3
New York State's Operating Permit Program Implementation	4
Fiscal Report.....	6
Operating Permit Program Fee.....	6
Clean Air Compliance Act Reporting Requirements	7
Recommended Fee Adjustment	8
Program Report.....	12
State Fiscal Year 94/95 Details and Projections	12
Other Involved Agencies	13
 Appendices	
Appendix A: NYS Department of Economic Development-Clean Air Act Small Business Ombudsman, Annual Report to the NYS DEC-August 1995	
Appendix B: NYS Department of Health-Clean Air Compliance Activities-November 1995	
Appendix C: NYS Environmental Facilities Corporation-Small Business Assistance Program Annual Report to DEC-August 1995	
 Figures	
Figure 1: 1994/95 Operating Permit actual Costs	9
Figure 2: 1995/96 Operating Permit Estimated Costs	10
Figure 3: 1996/97 Operating Permit Estimated Costs	11
Figure 4: Projected Number of Permits Subject to Review for Title V OPP Implementation	12

FISCAL REPORT

Operating Permit Program Fee

Beginning in 1994, Title V facilities were required to pay the tonnage based OPP fee, pursuant to section 72-0303 of the ECL. OPP fees collected are deposited in the OPP Account of the Clean Air Fund established by State Finance Law. Non-Title V sources continue to pay Air Quality Control Program fees that are deposited to the Environmental Regulatory Account established in 1983.

Both the federal Act and the NYSCACA require fee revenues sufficient to cover all reasonable direct and indirect costs required to develop, administer and enforce the State's Title V permit program. Once EPA approves the State's plan for delegation of the Title V program to the State, Title V/OPP fees can only be used to fund Title V permit program activities. Prior to approval, Title V activities can be funded from any sources available to the State. For fiscal years 1994/95 and 1995/96, the DEC's Title V workload has been funded from the General Fund, the Utility Regulatory Account, Federal Funds and the OPP Account.

In 1994/95, Title V activities constituted 35% of the DEC's air program effort, however the OPP Account only paid for 26% of DEC's air program costs. It is anticipated that as newly authorized positions funded from the OPP Account are filled during 1995/96, the amount expended from the OPP Account will approach 100% of the Title V program cost. Many of the employees who will be recruited to the new OPP jobs will be transferring from existing positions currently funded by the Section 105 federal grant. Section 105 funds may not be used for Title V costs once federal approval of the OPP is obtained. Those grant funds are expected to be reduced accordingly by the federal government.

The State legislation requires that commencing January 1, 1994 and annually thereafter, the Department use a formula to calculate the fee per ton of emissions that subject sources are required to pay and that the calculation and fee be established as a rule through publication in the Environmental Notice Bulletin. The fee is calculated by dividing the current State fiscal year appropriation for the OPP by the total tons of emissions of regulated air contaminants from sources subject to the OPP during the prior calendar year, with consideration given to any surplus or deficit in the OPP Account of the Clean Air Fund, any loan repayment from the Mobile Source Account of the Clean Air Fund and the rate of collection of bills issued for the fee. The fee is limited to a maximum fee of \$25 per ton, increased by the percentage, if any, by which the Consumer Price Index (CPI) exceeds the CPI for the prior year. Based upon this ceiling, the 1994 fee was \$25.69 and the 1995 fee was \$26.44.

Clean Air Compliance Act Reporting Requirements

The NYSCACA specifies the fiscal information that this report must contain. These are as follows; the actual direct and indirect costs and revenues received in State fiscal year (SFY) 1994/95; SFY 1995/96 estimates for direct and indirect costs, revenues and the year end balance of the Clean Air Fund's OPP Account; SFY 1996/97 projections for direct and indirect costs and tonnage of pollutants that will be subject to OPP fees; and finally, a recommendation on an adjustment to the fees to assure adequate funding during future fiscal years. Each of these requirements is addressed under subheadings below.

Cost figures provided in this report are actual or projected expenditures between April 1 and March 31 for a given State fiscal year. Expenditure figures rather than appropriations are used in this report since expenditures provide more accurate reflection of actual program costs. Appropriations only reflect the level of spending the Legislature has authorized in a particular year, and authorized funds may not be disbursed in that year. A legislative appropriation is usually based on anticipated revenues. If actual revenues generated by the OPP fees are less than the appropriation, the full appropriation cannot be spent. Expenditures may be made against a prior year's appropriations, current year appropriations or a reappropriation depending on when the liability was incurred.

State Fiscal Year 1994/95

The actual direct and indirect costs of the OPP in SFY 1994/95 were \$10,687,799. This amount includes expenditures by the Departments of Environmental Conservation, Health, Economic Development, and the Environmental Facilities Corporation. A detailed summary is included in Figure 1. The sources of funds for the program were OPP Account \$7,413,029 with the balance coming from the General Fund, Federal Funds, and the Utility Regulatory Account. Total revenues received by the OPP account during SFY 1994-95 were \$11,084,735. Revenues included fees, interest and penalties.

State Fiscal Year 1995/96

The estimated direct and indirect costs of the OPP in SFY 1995/96 are \$13,653,881. This amount reflects expenditures by the Departments of Environmental Conservation, Health, Economic Development, and the Environmental Facilities Corporation. A detailed summary is included in Figure 2.

Revenues anticipated to be received in SFY 1995-96 total \$10,427,629. This amount is based on emission tonnage billing of 453,320 tons times a per ton fee of \$26.44 minus a 13% uncollectible figure. This revenue estimate does not in-

clude any additional funds that may be collected from prior year fees, penalties and interest.

DEC estimates that the balance in the OPP Account at the end of SFY 1995/96 will be \$4,564,498. This estimate is based on:

Beginning balance	\$7,711,618
Anticipated revenues	\$10,427,629
Projected expenditures	\$13,653,881
Ending balance	\$4,485,366

State Fiscal Year 1996/97

The estimated direct and indirect costs of the OPP in SFY 1996/97 are \$14,590,658. This amount reflects projected expenditures by the Departments of Environmental Conservation, Health, Economic Development and the Environmental Facilities Corporation. A detailed summary is included in Figure 3.

Under current legislation, revenues estimated to be received in SFY 1996/97 total \$10,522,530. This amount is based on an emission tonnage billing of 430,000 tons times a per ton fee of \$27.19 minus a 10% uncollectible figure. The fee of \$27.19 is the maximum allowed by the ceiling currently prescribed in the NYSCACA.

Recommended Fee Adjustment

The 1996/97 appropriations requested by DEC for the OPP represent no further enhancement. Rather, the request is merely for the full annual value of the program levels authorized on a part-year basis by the 1993/94 and 1994/95 budgets. DEC is making no recommendation for an adjustment at this time.

FIGURE 1:
1994-1995 OPERATING PERMIT ACTUAL COSTS

Category	Personal Service	Fringe Benefits	Nonpersonal Service	Capital	Total
Direct Program Costs					
Environmental Conservation	4,234,341	1,253,520	985,050	343,708	6,816,619
Health	448,686	137,836	116,543	0	703,065
Economic Development	222,649	68,398	441,716	0	732,763
Environmental Facilities Corp.	0	0	556,853	0	556,853
Total Direct Costs	4,905,676	1,459,754	2,100,162	343,708	8,809,300
Indirect Program Costs					
Environmental Conservation					1,716,141
Health					150,736
Economic Development					111,622
Environmental Facilities Corp.					0
Total indirect costs					1,878,499
Total Operating Permit Program Costs					10,687,799

ASSUMPTIONS:

DEPARTMENT OF ENVIRONMENTAL CONSERVATION:

Direct costs were based on Time and Activity records including adjustments made by supervisory staff. It was determined that 35% of Air staff time was devoted to Operating Permit Program activities in SFY 1994-95. This percentage was applied to the total Air expenditure in SFY 1994-95. Indirect costs were calculated at 31.8% of personal service and fringe benefit costs and reflect costs associated with agency operations, auxiliary support staff and other state overhead responsibilities.

Departments of Health and Economic Development: Reports containing expenditure information were provided to DEC by these agencies.

**FIGURE 2:
1995-96 OPERATING PERMIT ESTIMATED COSTS**

Category	Personal Service	Fringe Benefits	Subtotal	Nonpersonal Service	Capital	Total
Direct Program Costs						
Environmental						
Conservation	4,476,601	1,399,833	5,876,434	1,879,788	1,500,000	9,256,222
Health	249,579	78,043	327,622	15,312	0	243,934
Economic						
Development	403,345	126,126	529,471	613,731	0	1,143,202
Environmental						
Facilities Corp.	0	0	0	1,040,614	0	1,040,614
Total Direct Costs	5,129,525	1,604,002	6,733,527	3,549,445	1,500,000	11,782,972
Indirect Program Costs						
Environmental Conservation				1,754,116	0	1,754,116
Health				97,795	0	97,795
Economic Development				18,998	0	18,998
Environmental Facilities Corp				0	0	0
Total Indirect Costs				1,870,909	0	1,870,909
Total Operating Costs ..	5,129,525	1,604,002	6,733,527	5,420,354	1,500,000	13,653,881

ASSUMPTIONS:

Environmental Conservation:

Personal Service expenditures reflect actual carry-in from 1994-95 plus 12 month projected expenditures for 66 positions carried over from 1994-95 and 3 month projected expenditures for 42 direct positions to be filled during the current fiscal year.

Funding for 11 positions from SFY 1994-95 and 8 positions from SFY 1995-96 that are assigned to the Division of Regulatory Services and other support offices is shown under the Indirect Program costs heading.

Nonpersonal service expenditures reflect actual carry-in from 1994-95 projected 12 month disbursements against 1995-96 appropriations (88% of planned in 12 month period).

Capital expenditures assume 100% of planned amount.

Environmental Facilities Corporation

Nonpersonal service expenditures reflect actual carry-in from 1994-95 plus projected 12 month disbursements against 1995-96 appropriations. (88% of planned in 12 month period).

Fringe Benefits/Indirect:

Fringe benefits for all agencies are calculated at 31.27% of personal service

Indirect costs for Environmental Conservation and Health are calculated at 29.85% of personal service and fringe benefits.

Indirect costs for Economic development are 4.71% of personal service.

**FIGURE 3:
1996-97 OPERATING PERMIT ESTIMATED COSTS**

Category	Personal Service	Fringe Benefits	Subtotal	Nonpersonal Service	Capital	Total
Direct Program Costs						
Environmental						
Conservation	5,210,708	1,629,388	6,840,096	1,929,032	1,000,000	9,809,128
Health	249,579	78,043	327,622	75,312	0	402,934
Economic						
Development	399,366	124,882	524,248	558,296	0	1,082,544
Environmental						
Facilities Corp.	0	0	0	1,000,000	0	1,000,000
Total Direct Costs	5,859,653	1,832,313	7,691,966	3,602,640	1,000,000	12,294,606
Indirect Program Costs						
Environmental Conservation				2,041,769	0	2,041,769
Health				97,795	0	97,769
Economic Development				156,488	0	156,488
Environmental Facilities Corp				0	0	0
Total Indirect Costs				2,296,052	0	2,296,052
Total Operating Costs ...	5,859,653	1,832,313	7,691,966	5,898,692	1,000,000	14,590,658

ASSUMPTIONS:

Planned expenditures for all agencies reflect projected carry-in amounts against 1995-96 appropriations plus 99% of requested personal service and 88% of non-personal service appropriations.

Capital expenditures are estimated at 1,000,000.

FRINGE BENEFITS/INDIRECT:

Fringe benefits for all agencies are calculated at 31.27% of personal service.

Indirect costs for all agencies are calculated at 29.85% of personal service and fringe benefits.

STATE FISCAL YEAR 1994/95

DETAILS AND PROJECTIONS

The NYSCACA requires DEC to report the number of Operating Permit applications on which final action was taken in the previous fiscal year with details on average review time per permit, number of person hours spent per permit and the number of complete permit applications filed. Since the State did not have a federally approved OPP in effect in SFY 1994/95, no Title V permits were reviewed or issued and actual data on average review time per permit is not available. However, the Department has projected, to the extent possible, the minimum number of permit reviews that will be necessary to implement the program over the next five years. These are reflected in Figure 4.

FIGURE 4:
PROJECTED NUMBER OF PERMITS
SUBJECT TO REVIEW IN ORDER TO IMPLEMENT TITLE V

Permit Type	Permits to be reviewed over the next 5 years	Average Review Time* (days/permit)
Existing major facilities	876	40
Nox and VOC Reasonable Achievable Technological Cont. (RACT) permit modifications	200	15
Title V General Permits	150	10
New source review (Title I) includes PSD reviews, netting/trading permit modifications	100	80
Known MACT (Section 112) sources	150**	30
Capping out of Title V and RACT	9650***	1

* This time represents estimated technical review time by Division of Air staff only. Specific permit applications could take considerably more or less time depending on the size and complexity of the facility. Also the review time does not include that required by Division of Regulatory Affairs to process and issue permits.

** The numbers in the table are estimates of the effort required to review permits for six categories of sources for which MACT standards have been adopted by EPA. There are 174 categories for which MACT standards are ultimately required to be developed. As new MACT standards are promulgated there will be a significant increase in both the number of facilities that require permits and the effort necessary to review those permits.

*** This includes the approximately 6000 New York City sources that will need modifications to their permits in order to cap out of Title V.

OTHER INVOLVED AGENCIES

The NYSCACA does not specifically require that the activities of other involved agencies be reported. However, the Department of Health, Department of Economic Development and the Environmental Facilities Corporation were asked to report so that the direct costs of the fiscal portion of this report could be determined. Expenditures reported by those agencies have been included in this report. Their submissions to DEC are included as appendices to this report.

The Environmental Finance Center is part of the Coastal and Environmental Policy Program (CEPP) and is hosted by the Maryland Sea Grant College.

About CEPP

The Coastal and Environmental Policy Program is a non-degree granting program composed of the University of Maryland Sea Grant Program, the School of Public Affairs, the College of Agriculture, the School of Law, and the Center For Environmental and Estuarine Studies. CEPP provides informational, educational and research policy analysis and technical problem-solving assistance.

About Sea Grant

The National Sea Grant Program encourages wise stewardship of our marine resources through research, education, outreach and technology transfer. Maryland Sea Grant is one of twenty-nine Sea Grant programs across the country — part of a national partnership supported jointly by state and federal funds, from the National Oceanic and Atmospheric Administration.

About the EFC

With support from the U.S. Environmental Protection Agency (EPA) and the Maryland Sea Grant College Program, the Environmental Finance Center (EFC) was created to train, provide assistance and act in an advisory capacity to state and local governments on issues related to environmental finance.

The Center promotes a comprehensive and integrative look at environmental finance from a strategic management perspective that suggests that sound environmental practices encompass a broad spectrum of activities. Activities such as needs assessments, issue prioritization, identification of relevant environmental regulations and compliance issues, development of capital facilities plans, identification of revenue sources, and community participation are precursors to securing funding that form part of the EFC's holistic approach.

To find out more about the Environmental Finance Center visit our web page: <http://www.mdsg.umd.edu/MDSG/EFC/index.html>

TITLE V OF THE CLEAN AIR ACT

One of the most important benefits of the new Title V operating permits program of the Clean Air Act is that the program itself will ensure that adequate resources are available for its administration. By collecting fees from stationary air pollution sources in exchange for permits which regulate levels of emissions, states and localities can achieve a number of desired goals:

- Use revenues generated by those regulated to monitor, enforce, and report on stationary air emissions
- Create incentives for those sources to reduce emissions by forcing permit holders to internalize the costs of emitting air pollutants
- Begin to track air pollution control requirements and performance so it becomes easier to manage programs across media, such as air, water, and land

If revenues generated from a program go to support other state efforts, then not only will the program suffer from lack of resources, but those paying the permit fees will not receive the level of service that they are paying for.

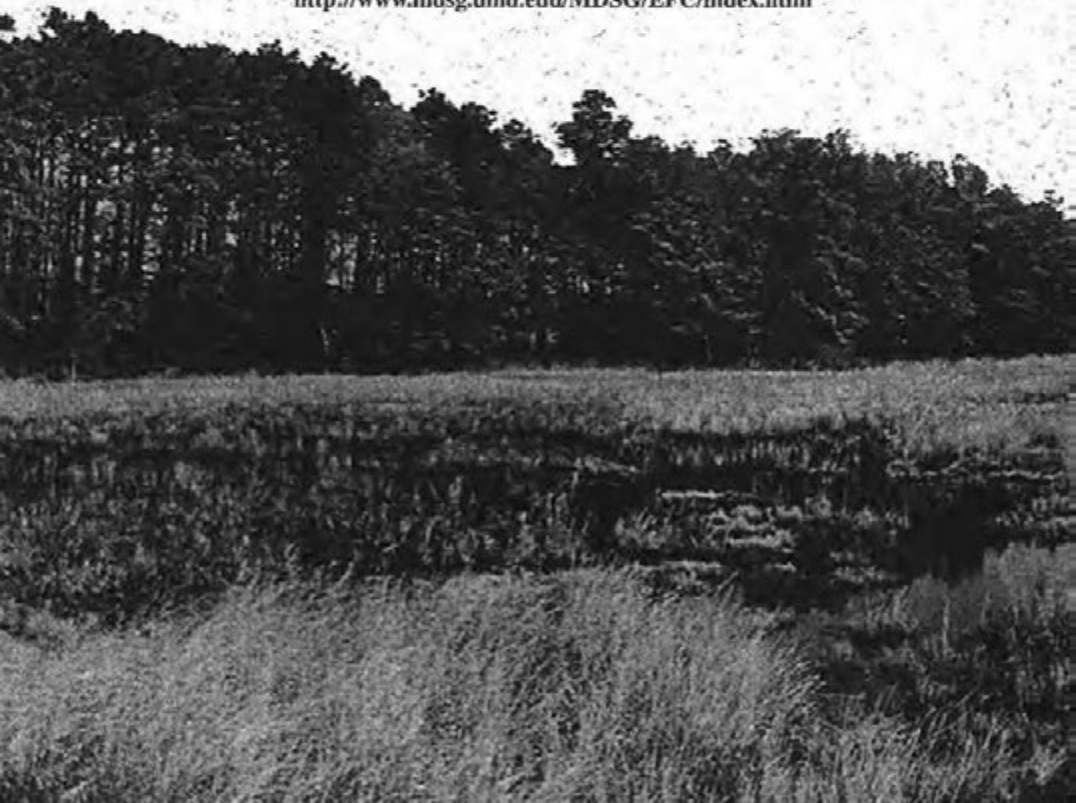
This handbook identifies ways a state or local air program agency can collect, segregate, and account for Title V fees so that they are not commingled with other efforts.



ISSUES IN ENVIRONMENTAL FINANCE



Environmental Finance Center ■ University of Maryland System
<http://www.mdsg.umd.edu/MDSG/EFC/index.html>



Appendix F. SDAPCD Fee Information

Title V Revenue	
Fiscal Year	Revenue
FY1819	\$40,658
FY1920	\$23,692
FY2021	\$86,154

SITE_RECORD_ID	TITLE_V_PROGRAM	APP_RECORD_ID	OPEN_DATE	RECORD_STATUS	FACILITY	INVOICE_NBR	TRANSACTION_DATE	TRANSACTION_AMOUNT	FEE_SCHEDULE	FEE_ITEM_CODE	FEE_DESCRIPTION
APCD1976-SITE-00145	Yes	APCD2018-APP-005393	04/30/2018	Open	General Dynamics NASSCO	3298915	12/09/2020	\$20.70	APCD_94	APCD_94D	Senior Engineer
APCD1976-SITE-00145	Yes	APCD2019-APP-005991	08/29/2019	Open	General Dynamics NASSCO	3282028	11/12/2020	\$342.00	APCD_94	APCD_94C	Associate Engineer
APCD1976-SITE-00145	Yes	APCD2019-APP-005991	08/29/2019	Open	General Dynamics NASSCO	3282026	11/12/2020	\$171.00	APCD_94	APCD_94C	Associate Engineer
APCD1976-SITE-00145	Yes	APCD2019-APP-005991	08/29/2019	Open	General Dynamics NASSCO	3292236	11/24/2020	\$171.00	APCD_94	APCD_94C	Associate Engineer
APCD1976-SITE-00145	Yes	APCD2019-APP-005991	08/29/2019	Open	General Dynamics NASSCO	3293581	11/30/2020	\$85.50	APCD_94	APCD_94C	Associate Engineer
APCD1976-SITE-00145	Yes	APCD2019-APP-005991	08/29/2019	Open	General Dynamics NASSCO	3294826	12/02/2020	\$239.40	APCD_94	APCD_94C	Associate Engineer
APCD1976-SITE-00145	Yes	APCD2019-APP-005991	08/29/2019	Open	General Dynamics NASSCO	3298913	12/09/2020	\$20.70	APCD_94	APCD_94D	Senior Engineer
APCD1976-SITE-00145	Yes	APCD2020-APP-006212	02/24/2020	Open	General Dynamics NASSCO	3350687	03/02/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer
APCD1976-SITE-00145	Yes	APCD2020-APP-006308	06/01/2020	Open	General Dynamics NASSCO	3298910	12/09/2020	\$82.80	APCD_94	APCD_94D	Senior Engineer
APCD1976-SITE-00145	Yes	APCD2020-APP-006308	06/01/2020	Open	General Dynamics NASSCO	3307198	12/16/2020	\$427.50	APCD_94	APCD_94C	Associate Engineer
APCD1976-SITE-00145	Yes	APCD2020-APP-006308	06/01/2020	Open	General Dynamics NASSCO	3308694	12/21/2020	\$171.00	APCD_94	APCD_94C	Associate Engineer
APCD1976-SITE-00145	Yes	APCD2020-APP-006308	06/01/2020	Open	General Dynamics NASSCO	3309252	12/22/2020	\$855.00	APCD_94	APCD_94C	Associate Engineer
APCD1976-SITE-00145	Yes	APCD2020-APP-006308	06/01/2020	Open	General Dynamics NASSCO	3309313	12/23/2020	\$256.50	APCD_94	APCD_94C	Associate Engineer
APCD1976-SITE-00145	Yes	APCD2020-APP-006308	06/01/2020	Open	General Dynamics NASSCO	3309315	12/23/2020	\$855.00	APCD_94	APCD_94C	Associate Engineer
APCD1976-SITE-00145	Yes	APCD2020-APP-006308	06/01/2020	Open	General Dynamics NASSCO	3311039	12/29/2020	\$1,008.90	APCD_94	APCD_94C	Associate Engineer
APCD1976-SITE-00145	Yes	APCD2020-APP-006308	06/01/2020	Open	General Dynamics NASSCO	3311078	12/29/2020	\$615.60	APCD_94	APCD_94C	Associate Engineer
APCD1976-SITE-00145	Yes	APCD2020-APP-006308	06/01/2020	Open	General Dynamics NASSCO	3312178	01/04/2021	\$752.40	APCD_94	APCD_94C	Associate Engineer
APCD1976-SITE-00145	Yes	APCD2020-APP-006308	06/01/2020	Open	General Dynamics NASSCO	3312179	01/04/2021	\$239.40	APCD_94	APCD_94C	Associate Engineer
APCD1976-SITE-00145	Yes	APCD2020-APP-006308	06/01/2020	Open	General Dynamics NASSCO	3311919	01/04/2021	\$820.80	APCD_94	APCD_94C	Associate Engineer
APCD1976-SITE-00145	Yes	APCD2020-APP-006308	06/01/2020	Open	General Dynamics NASSCO	3312724	01/05/2021	\$564.30	APCD_94	APCD_94C	Associate Engineer
APCD1976-SITE-00145	Yes	APCD2020-APP-006308	06/01/2020	Open	General Dynamics NASSCO	3313164	01/06/2021	\$598.50	APCD_94	APCD_94C	Associate Engineer
APCD1976-SITE-00145	Yes	APCD2020-APP-006308	06/01/2020	Open	General Dynamics NASSCO	3313663	01/07/2021	\$684.00	APCD_94	APCD_94C	Associate Engineer
APCD1976-SITE-00145	Yes	APCD2020-APP-006308	06/01/2020	Open	General Dynamics NASSCO	3323360	01/19/2021	\$222.30	APCD_94	APCD_94C	Associate Engineer
APCD1976-SITE-00145	Yes	APCD2020-APP-006308	06/01/2020	Open	General Dynamics NASSCO	3323420	01/20/2021	\$85.50	APCD_94	APCD_94C	Associate Engineer
APCD1976-SITE-00145	Yes	APCD2020-APP-006308	06/01/2020	Open	General Dynamics NASSCO	3328974	01/28/2021	\$510.00	APCD_94	APCD_94B	Assistant Engineer
APCD1976-SITE-00145	Yes	APCD2020-APP-006308	06/01/2020	Open	General Dynamics NASSCO	3335972	02/09/2021	\$85.00	APCD_94	APCD_94B	Assistant Engineer
APCD1976-SITE-00145	Yes	APCD2021-APP-006729	04/19/2021	Open	General Dynamics NASSCO	3426368	06/07/2021	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1976-SITE-00145	Yes	APCD2021-APP-006729	04/19/2021	Open	General Dynamics NASSCO	3435442	06/17/2021	\$20.70	APCD_94	APCD_94D	Senior Engineer
APCD1976-SITE-01130	Yes	APCD2020-APP-006524	11/12/2020	Open	Solar Turbines Incorporated	3282927	11/16/2020	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1976-SITE-02083	Yes	APCD2019-APP-006051	10/11/2019	Open	City of San Diego - PUD Point Loma Water Treatment Plant	3437281	06/21/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer
APCD1976-SITE-02083	Yes	APCD2020-APP-006323	06/09/2020	Open	City of San Diego-Metropolitan Wastewater Dept	3435469	06/17/2021	\$20.70	APCD_94	APCD_94D	Senior Engineer
APCD1976-SITE-02083	Yes	APCD2020-APP-006484	10/13/2020	Open	City of San Diego-Metropolitan Wastewater Dept	3258451	10/15/2020	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1976-SITE-02083	Yes	APCD2020-APP-006484	10/13/2020	Open	City of San Diego-Metropolitan Wastewater Dept	3435463	06/17/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer
APCD1978-SITE-02756	Yes	APCD2017-APP-005185	10/24/2017	Open	Fleet Readiness Center Southwest	3437359	06/21/2021	\$20.70	APCD_94	APCD_94D	Senior Engineer
APCD1978-SITE-02756	Yes	APCD2020-APP-006230	03/16/2020	Open	Fleet Readiness Center Southwest	3294077	12/01/2020	\$513.00	APCD_94	APCD_94C	Associate Engineer
APCD1978-SITE-02756	Yes	APCD2020-APP-006230	03/16/2020	Open	Fleet Readiness Center Southwest	3297949	12/07/2020	\$85.50	APCD_94	APCD_94C	Associate Engineer
APCD1978-SITE-02756	Yes	APCD2020-APP-006385	07/23/2020	Open	Fleet Readiness Center Southwest	3336531	02/10/2021	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1978-SITE-02756	Yes	APCD2020-APP-006385	07/23/2020	Open	Fleet Readiness Center Southwest	3435464	06/17/2021	\$20.70	APCD_94	APCD_94D	Senior Engineer
APCD1979-SITE-00623	Yes	APCD2019-APP-005961	08/07/2019	Open	SFPF, LP	3350650	03/02/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer
APCD1979-SITE-00623	Yes	APCD2019-APP-005961	08/07/2019	Open	SFPF, LP	3437310	06/21/2021	\$20.70	APCD_94	APCD_94D	Senior Engineer
APCD1979-SITE-00623	Yes	APCD2020-APP-006542	11/30/2020	Open	SFPF, LP	3295426	12/03/2020	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1979-SITE-00623	Yes	APCD2020-APP-006542	11/30/2020	Open	SFPF, LP	3435459	06/17/2021	\$20.70	APCD_94	APCD_94D	Senior Engineer
APCD1979-SITE-00623	Yes	APCD2021-APP-006689	03/24/2021	Open	SFPF, LP	3367612	03/24/2021	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1979-SITE-00623	Yes	APCD2021-APP-006689	03/24/2021	Open	SFPF, LP	3435444	06/17/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer
APCD1979-SITE-00623	Yes	APCD2021-APP-006741	04/30/2021	Open	SFPF LP	3394653	05/03/2021	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1979-SITE-00623	Yes	APCD2021-APP-006741	04/30/2021	Open	SFPF LP	3395800	05/05/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer
APCD1979-SITE-00623	Yes	APCD2021-APP-006742	04/30/2021	Open	SFPF LP	3394667	05/03/2021	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1980-SITE-02754	Yes	APCD2019-APP-005964	08/09/2019	Open	USN Air Station NORIS	3350652	03/02/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer
APCD1980-SITE-02754	Yes	APCD2019-APP-005964	08/09/2019	Open	USN Air Station NORIS	3437308	06/21/2021	\$20.70	APCD_94	APCD_94D	Senior Engineer
APCD1980-SITE-02754	Yes	APCD2020-APP-006196	02/07/2020	Open	USN Air Station NORIS	3350502	03/02/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer
APCD1980-SITE-02754	Yes	APCD2020-APP-006196	02/07/2020	Open	USN Air Station NORIS	3437278	06/21/2021	\$20.70	APCD_94	APCD_94D	Senior Engineer
APCD1980-SITE-02754	Yes	APCD2020-APP-006345	10/29/2020	Open	USN Air Station NORIS	3273322	11/02/2020	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1980-SITE-02754	Yes	APCD2020-APP-006345	10/29/2020	Open	USN Air Station NORIS	3435466	06/17/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer
APCD1982-SITE-00195	Yes	APCD2018-APP-005404	05/17/2018	Cancelled	Cabrillo Power I LLC	2702934	01/28/2021	\$174.87	APCD_MISC	APCD_LGL_NOT	Reimbursement of cost of Legal Notices
APCD1982-SITE-00195	Yes	APCD2018-APP-005404	05/17/2018	Cancelled	Cabrillo Power I LLC	2702934	01/28/2021	\$389.40	APCD_MISC	APCD_LGL_NOT	Reimbursement of cost of Legal Notices
APCD1982-SITE-00195	Yes	APCD2019-APP-005818	05/02/2019	Open	Carlsbad Energy Center LLC	3295666	12/03/2020	\$207.00	APCD_94	APCD_94D	Senior Engineer
APCD1982-SITE-00195	Yes	APCD2019-APP-005818	05/02/2019	Open	Carlsbad Energy Center LLC	3437313	06/21/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer
APCD1984-SITE-03438	Yes	APCD2019-APP-005733	02/27/2019	Cancelled	Otay Landfill Gas, LLC	3271619	10/28/2020	\$207.00	APCD_94	APCD_94D	Senior Engineer
APCD1989-SITE-03596	Yes	APCD2018-APP-005293	02/02/2018	Open	Sycamore Landfill Inc	3283052	11/16/2020	\$513.00	APCD_94	APCD_94C	Associate Engineer
APCD1989-SITE-07494	Yes	APCD2018-APP-005292	02/02/2018	Open	Otay Landfill Inc	3257808	10/13/2020	\$171.00	APCD_94	APCD_94C	Associate Engineer
APCD1989-SITE-07494	Yes	APCD2018-APP-005292	02/02/2018	Open	Otay Landfill Inc	3258257	10/14/2020	\$513.00	APCD_94	APCD_94C	Associate Engineer
APCD1989-SITE-07494	Yes	APCD2018-APP-005292	02/02/2018	Open	Otay Landfill Inc	3282027	11/12/2020	\$342.00	APCD_94	APCD_94C	Associate Engineer
APCD1989-SITE-07494	Yes	APCD2018-APP-005292	02/02/2018	Open	Otay Landfill Inc	3425388	06/03/2021	\$342.00	APCD_94	APCD_94C	Associate Engineer
APCD1989-SITE-07494	Yes	APCD2018-APP-005292	02/02/2018	Open	Otay Landfill Inc	3426622	06/07/2021	\$256.50	APCD_94	APCD_94C	Associate Engineer
APCD1989-SITE-07515	Yes	APCD2019-APP-005736	02/27/2019	Open	City of San Diego/Environmental Svc Dept/Miramar Landfill	3350619	03/02/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer
APCD1989-SITE-07515	Yes	APCD2019-APP-005736	02/27/2019	Open	City of San Diego/Environmental Svc Dept/Miramar Landfill	3437319	06/21/2021	\$20.70	APCD_94	APCD_94D	Senior Engineer
APCD1989-SITE-07515	Yes	APCD2019-APP-005745	03/04/2019	Open	City of San Diego Environmental Services Dept	3273447	11/02/2020	\$171.00	APCD_94	APCD_94C	Associate Engineer
APCD1989-SITE-07515	Yes	APCD2019-APP-005745	03/04/2019	Open	City of San Diego Environmental Services Dept	3289177	11/18/2020	\$256.50	APCD_94	APCD_94C	Associate Engineer
APCD1989-SITE-07515	Yes	APCD2019-APP-005745	03/04/2019	Open	City of San Diego Environmental Services Dept	3293582	11/30/2020	\$85.50	APCD_94	APCD_94C	Associate Engineer
APCD1989-SITE-07515	Yes	APCD2019-APP-005745	03/04/2019	Open	City of San Diego Environmental Services Dept	3294829	12/02/2020	\$68.40	APCD_94	APCD_94C	Associate Engineer
APCD1989-SITE-07515	Yes	APCD2019-APP-005745	03/04/2019	Open	City of San Diego Environmental Services Dept	3437317	06/21/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer

APCD1989-SITE-07515	Yes	APCD2020-APP-006545	12/04/2020	Open	City of San Diego/Environmental Svc Dept/Miramar Landfill	3326499	01/22/2021	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1989-SITE-07515	Yes	APCD2020-APP-006545	12/04/2020	Open	City of San Diego/Environmental Svc Dept/Miramar Landfill	3435453	06/17/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer
APCD1990-SITE-03325	Yes	APCD2018-APP-005299	01/22/2018	Open	SD Co of Pub Wks San Marcos Landfill	3258255	10/14/2020	\$513.00	APCD_94	APCD_94C	Associate Engineer
APCD1990-SITE-03325	Yes	APCD2018-APP-005299	01/22/2018	Open	SD Co of Pub Wks San Marcos Landfill	3258663	10/15/2020	\$256.50	APCD_94	APCD_94C	Associate Engineer
APCD1990-SITE-03325	Yes	APCD2018-APP-005299	01/22/2018	Open	SD Co of Pub Wks San Marcos Landfill	3268978	10/20/2020	\$855.00	APCD_94	APCD_94C	Associate Engineer
APCD1990-SITE-03325	Yes	APCD2018-APP-005299	01/22/2018	Open	SD Co of Pub Wks San Marcos Landfill	3269505	10/21/2020	\$684.00	APCD_94	APCD_94C	Associate Engineer
APCD1990-SITE-03325	Yes	APCD2018-APP-005299	01/22/2018	Open	SD Co of Pub Wks San Marcos Landfill	3270065	10/22/2020	\$513.00	APCD_94	APCD_94C	Associate Engineer
APCD1990-SITE-03325	Yes	APCD2018-APP-005299	01/22/2018	Open	SD Co of Pub Wks San Marcos Landfill	3271387	10/27/2020	\$427.50	APCD_94	APCD_94C	Associate Engineer
APCD1990-SITE-03325	Yes	APCD2018-APP-005299	01/22/2018	Open	SD Co of Pub Wks San Marcos Landfill	3273446	11/02/2020	\$427.50	APCD_94	APCD_94C	Associate Engineer
APCD1990-SITE-03325	Yes	APCD2018-APP-005299	01/22/2018	Open	SD Co of Pub Wks San Marcos Landfill	3274475	11/04/2020	\$855.00	APCD_94	APCD_94C	Associate Engineer
APCD1990-SITE-03325	Yes	APCD2018-APP-005299	01/22/2018	Open	SD Co of Pub Wks San Marcos Landfill	3278250	11/09/2020	\$342.00	APCD_94	APCD_94C	Associate Engineer
APCD1990-SITE-03325	Yes	APCD2018-APP-005299	01/22/2018	Open	SD Co of Pub Wks San Marcos Landfill	3290028	11/19/2020	\$769.50	APCD_94	APCD_94C	Associate Engineer
APCD1990-SITE-03325	Yes	APCD2018-APP-005299	01/22/2018	Open	SD Co of Pub Wks San Marcos Landfill	3291404	11/23/2020	\$171.00	APCD_94	APCD_94C	Associate Engineer
APCD1990-SITE-03325	Yes	APCD2018-APP-005299	01/22/2018	Open	SD Co of Pub Wks San Marcos Landfill	3424755	06/02/2021	\$342.00	APCD_94	APCD_94C	Associate Engineer
APCD1990-SITE-03325	Yes	APCD2018-APP-005299	01/22/2018	Open	SD Co of Pub Wks San Marcos Landfill	3425340	06/03/2021	\$598.50	APCD_94	APCD_94C	Associate Engineer
APCD1994-SITE-07517	Yes	APCD2019-APP-006052	10/11/2019	Open	City of San Diego - PUD, Metro Biosolids Center	3350607	03/02/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer
APCD1994-SITE-07517	Yes	APCD2019-APP-006052	10/11/2019	Open	City of San Diego - PUD, Metro Biosolids Center	3437282	06/21/2021	\$20.70	APCD_94	APCD_94D	Senior Engineer
APCD1994-SITE-07517	Yes	APCD2020-APP-006321	06/09/2020	Open	City of San Diego PUD, Metro Biosolids Center	3294828	12/02/2020	\$171.00	APCD_94	APCD_94C	Associate Engineer
APCD1994-SITE-07517	Yes	APCD2020-APP-006321	06/09/2020	Open	City of San Diego PUD, Metro Biosolids Center	3294931	12/03/2020	\$256.50	APCD_94	APCD_94C	Associate Engineer
APCD1994-SITE-07517	Yes	APCD2020-APP-006321	06/09/2020	Open	City of San Diego PUD, Metro Biosolids Center	3297958	12/07/2020	\$239.40	APCD_94	APCD_94C	Associate Engineer
APCD1994-SITE-07517	Yes	APCD2020-APP-006321	06/09/2020	Open	City of San Diego PUD, Metro Biosolids Center	3298544	12/09/2020	\$427.50	APCD_94	APCD_94C	Associate Engineer
APCD1994-SITE-07517	Yes	APCD2020-APP-006321	06/09/2020	Open	City of San Diego PUD, Metro Biosolids Center	3299468	12/10/2020	\$427.50	APCD_94	APCD_94C	Associate Engineer
APCD1994-SITE-07517	Yes	APCD2020-APP-006321	06/09/2020	Open	City of San Diego PUD, Metro Biosolids Center	3299844	12/10/2020	\$427.50	APCD_94	APCD_94C	Associate Engineer
APCD1994-SITE-07517	Yes	APCD2020-APP-006321	06/09/2020	Open	City of San Diego PUD, Metro Biosolids Center	3435470	06/17/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer
APCD1995-SITE-09138	Yes	APCD2018-APP-005446	06/26/2018	Open	SDG&E Miramar	3380955	04/15/2021	\$85.50	APCD_94	APCD_94C	Associate Engineer
APCD1995-SITE-09138	Yes	APCD2018-APP-005446	06/26/2018	Open	SDG&E Miramar	3390058	04/21/2021	\$427.50	APCD_94	APCD_94C	Associate Engineer
APCD1995-SITE-09138	Yes	APCD2018-APP-005446	06/26/2018	Open	SDG&E Miramar	3390054	04/21/2021	\$342.00	APCD_94	APCD_94C	Associate Engineer
APCD1995-SITE-09138	Yes	APCD2018-APP-005446	06/26/2018	Open	SDG&E Miramar	3425876	06/04/2021	\$342.00	APCD_94	APCD_94C	Associate Engineer
APCD1995-SITE-09138	Yes	APCD2018-APP-005446	06/26/2018	Open	SDG&E Miramar	3435352	06/17/2021	\$256.50	APCD_94	APCD_94C	Associate Engineer
APCD1995-SITE-09138	Yes	APCD2018-APP-005446	06/26/2018	Open	SDG&E Miramar	3437352	06/21/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer
APCD1995-SITE-09138	Yes	APCD2019-APP-005696	01/17/2019	Open	SDG&E - Miramar Energy Facility	3273445	11/02/2020	\$171.00	APCD_94	APCD_94C	Associate Engineer
APCD1995-SITE-09138	Yes	APCD2019-APP-005696	01/17/2019	Open	SDG&E - Miramar Energy Facility	3277895	11/09/2020	\$68.40	APCD_94	APCD_94C	Associate Engineer
APCD1995-SITE-09138	Yes	APCD2019-APP-005696	01/17/2019	Open	SDG&E - Miramar Energy Facility	3277899	11/09/2020	\$171.00	APCD_94	APCD_94C	Associate Engineer
APCD1995-SITE-09138	Yes	APCD2019-APP-005696	01/17/2019	Open	SDG&E - Miramar Energy Facility	3437324	06/21/2021	\$20.70	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09688	Yes	APCD2019-APP-006050	10/11/2019	Open	City of San Diego - PUD NC LGE - South	3437279	06/21/2021	\$20.70	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09778	Yes	APCD2018-APP-005425	06/12/2018	Open	Minnesota Methane LLC San Diego Miramar Facility	3437356	06/21/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09779	Yes	APCD2019-APP-005735	02/27/2019	Open	City of San Diego Environmental Services Dept	3437323	06/21/2021	\$20.70	APCD_94	APCD_94D	Senior Engineer
APCD1999-SITE-10882	No	APCD2018-APP-005554	09/24/2018	Open	Otay Mesa Energy Center LLC	3350604	03/02/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer
APCD1999-SITE-10882	No	APCD2018-APP-005554	09/24/2018	Open	Otay Mesa Energy Center LLC	3437337	06/21/2021	\$20.70	APCD_94	APCD_94D	Senior Engineer
APCD1999-SITE-10882	No	APCD2018-APP-005651	12/14/2018	Open	Otay Mesa Energy Center LLC	3393471	04/29/2021	\$103.50	APCD_94	APCD_94D	Senior Engineer
APCD1999-SITE-10882	No	APCD2018-APP-005651	12/14/2018	Open	Otay Mesa Energy Center LLC	3437334	06/21/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer
APCD2000-SITE-03752	Yes	APCD2020-APP-006444	09/04/2020	Open	Chula Vista Energy Center LLC	3234222	09/08/2020	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD2000-SITE-03752	Yes	APCD2020-APP-006444	09/04/2020	Open	Chula Vista Energy Center LLC	3317085	01/14/2021	\$171.00	APCD_94	APCD_94C	Associate Engineer
APCD2000-SITE-03752	Yes	APCD2020-APP-006444	09/04/2020	Open	Chula Vista Energy Center LLC	3317087	01/14/2021	\$752.40	APCD_94	APCD_94C	Associate Engineer
APCD2000-SITE-03752	Yes	APCD2020-APP-006444	09/04/2020	Open	Chula Vista Energy Center LLC	3327501	01/25/2021	\$459.00	APCD_94	APCD_94B	Assistant Engineer
APCD2000-SITE-03752	Yes	APCD2020-APP-006444	09/04/2020	Open	Chula Vista Energy Center LLC	3327908	01/26/2021	\$340.00	APCD_94	APCD_94B	Assistant Engineer
APCD2000-SITE-03752	Yes	APCD2020-APP-006444	09/04/2020	Open	Chula Vista Energy Center LLC	3329179	01/28/2021	\$595.00	APCD_94	APCD_94B	Assistant Engineer
APCD2000-SITE-03752	Yes	APCD2020-APP-006444	09/04/2020	Open	Chula Vista Energy Center LLC	3335974	02/09/2021	\$85.00	APCD_94	APCD_94B	Assistant Engineer
APCD2000-SITE-03752	Yes	APCD2020-APP-006444	09/04/2020	Open	Chula Vista Energy Center LLC	3345684	02/17/2021	\$85.00	APCD_94	APCD_94B	Assistant Engineer
APCD2000-SITE-03752	Yes	APCD2020-APP-006444	09/04/2020	Open	Chula Vista Energy Center LLC	3345627	02/17/2021	\$85.00	APCD_94	APCD_94B	Assistant Engineer
APCD2000-SITE-03752	Yes	APCD2020-APP-006444	09/04/2020	Open	Chula Vista Energy Center LLC	3346323	02/18/2021	\$340.00	APCD_94	APCD_94B	Assistant Engineer
APCD2000-SITE-03752	Yes	APCD2020-APP-006444	09/04/2020	Open	Chula Vista Energy Center LLC	3348354	02/24/2021	\$850.00	APCD_94	APCD_94B	Assistant Engineer
APCD2000-SITE-03752	Yes	APCD2020-APP-006444	09/04/2020	Open	Chula Vista Energy Center LLC	3349113	02/25/2021	\$1,020.00	APCD_94	APCD_94B	Assistant Engineer
APCD2000-SITE-03752	Yes	APCD2020-APP-006444	09/04/2020	Open	Chula Vista Energy Center LLC	3350640	03/02/2021	\$408.00	APCD_94	APCD_94B	Assistant Engineer
APCD2000-SITE-03752	Yes	APCD2020-APP-006444	09/04/2020	Open	Chula Vista Energy Center LLC	3351368	03/03/2021	\$884.00	APCD_94	APCD_94B	Assistant Engineer
APCD2000-SITE-03752	Yes	APCD2020-APP-006444	09/04/2020	Open	Chula Vista Energy Center LLC	3355154	03/08/2021	\$221.00	APCD_94	APCD_94B	Assistant Engineer
APCD2000-SITE-03752	Yes	APCD2020-APP-006444	09/04/2020	Open	Chula Vista Energy Center LLC	3355787	03/09/2021	\$68.00	APCD_94	APCD_94B	Assistant Engineer
APCD2000-SITE-03752	Yes	APCD2020-APP-006444	09/04/2020	Open	Chula Vista Energy Center LLC	3357539	03/11/2021	\$85.00	APCD_94	APCD_94B	Assistant Engineer
APCD2000-SITE-03752	Yes	APCD2020-APP-006444	09/04/2020	Open	Chula Vista Energy Center LLC	3358599	03/15/2021	\$102.00	APCD_94	APCD_94B	Assistant Engineer
APCD2000-SITE-03752	Yes	APCD2020-APP-006444	09/04/2020	Open	Chula Vista Energy Center LLC	3364930	03/17/2021	\$68.00	APCD_94	APCD_94B	Assistant Engineer
APCD2000-SITE-03752	Yes	APCD2020-APP-006444	09/04/2020	Open	Chula Vista Energy Center LLC	3399622	05/12/2021	\$272.00	APCD_94	APCD_94B	Assistant Engineer
APCD2000-SITE-03752	Yes	APCD2020-APP-006444	09/04/2020	Open	Chula Vista Energy Center LLC	3400240	05/13/2021	\$442.00	APCD_94	APCD_94B	Assistant Engineer
APCD2000-SITE-03752	Yes	APCD2020-APP-006444	09/04/2020	Open	Chula Vista Energy Center LLC	3444108	06/29/2021	\$255.00	APCD_94	APCD_94B	Assistant Engineer
APCD2000-SITE-03752	Yes	APCD2021-APP-006597	01/19/2021	Open	Chula Vista Energy Center LLC	3326686	01/22/2021	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD2000-SITE-03752	Yes	APCD2021-APP-006597	01/19/2021	Open	Chula Vista Energy Center LLC	3435446	06/17/2021	\$20.70	APCD_94	APCD_94D	Senior Engineer
APCD2001-SITE-04087	Yes	APCD2017-APP-005184	10/23/2017	Open	SDG&E Cuyamaca Peak Energy Plant	3434904	06/17/2021	\$425.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2017-APP-005184	10/23/2017	Open	SDG&E Cuyamaca Peak Energy Plant	3434873	06/17/2021	\$850.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2017-APP-005184	10/23/2017	Open	SDG&E Cuyamaca Peak Energy Plant	3443499	06/28/2021	\$255.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2017-APP-005201	11/07/2017	Open	SDG&E Cuyamaca Peak Energy Plant	3431953	06/16/2021	\$850.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2017-APP-005201	11/07/2017	Open	SDG&E Cuyamaca Peak Energy Plant	3434898	06/17/2021	\$425.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3244335	09/21/2020	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3315189	01/11/2021	\$188.10	APCD_94	APCD_94C	Associate Engineer

APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3315736	01/12/2021	\$342.00	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3316273	01/13/2021	\$940.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3323362	01/19/2021	\$718.20	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3326235	01/21/2021	\$935.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3327500	01/25/2021	\$391.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3335975	02/09/2021	\$85.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3345687	02/17/2021	\$170.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3351370	03/03/2021	\$68.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3351372	03/03/2021	\$51.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3353541	03/04/2021	\$697.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3355151	03/08/2021	\$595.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3357535	03/11/2021	\$170.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3357536	03/11/2021	\$170.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3358601	03/15/2021	\$272.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3399620	05/12/2021	\$340.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3400245	05/13/2021	\$425.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3402747	05/17/2021	\$442.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3403153	05/18/2021	\$255.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3403897	05/20/2021	\$323.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3410819	05/27/2021	\$85.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3413223	06/01/2021	\$221.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3424737	06/02/2021	\$85.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04087	Yes	APCD2020-APP-006451	09/18/2020	Open	SDG&E Cuyamaca Peak Energy Plant	3434913	06/17/2021	\$136.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04089	Yes	APCD2019-APP-006001	09/13/2019	Open	CalPeak Power - Enterprise LLC	3350653	03/02/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer
APCD2001-SITE-04089	Yes	APCD2019-APP-006001	09/13/2019	Open	CalPeak Power - Enterprise LLC	3437291	06/21/2021	\$20.70	APCD_94	APCD_94D	Senior Engineer
APCD2001-SITE-04089	Yes	APCD2020-APP-006508	11/04/2020	Open	CalPeak Power - Enterprise LLC	3274388	11/04/2020	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD2001-SITE-04089	Yes	APCD2020-APP-006508	11/04/2020	Open	CalPeak Power - Enterprise LLC	3435462	06/17/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer
APCD2001-SITE-04109	Yes	APCD2020-APP-006330	06/11/2020	Open	Larkspur Energy Facility	3399141	05/12/2021	\$136.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04109	Yes	APCD2020-APP-006330	06/11/2020	Open	Larkspur Energy Facility	3435467	06/17/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer
APCD2001-SITE-04211	Yes	APCD2019-APP-006002	09/13/2019	Open	CalPeak Power Border LLC	3350681	03/02/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer
APCD2001-SITE-04211	Yes	APCD2019-APP-006002	09/13/2019	Open	CalPeak Power Border LLC	3437290	06/21/2021	\$20.70	APCD_94	APCD_94D	Senior Engineer
APCD2001-SITE-04211	Yes	APCD2020-APP-006509	11/04/2020	Open	CalPeak Power Border LLC	3274964	11/05/2020	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD2001-SITE-04211	Yes	APCD2020-APP-006509	11/04/2020	Open	CalPeak Power Border LLC	3435460	06/17/2021	\$41.40	APCD_94	APCD_94D	Senior Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3243345	09/17/2020	\$256.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3243345	09/17/2020	\$256.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3243659	09/17/2020	\$342.00	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3243659	09/17/2020	\$342.00	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3271848	10/28/2020	\$256.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3271848	10/28/2020	\$256.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3291405	11/23/2020	\$342.00	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3291405	11/23/2020	\$342.00	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3292245	11/24/2020	\$171.00	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3292245	11/24/2020	\$171.00	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3292244	11/24/2020	\$342.00	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3293580	11/30/2020	\$342.00	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3293580	11/30/2020	\$342.00	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3294085	12/01/2020	\$256.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3294085	12/01/2020	\$256.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3294833	12/02/2020	\$855.00	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3294833	12/02/2020	\$855.00	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3294932	12/03/2020	\$855.00	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3294932	12/03/2020	\$855.00	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3297959	12/07/2020	\$444.60	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3297959	12/07/2020	\$444.60	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3298542	12/09/2020	\$427.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3298542	12/09/2020	\$427.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3299470	12/10/2020	\$427.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3299470	12/10/2020	\$427.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3299852	12/10/2020	\$427.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3299852	12/10/2020	\$427.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3307194	12/16/2020	\$427.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3307194	12/16/2020	\$427.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3307192	12/16/2020	\$427.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3307192	12/16/2020	\$427.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3307196	12/16/2020	\$427.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3307196	12/16/2020	\$427.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3307345	12/17/2020	\$427.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3307345	12/17/2020	\$427.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3308690	12/21/2020	\$171.00	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3308690	12/21/2020	\$171.00	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3309314	12/23/2020	\$256.50	APCD_94	APCD_94C	Associate Engineer

APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3309314	12/23/2020	\$256.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3311093	12/29/2020	\$85.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3311093	12/29/2020	\$85.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3312727	01/05/2021	\$119.70	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3312727	01/05/2021	\$119.70	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3313171	01/06/2021	\$171.00	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3313171	01/06/2021	\$171.00	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3316277	01/13/2021	\$85.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3316277	01/13/2021	\$85.50	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3335976	02/09/2021	\$85.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3335976	02/09/2021	\$85.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3347869	02/23/2021	\$1,190.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3347869	02/23/2021	\$1,190.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3350632	03/02/2021	\$170.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3350632	03/02/2021	\$170.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3437730	06/21/2021	\$170.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04276	Yes	APCD2017-APP-005134	09/13/2017	Open	SDG&E PALOMAR ENERGY CENTER	3437730	06/21/2021	\$170.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04276	Yes	APCD2018-APP-005375	04/16/2018	Open	San Diego Gas & Electric Company Palomar Energy Center	3243562	09/17/2020	\$103.50	APCD_94	APCD_94D	Senior Engineer
APCD2001-SITE-04276	Yes	APCD2018-APP-005375	04/16/2018	Open	San Diego Gas & Electric Company Palomar Energy Center	3298408	12/08/2020	\$513.00	APCD_94	APCD_94C	Associate Engineer
APCD2001-SITE-04276	Yes	APCD2018-APP-005375	04/16/2018	Open	San Diego Gas & Electric Company Palomar Energy Center	3355791	03/09/2021	\$85.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04276	Yes	APCD2018-APP-005375	04/16/2018	Open	San Diego Gas & Electric Company Palomar Energy Center	3390425	04/21/2021	\$85.00	APCD_94	APCD_94B	Assistant Engineer
APCD2001-SITE-04276	Yes	APCD2021-APP-006807	06/28/2021	Open	SDG&E Palomar Energy Center	3444138	06/29/2021	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD2001-SITE-04276	Yes	APCD2021-APP-006807	06/28/2021	Open	SDG&E PALOMAR ENERGY CENTER	3444138	06/29/2021	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD2001-SITE-04276	Yes	APCD2021-APP-006807	06/28/2021	Open	SDG&E PALOMAR ENERGY CENTER	3444138	06/29/2021	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD2003-SITE-04824	No	APCD2018-APP-005657	12/18/2018	Open	Hanson Aggregates Pacific Southwest Region	3310151	12/24/2020	\$517.50	APCD_94	APCD_94D	Senior Engineer
APCD2003-SITE-04824	No	APCD2018-APP-005657	12/18/2018	Open	Hanson Aggregates Pacific Southwest Region	3311796	12/31/2020	\$414.00	APCD_94	APCD_94D	Senior Engineer
APCD2003-SITE-04824	No	APCD2018-APP-005657	12/18/2018	Open	Hanson Aggregates Pacific Southwest Region	3311797	12/31/2020	\$621.00	APCD_94	APCD_94D	Senior Engineer

Total	<u><u>\$84,373.07</u></u>
-------	---------------------------

SITE_RECORD_ID	FACILITY	TRAN_DATE	INVOICE_NBR	COST/INVOICED	REVENUE/PAYMENT	FEE_ITEM	FEE_DESCIPTION
APCD1976-SITE-01130	Solar Turbines Inc	09/17/2020 09:01:41 AM	3141530		\$494.20	APCD_TVR	Federal Title V report review
APCD1979-SITE-00623	SFPP LP	03/18/2021 11:22:19 AM	3141527		\$315.00	APCD_TVR	Federal Title V report review
APCD1989-SITE-07515	City of San Diego/Environmental Svc Dept/Miramar Landfill	02/16/2021 12:48:58 PM	3344978	-\$248.40		APCD_TVR	Federal Title V report review
APCD1989-SITE-07515	City of San Diego/Environmental Svc Dept/Miramar Landfill	02/18/2021 03:04:55 PM	3346238	\$496.80		APCD_TVR	Federal Title V report review
APCD1989-SITE-07515	City of San Diego/Environmental Svc Dept/Miramar Landfill	03/10/2021 10:19:30 AM	3346238		\$496.80	APCD_TVR	Federal Title V report review
APCD1996-SITE-09779	City of San Diego Environmental Services Dept	02/16/2021 12:50:33 PM	3344980	-\$237.60		APCD_TVR	Federal Title V report review
APCD1996-SITE-09779	City of San Diego Environmental Services Dept	02/18/2021 02:53:33 PM	3346226	\$475.20		APCD_TVR	Federal Title V report review
APCD1996-SITE-09779	City of San Diego Environmental Services Dept	03/10/2021 10:53:10 AM	3346226		\$475.20	APCD_TVR	Federal Title V report review

Total	\$486.00	\$1,781.20
-------	-----------------	-------------------

SITE_RECORD_ID	APP_RECORD_ID	FACILITY	INVOICE_NBR	TRANSACTION_DATE	TRANSACTION_AMOUNT	FEE_SCHEDULE	FEE_ITEM_CODE	FEE_DESCRIPTION
APCD1976-SITE-00007	APCD2017-APP-004918	Applied Energy LLC MCRD	3101180	01/29/2020	\$1,049.10	APCD_TIV	APCD_TIV	Title V
APCD1976-SITE-00145	APCD2019-APP-005991	General Dynamics NASSCO	2997087	08/30/2019	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1976-SITE-00145	APCD2020-APP-006212	General Dynamics NASSCO	3121262	02/25/2020	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1976-SITE-00145	APCD2020-APP-006308	General Dynamics NASSCO	3178341	06/03/2020	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1976-SITE-01130	APCD2019-APP-005862	Solar Turbines Incorporated	3115788	02/13/2020	\$207.00	APCD_94	APCD_94D	Senior Engineer
APCD1976-SITE-02083	APCD2019-APP-006051	City of San Diego - PUD Point Loma Water Treatment Plant	3026764	10/16/2019	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1976-SITE-02083	APCD2019-APP-006051	City of San Diego - PUD Point Loma Water Treatment Plant	3026763	10/16/2019	\$6.15	APCD_MISC	APCD_CONVEN	2.19% Convenience Fee
APCD1976-SITE-02083	APCD2020-APP-006323	City of San Diego-Metropolitan Wastewater Dept	3181964	06/10/2020	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1978-SITE-02756	APCD2020-APP-006230	Fleet Readiness Center Southwest	3130075	03/16/2020	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1978-SITE-02756	APCD2020-APP-006301	Fleet Readiness Center Southwest	3175095	05/22/2020	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1979-SITE-00623	APCD2019-APP-005961	SFP, LP	2976812	08/07/2019	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1980-SITE-02754	APCD2019-APP-005964	USN Air Station NORIS	2979991	08/09/2019	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1980-SITE-02754	APCD2020-APP-006196	USN Air Station NORIS	3106781	02/10/2020	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1981-SITE-00250	APCD2018-APP-005297	APPLIED ENERGY LLC NAVAL STATION	3121984	02/26/2020	\$101.50	APCD_94	APCD_94D	Senior Engineer
APCD1988-SITE-00024	APCD2018-APP-005363	Applied Energy LLC North Island	3121988	02/26/2020	\$142.10	APCD_94	APCD_94D	Senior Engineer
APCD1994-SITE-07517	APCD2019-APP-006052	City of San Diego - PUD, Metro Biosolids Center	3026765	10/16/2019	\$6.15	APCD_MISC	APCD_CONVEN	2.19% Convenience Fee
APCD1994-SITE-07517	APCD2019-APP-006052	City of San Diego - PUD, Metro Biosolids Center	3026769	10/16/2019	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1994-SITE-07517	APCD2020-APP-006321	City of San Diego PUD, Metro Biosolids Center	3181963	06/10/2020	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1996-SITE-09688	APCD2019-APP-006050	City of San Diego - PUD NC LGE - South	3026760	10/16/2019	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1996-SITE-09779	APCD2018-APP-005413	City of San Diego Environmental Services Dept	3076199	12/18/2019	\$3,021.68	APCD_MISC	APCD_REF_FRF	Forfeited Refund to Customer [Calc]
APCD2001-SITE-04089	APCD2019-APP-006001	CalPeak Power - Enterprise LLC	3013857	09/18/2019	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD2001-SITE-04109	APCD2020-APP-006330	Larkspur Energy Facility	3183133	06/12/2020	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD2001-SITE-04211	APCD2019-APP-006002	CalPeak Power Border LLC	3013868	09/18/2019	\$74.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]

Total \$5,717.68

SITE_RECORD_ID	FACILITY	TRAN_DATE	INVOICE_NBR	COST/INVOICED	REVENUE/PAYMENT	FEE_ITEM	FEE_DESCRIPTION
APCD1976-SITE-00007	Applied Energy LLC MCRD	03/26/2020 09:43:45 PM	3141335	\$261.80		APCD_TVR	Federal Title V report review
APCD1976-SITE-00145	General Dynamics NASSCO	10/30/2019 12:50:29 PM	2831314		\$1,286.60	APCD_TVR	Federal Title V report review
APCD1976-SITE-00145	General Dynamics NASSCO	03/27/2020 12:08:09 PM	3141483	\$2,422.00		APCD_TVR	Federal Title V report review
APCD1976-SITE-00145	General Dynamics NASSCO	04/22/2020 11:37:22 AM	3141483		\$2,422.00	APCD_TVR	Federal Title V report review
APCD1976-SITE-01130	Solar Turbines Inc	03/27/2020 12:50:40 PM	3141530	\$494.20		APCD_TVR	Federal Title V report review
APCD1976-SITE-02083	City of San Diego-Metropolitan Wastewater Dept	03/27/2020 12:35:16 PM	3141509	\$309.40		APCD_TVR	Federal Title V report review
APCD1976-SITE-02083	City of San Diego-Metropolitan Wastewater Dept	05/27/2020 10:28:47 AM	3141509		\$309.40	APCD_TVR	Federal Title V report review
APCD1978-SITE-02756	Navy Fleet Readiness Center Southwest	03/27/2020 12:02:31 PM	3141479	\$560.00		APCD_TVR	Federal Title V report review
APCD1978-SITE-02756	Navy Fleet Readiness Center Southwest	06/05/2020 12:17:47 PM	3141479		\$560.00	APCD_TVR	Federal Title V report review
APCD1979-SITE-00623	SFPD LP	03/27/2020 12:48:37 PM	3141527	\$315.00		APCD_TVR	Federal Title V report review
APCD1980-SITE-02754	Commander Navy Region SW	01/07/2020 12:54:33 PM	2831113		\$450.30	APCD_TVR	Federal Title V report review
APCD1980-SITE-02754	Commander Navy Region SW	03/27/2020 11:50:53 AM	3141469	\$560.00		APCD_TVR	Federal Title V report review
APCD1980-SITE-02754	Commander Navy Region SW	05/20/2020 09:51:47 AM	3141469		\$560.00	APCD_TVR	Federal Title V report review
APCD1981-SITE-00250		03/26/2020 10:28:37 PM	3141336	\$400.40		APCD_TVR	Federal Title V report review
APCD1982-SITE-00195	Cabrillo Power LLC	03/27/2020 11:10:44 AM	3141437	\$737.80		APCD_TVR	Federal Title V report review
APCD1982-SITE-00195	Cabrillo Power LLC	04/24/2020 12:12:47 PM	3141437		\$737.80	APCD_TVR	Federal Title V report review
APCD1984-SITE-03438	Otay Landfill Gas LLC	03/27/2020 12:19:57 PM	3141496	\$354.20		APCD_TVR	Federal Title V report review
APCD1984-SITE-03438	Otay Landfill Gas LLC	04/29/2020 09:25:17 AM	3141496		\$354.20	APCD_TVR	Federal Title V report review
APCD1984-SITE-03594	Sycamore Energy LLC	03/27/2020 12:52:49 PM	3141531	\$407.40		APCD_TVR	Federal Title V report review
APCD1984-SITE-03594	Sycamore Energy LLC	05/15/2020 08:59:56 AM	3141531		\$407.40	APCD_TVR	Federal Title V report review
APCD1988-SITE-00024	Applied Energy North Island	03/27/2020 11:04:34 AM	3141429	\$308.00		APCD_TVR	Federal Title V report review
APCD1989-SITE-03596	Sycamore Landfill Inc	03/27/2020 12:57:38 PM	3141537	\$268.80		APCD_TVR	Federal Title V report review
APCD1989-SITE-03596	Sycamore Landfill Inc	05/18/2020 11:08:15 AM	3141537		\$268.80	APCD_TVR	Federal Title V report review
APCD1989-SITE-07494	Otay Landfill Inc	03/27/2020 12:16:10 PM	3141494	\$1,463.00		APCD_TVR	Federal Title V report review
APCD1989-SITE-07494	Otay Landfill Inc	05/15/2020 02:07:16 PM	3141494		\$1,463.00	APCD_TVR	Federal Title V report review
APCD1989-SITE-07515	City of San Diego/Environmental Svc Dept/Miramar Landfill	03/27/2020 11:47:55 AM	3141464	\$248.40		APCD_TVR	Federal Title V report review
APCD1990-SITE-03325	SD Co of Pub Wks San Marcos Landfill	03/27/2020 12:25:07 PM	3141500	\$369.00		APCD_TVR	Federal Title V report review
APCD1990-SITE-03325	SD Co of Pub Wks San Marcos Landfill	05/01/2020 02:53:39 PM	3141500		\$369.00	APCD_TVR	Federal Title V report review
APCD1992-SITE-08447	Goal Line LP	03/27/2020 12:10:47 PM	3141486	\$307.20		APCD_TVR	Federal Title V report review
APCD1992-SITE-08447	Goal Line LP	04/28/2020 11:52:10 AM	3141486		\$307.20	APCD_TVR	Federal Title V report review
APCD1994-SITE-07517	SD City of Metro Wastewater Biosolids Center	03/27/2020 12:31:25 PM	3141505	\$425.60		APCD_TVR	Federal Title V report review
APCD1994-SITE-07517	SD City of Metro Wastewater Biosolids Center	03/27/2020 01:28:23 PM	3141559	\$509.60		APCD_TVR	Federal Title V report review
APCD1994-SITE-07517	SD City of Metro Wastewater Biosolids Center	04/13/2020 09:57:22 AM	3146405	-\$425.60		APCD_TVR	Federal Title V report review
APCD1994-SITE-07517	SD City of Metro Wastewater Biosolids Center	05/27/2020 10:23:48 AM	3141559		\$509.60	APCD_TVR	Federal Title V report review
APCD1995-SITE-09138	SDG&E	03/27/2020 12:42:24 PM	3141514	\$483.00		APCD_TVR	Federal Title V report review
APCD1995-SITE-09138	SDG&E	04/27/2020 09:16:02 AM	3141514		\$483.00	APCD_TVR	Federal Title V report review
APCD1996-SITE-09688	City of San Diego Public Utilities Department	03/27/2020 11:44:07 AM	3141462	\$250.20		APCD_TVR	Federal Title V report review
APCD1996-SITE-09688	City of San Diego Public Utilities Department	05/27/2020 10:50:50 AM	3141462		\$250.20	APCD_TVR	Federal Title V report review
APCD1996-SITE-09778	Minnesota Methane LLC San Diego Miramar Facility	03/27/2020 12:05:29 PM	3141481	\$342.00		APCD_TVR	Federal Title V report review
APCD1996-SITE-09778	Minnesota Methane LLC San Diego Miramar Facility	05/15/2020 12:08:57 PM	3141481		\$342.00	APCD_TVR	Federal Title V report review
APCD1996-SITE-09779	City of San Diego Environmental Services Dept	03/27/2020 11:33:37 AM	3141452	\$237.60		APCD_TVR	Federal Title V report review
APCD1999-SITE-10882	Otay Mesa Energy Center LLC	03/27/2020 12:22:07 PM	3141499	\$560.00		APCD_TVR	Federal Title V report review
APCD1999-SITE-10882	Otay Mesa Energy Center LLC	05/06/2020 09:35:12 AM	3141499		\$560.00	APCD_TVR	Federal Title V report review
APCD2000-SITE-03752	Chula Vista Energy Center LLC	03/27/2020 11:29:38 AM	3141449	\$567.00		APCD_TVR	Federal Title V report review
APCD2000-SITE-03752	Chula Vista Energy Center LLC	04/28/2020 11:53:04 AM	3141449		\$567.00	APCD_TVR	Federal Title V report review
APCD2000-SITE-03769	Escondido Energy Center LLC	03/27/2020 12:00:23 PM	3141475	\$403.20		APCD_TVR	Federal Title V report review
APCD2000-SITE-03769	Escondido Energy Center LLC	04/28/2020 11:57:23 AM	3141475		\$403.20	APCD_TVR	Federal Title V report review
APCD2001-SITE-04087	SDG&E Cuyamaca Peak Energy Plant	03/27/2020 12:45:57 PM	3141522	\$301.00		APCD_TVR	Federal Title V report review

APCD2001-SITE-04087	SDG&E Cuyamaca Peak Energy Plant	04/27/2020 09:14:17 AM	3141522		\$301.00	APCD_TVR	Federal Title V report review
APCD2001-SITE-04089	CalPeak Power Enterprise LLC	03/27/2020 11:23:23 AM	3141446	\$1,633.80		APCD_TVR	Federal Title V report review
APCD2001-SITE-04089	CalPeak Power Enterprise LLC	04/22/2020 11:41:03 AM	3141446		\$1,633.80	APCD_TVR	Federal Title V report review
APCD2001-SITE-04109	Larkspur Energy Facility	03/27/2020 12:59:45 PM	3141539	\$294.00		APCD_TVR	Federal Title V report review
APCD2001-SITE-04109	Larkspur Energy Facility	03/27/2020 01:12:46 PM	3141551	\$210.00		APCD_TVR	Federal Title V report review
APCD2001-SITE-04109	Larkspur Energy Facility	04/13/2020 09:49:27 AM	3146402	-\$294.00		APCD_TVR	Federal Title V report review
APCD2001-SITE-04109	Larkspur Energy Facility	04/29/2020 09:15:39 AM	3141551		\$210.00	APCD_TVR	Federal Title V report review
APCD2001-SITE-04211	CalPeak Power Border LLC	03/27/2020 11:17:15 AM	3141443	\$560.00		APCD_TVR	Federal Title V report review
APCD2001-SITE-04211	CalPeak Power Border LLC	04/22/2020 11:39:12 AM	3141443		\$560.00	APCD_TVR	Federal Title V report review
APCD2001-SITE-04276	SDG&E Palomar Energy Center	03/27/2020 12:28:17 PM	3141503	\$399.00		APCD_TVR	Federal Title V report review
APCD2001-SITE-04276	SDG&E Palomar Energy Center	04/27/2020 09:13:30 AM	3141503		\$399.00	APCD_TVR	Federal Title V report review
APCD2007-SITE-06289	Orange Grove Energy LP	03/27/2020 12:12:55 PM	3141490	\$483.00		APCD_TVR	Federal Title V report review
APCD2007-SITE-06289	Orange Grove Energy LP	04/21/2020 11:42:08 AM	3141490		\$483.00	APCD_TVR	Federal Title V report review
APCD2009-SITE-06554	El Cajon Energy LLC	03/27/2020 11:55:19 AM	3141472	\$728.00		APCD_TVR	Federal Title V report review
APCD2009-SITE-06554	El Cajon Energy LLC	05/04/2020 11:44:47 AM	3141472		\$728.00	APCD_TVR	Federal Title V report review
APCD2017-APP-004918	Applied Energy LLC MCRD	01/29/2020 11:33:37 AM	3101180	\$1,049.10		APCD_TIV	Title V
APCD2017-APP-004918	Applied Energy LLC MCRD	01/29/2020 11:34:50 AM	3101180		\$1,049.10	APCD_TIV	Title V

Total	\$18,503.10	\$17,974.60
-------	--------------------	--------------------

SITE_RECORD_ID	APP_RECORD_ID	FACILITY	INVOICE_NBR	TRANSACTION_DATE	TRANSACTION_AMOUNT	FEE_SCHEDULE	FEE_ITEM_CODE	FEE_DESCRIPTION
APCD1976-SITE-00007	APCD2017-APP-004918	Applied Energy LLC MCRD	2697316	07/27/2018	\$616.00	APCD_94	APCD_94B	Assistant Engineer
APCD1976-SITE-00007	APCD2017-APP-004918	Applied Energy LLC MCRD	2697315	07/27/2018	\$616.00	APCD_94	APCD_94B	Assistant Engineer
APCD1976-SITE-00007	APCD2017-APP-004918	Applied Energy LLC MCRD	2697915	07/30/2018	\$616.00	APCD_94	APCD_94B	Assistant Engineer
APCD1976-SITE-00007	APCD2017-APP-004918	Applied Energy LLC MCRD	2700730	08/03/2018	\$1,232.00	APCD_94	APCD_94B	Assistant Engineer
APCD1976-SITE-00007	APCD2017-APP-004918	Applied Energy LLC MCRD	2700332	08/03/2018	\$924.00	APCD_94	APCD_94B	Assistant Engineer
APCD1976-SITE-00007	APCD2017-APP-004918	Applied Energy LLC MCRD	2728299	09/12/2018	\$616.00	APCD_94	APCD_94B	Assistant Engineer
APCD1976-SITE-00007	APCD2017-APP-004918	Applied Energy LLC MCRD	2728300	09/12/2018	\$616.00	APCD_94	APCD_94B	Assistant Engineer
APCD1976-SITE-01130	APCD2019-APP-005862	Solar Turbines Incorporated	2930221	06/03/2019	\$105.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1976-SITE-02083	APCD2018-APP-005411	City of San Diego-Metropolitan Wastewater Dept	2684390	07/12/2018	\$385.70	APCD_94	APCD_94D	Senior Engineer
APCD1976-SITE-02083	APCD2018-APP-005411	City of San Diego-Metropolitan Wastewater Dept	2759384	10/22/2018	\$2.30	APCD_MISC	APCD_APP_MIS	Labor charges to close Trust Account remaining balance [Calc]
APCD1978-SITE-02756	APCD2018-APP-005519	Fleet Readiness Center Southwest	2735142	09/17/2018	\$154.00	APCD_94	APCD_94B	Assistant Engineer
APCD1979-SITE-00623	APCD2018-APP-005423	SFPF, LP	2700533	08/03/2018	\$79.20	APCD_94	APCD_94D	Senior Engineer
APCD1979-SITE-00623	APCD2018-APP-005423	SFPF, LP	2717463	08/20/2018	\$4.80	APCD_TIV	APCD_TIV	Title V
APCD1979-SITE-00623	APCD2018-APP-005535	SFPF, LP	2724907	09/05/2018	\$99.00	APCD_94	APCD_94D	Senior Engineer
APCD1979-SITE-00623	APCD2018-APP-005535	SFPF, LP	2775692	11/15/2018	\$105.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1979-SITE-00623	APCD2018-APP-005535	SFPF, LP	2823790	01/23/2019	\$1.00	APCD_MISC	APCD_APP_MIS	Labor charges to close Trust Account remaining balance [Calc]
APCD1980-SITE-02754	APCD2017-APP-004903	USN Air Station NORIS	2806095	12/27/2018	\$177.00	APCD_94	APCD_94D	Senior Engineer
APCD1981-SITE-00250	APCD2018-APP-005297	APPLIED ENERGY LLC NAVAL STATION	2824812	01/25/2019	\$170.00	APCD_94	APCD_94C	Associate Engineer
APCD1981-SITE-00250	APCD2018-APP-005297	APPLIED ENERGY LLC NAVAL STATION	2825221	01/25/2019	\$255.00	APCD_94	APCD_94C	Associate Engineer
APCD1982-SITE-00195	APCD2019-APP-005818	Carlsbad Energy Center LLC	2889669	05/02/2019	\$105.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1984-SITE-03438	APCD2019-APP-005733	Otay Landfill Gas, LLC	2847630	02/27/2019	\$105.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1988-SITE-00024	APCD2018-APP-005363	Applied Energy LLC North Island	2717063	08/17/2018	\$308.00	APCD_94	APCD_94B	Assistant Engineer
APCD1988-SITE-00024	APCD2018-APP-005363	Applied Energy LLC North Island	2728332	09/12/2018	\$462.00	APCD_94	APCD_94B	Assistant Engineer
APCD1988-SITE-00024	APCD2018-APP-005363	Applied Energy LLC North Island	2728329	09/12/2018	\$308.00	APCD_94	APCD_94B	Assistant Engineer
APCD1988-SITE-00024	APCD2018-APP-005363	Applied Energy LLC North Island	2729091	09/13/2018	\$46.20	APCD_94	APCD_94B	Assistant Engineer
APCD1988-SITE-00024	APCD2018-APP-005363	Applied Energy LLC North Island	2729092	09/13/2018	\$261.80	APCD_94	APCD_94B	Assistant Engineer
APCD1989-SITE-07515	APCD2019-APP-005736	City of San Diego/Environmental Svc Dept/Miramar Landfill	2848337	02/28/2019	\$6.67	APCD_MISC	APCD_CONVEN	2.2% Convenience Fee
APCD1989-SITE-07515	APCD2019-APP-005736	City of San Diego/Environmental Svc Dept/Miramar Landfill	2848343	02/28/2019	\$105.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1989-SITE-07515	APCD2019-APP-005745	City of San Diego Environmental Services Dept	2850036	03/05/2019	\$105.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1995-SITE-09138	APCD2019-APP-005696	SDG&E - Miramar Energy Facility	2822339	01/17/2019	\$105.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1995-SITE-09138	APCD2019-APP-005696	SDG&E - Miramar Energy Facility	2822333	01/17/2019	\$11.02	APCD_MISC	APCD_CONVEN	2.2% Convenience Fee
APCD1996-SITE-09688	APCD2018-APP-005414	City of San Diego Public Utilities Department	2681678	07/06/2018	\$336.60	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09688	APCD2018-APP-005414	City of San Diego Public Utilities Department	2693224	07/18/2018	\$396.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09688	APCD2018-APP-005414	City of San Diego Public Utilities Department	2693858	07/19/2018	\$396.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09688	APCD2018-APP-005414	City of San Diego Public Utilities Department	2694445	07/20/2018	\$118.80	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09688	APCD2018-APP-005414	City of San Diego Public Utilities Department	2695872	07/24/2018	\$99.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09688	APCD2018-APP-005414	City of San Diego Public Utilities Department	2695870	07/24/2018	\$99.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09688	APCD2018-APP-005414	City of San Diego Public Utilities Department	2702052	08/07/2018	\$297.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09688	APCD2018-APP-005414	City of San Diego Public Utilities Department	2702915	08/08/2018	\$297.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09688	APCD2018-APP-005414	City of San Diego Public Utilities Department	2709542	08/14/2018	\$99.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09688	APCD2018-APP-005414	City of San Diego Public Utilities Department	2723192	08/31/2018	\$495.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09688	APCD2018-APP-005414	City of San Diego Public Utilities Department	2723194	08/31/2018	\$297.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09688	APCD2018-APP-005414	City of San Diego Public Utilities Department	2724533	09/05/2018	\$198.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09688	APCD2018-APP-005414	City of San Diego Public Utilities Department	2735171	09/17/2018	\$118.80	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09688	APCD2018-APP-005414	City of San Diego Public Utilities Department	2735056	09/17/2018	\$99.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09688	APCD2018-APP-005414	City of San Diego Public Utilities Department	2853403	03/07/2019	\$792.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09688	APCD2018-APP-005414	City of San Diego Public Utilities Department	2853388	03/07/2019	\$792.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09688	APCD2018-APP-005414	City of San Diego Public Utilities Department	2853468	03/07/2019	\$396.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09688	APCD2018-APP-005414	City of San Diego Public Utilities Department	2749252	04/10/2019	\$693.40	APCD_MISC	APCD_LGL_NOT	Reimbursement of cost of Legal Notices
APCD1996-SITE-09688	APCD2018-APP-005414	City of San Diego Public Utilities Department	2749252	04/10/2019	\$176.38	APCD_MISC	APCD_LGL_NOT	Reimbursement of cost of Legal Notices
APCD1996-SITE-09688	APCD2018-APP-005414	City of San Diego Public Utilities Department	2873409	04/10/2019	\$1,299.20	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09688	APCD2018-APP-005666	City of San Diego Public Utilities Department	2805535	12/24/2018	\$13.33	APCD_MISC	APCD_CONVEN	2.2% Convenience Fee
APCD1996-SITE-09688	APCD2018-APP-005666	City of San Diego Public Utilities Department	2853746	03/07/2019	\$594.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09688	APCD2018-APP-005666	City of San Diego Public Utilities Department	2947354	06/17/2019	\$105.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1996-SITE-09779	APCD2018-APP-005413	City of San Diego Environmental Services Dept	2697038	07/26/2018	\$891.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09779	APCD2018-APP-005413	City of San Diego Environmental Services Dept	2698140	07/30/2018	\$495.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09779	APCD2018-APP-005413	City of San Diego Environmental Services Dept	2698882	07/31/2018	\$495.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09779	APCD2018-APP-005413	City of San Diego Environmental Services Dept	2699687	08/02/2018	\$396.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09779	APCD2018-APP-005413	City of San Diego Environmental Services Dept	2709520	08/14/2018	\$118.80	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09779	APCD2018-APP-005413	City of San Diego Environmental Services Dept	2709877	08/15/2018	\$99.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09779	APCD2018-APP-005413	City of San Diego Environmental Services Dept	2721401	08/29/2018	\$237.60	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09779	APCD2018-APP-005413	City of San Diego Environmental Services Dept	2722170	08/30/2018	\$198.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09779	APCD2018-APP-005413	City of San Diego Environmental Services Dept	2735052	09/17/2018	\$99.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09779	APCD2018-APP-005413	City of San Diego Environmental Services Dept	2735051	09/17/2018	\$99.00	APCD_94	APCD_94D	Senior Engineer

APCD1996-SITE-09779	APCD2018-APP-005413	City of San Diego Environmental Services Dept	2735903	09/18/2018	\$118.80	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09779	APCD2018-APP-005413	City of San Diego Environmental Services Dept	2853517	03/07/2019	\$792.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09779	APCD2018-APP-005413	City of San Diego Environmental Services Dept	2853522	03/07/2019	\$396.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09779	APCD2018-APP-005413	City of San Diego Environmental Services Dept	2749253	04/10/2019	\$185.42	APCD_MISC	APCD_LGL_NOT	Reimbursement of cost of Legal Notices
APCD1996-SITE-09779	APCD2018-APP-005413	City of San Diego Environmental Services Dept	2873286	04/10/2019	\$142.10	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09779	APCD2018-APP-005413	City of San Diego Environmental Services Dept	2749253	04/10/2019	\$344.60	APCD_MISC	APCD_LGL_NOT	Reimbursement of cost of Legal Notices
APCD1996-SITE-09779	APCD2018-APP-005637	City of San Diego/Environmental Svc Dept	2787501	12/04/2018	\$105.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD1996-SITE-09779	APCD2018-APP-005637	City of San Diego/Environmental Svc Dept	2853763	03/07/2019	\$396.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09779	APCD2018-APP-005637	City of San Diego/Environmental Svc Dept	2853764	03/07/2019	\$396.00	APCD_94	APCD_94D	Senior Engineer
APCD1996-SITE-09779	APCD2019-APP-005735	City of San Diego Environmental Services Dept	2848323	02/28/2019	\$6.67	APCD_MISC	APCD_CONVEN	2.2% Convenience Fee
APCD1996-SITE-09779	APCD2019-APP-005735	City of San Diego Environmental Services Dept	2848345	02/28/2019	\$105.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]
APCD2000-SITE-03769	APCD2017-APP-005203	Escondido Energy Center LLC	2693458	07/18/2018	\$188.44	APCD_MISC	APCD_LGL_NOT	Reimbursement of cost of Legal Notices
APCD2000-SITE-03769	APCD2017-APP-005203	Escondido Energy Center LLC	2693458	07/18/2018	\$379.80	APCD_MISC	APCD_LGL_NOT	Reimbursement of cost of Legal Notices
APCD2000-SITE-03769	APCD2017-APP-005203	Escondido Energy Center LLC	2693458	07/18/2018	\$2,760.80	APCD_94	APCD_94D	Senior Engineer
APCD2001-SITE-04089	APCD2018-APP-005385	CalPeak Power - Enterprise LLC	2823317	01/22/2019	\$2.60	APCD_MISC	APCD_APP_MIS	Labor charges to close Trust Account remaining balance [Calc]
APCD2001-SITE-04211	APCD2018-APP-005384	CalPeak Power Border LLC	2759277	10/22/2018	\$2.60	APCD_MISC	APCD_APP_MIS	Labor charges to close Trust Account remaining balance [Calc]
	APCD2019-APP-005685	El Cajon Energy, LLC	2820534	01/15/2019	\$105.00	APCD_MISC	APCD_NBF	New Application Base Fee [FF]

Total \$26,465.43

SITE_RECORD_ID	FACILITY	TRAN_DATE	INVOICE_NBR	COST/INVOICED	REVENUE/PAYMENT	FEE_ITEM	FEE_DESCRIPTION
APCD1976-SITE-00007	Applied Energy LLC MCRD	02/07/2019 08:43:44 AM	2831058	\$478.50		APCD_TVR	Federal Title V report review
APCD1976-SITE-00007	Applied Energy LLC MCRD	03/07/2019 09:59:19 AM	2831058		\$478.50	APCD_TVR	Federal Title V report review
APCD1976-SITE-00145	General Dynamics NASSCO	02/07/2019 09:06:33 AM	2831092	\$599.20		APCD_TVR	Federal Title V report review
APCD1976-SITE-00145	General Dynamics NASSCO	02/07/2019 12:53:17 PM	2831314	\$1,286.60		APCD_TVR	Federal Title V report review
APCD1976-SITE-00145	General Dynamics NASSCO	02/07/2019 12:58:46 PM	2831322	-\$599.20		APCD_TVR	Federal Title V report review
APCD1976-SITE-01130	Solar Turbines Inc	02/07/2019 09:09:02 AM	2831094	\$163.10		APCD_TVR	Federal Title V report review
APCD1976-SITE-01130	Solar Turbines Inc	02/28/2019 09:57:08 AM	2831094		\$163.10	APCD_TVR	Federal Title V report review
APCD1976-SITE-02083	City of San Diego-Metropolitan Wastewater Dept	02/07/2019 09:10:25 AM	2831096	\$211.60		APCD_TVR	Federal Title V report review
APCD1976-SITE-02083	City of San Diego-Metropolitan Wastewater Dept	02/07/2019 09:12:19 AM	2831098	\$475.50		APCD_TVR	Federal Title V report review
APCD1976-SITE-02083	City of San Diego-Metropolitan Wastewater Dept	02/07/2019 09:13:56 AM	2831099	-\$475.50		APCD_TVR	Federal Title V report review
APCD1976-SITE-02083	City of San Diego-Metropolitan Wastewater Dept	03/18/2019 11:09:34 AM	2831096		\$211.60	APCD_TVR	Federal Title V report review
APCD1978-SITE-02756	Navy Fleet Readiness Center Southwest	02/07/2019 09:18:21 AM	2831106	\$475.50		APCD_TVR	Federal Title V report review
APCD1978-SITE-02756	Navy Fleet Readiness Center Southwest	03/13/2019 01:28:49 PM	2831106		\$475.50	APCD_TVR	Federal Title V report review
APCD1978-SITE-02756	Navy Fleet Readiness Center Southwest	05/10/2019 10:53:26 AM	2577248		\$297.70	APCD_TVR	Federal Title V report review
APCD1979-SITE-00623	SFPD LP	02/07/2019 09:19:40 AM	2831108	\$302.50		APCD_TVR	Federal Title V report review
APCD1979-SITE-00623	SFPD LP	03/06/2019 12:59:18 PM	2831108		\$302.50	APCD_TVR	Federal Title V report review
APCD1980-SITE-02754	Commander Navy Region SW	02/07/2019 09:21:45 AM	2831109	\$45,030.00		APCD_TVR	Federal Title V report review
APCD1980-SITE-02754	Commander Navy Region SW	02/07/2019 09:22:50 AM	2831110	\$302.50		APCD_TVR	Federal Title V report review
APCD1980-SITE-02754	Commander Navy Region SW	02/07/2019 09:23:58 AM	2831111	-\$45,030.00		APCD_TVR	Federal Title V report review
APCD1980-SITE-02754	Commander Navy Region SW	02/07/2019 09:25:04 AM	2831112	-\$302.50		APCD_TVR	Federal Title V report review
APCD1980-SITE-02754	Commander Navy Region SW	02/07/2019 09:25:52 AM	2831113	\$450.30		APCD_TVR	Federal Title V report review
APCD1981-SITE-00250		02/07/2019 09:29:01 AM	2831115	\$302.00		APCD_TVR	Federal Title V report review
APCD1981-SITE-00250		02/07/2019 01:05:45 PM	2831324	\$588.90		APCD_TVR	Federal Title V report review
APCD1981-SITE-00250		02/07/2019 01:06:52 PM	2831326	-\$302.00		APCD_TVR	Federal Title V report review
APCD1981-SITE-00250		03/07/2019 10:00:30 AM	2831324		\$588.90	APCD_TVR	Federal Title V report review
APCD1982-SITE-00195	Cabrillo Power LLC	06/24/2019 01:26:20 PM	2577398		\$376.60	APCD_TVR	Federal Title V report review
APCD1984-SITE-03438	Otay Landfill Gas LLC	02/07/2019 09:46:06 AM	2831134	\$139.10		APCD_TVR	Federal Title V report review
APCD1984-SITE-03438	Otay Landfill Gas LLC	02/07/2019 10:53:27 AM	2831210	\$1,354.30		APCD_TVR	Federal Title V report review
APCD1984-SITE-03438	Otay Landfill Gas LLC	02/07/2019 10:55:54 AM	2831213	-\$139.10		APCD_TVR	Federal Title V report review
APCD1984-SITE-03438	Otay Landfill Gas LLC	02/27/2019 01:32:39 PM	2831210		\$1,354.30	APCD_TVR	Federal Title V report review
APCD1989-SITE-03596	Sycamore Landfill Inc	02/07/2019 10:59:18 AM	2831217	\$529.00		APCD_TVR	Federal Title V report review
APCD1989-SITE-03596	Sycamore Landfill Inc	03/11/2019 12:59:43 PM	2831217		\$529.00	APCD_TVR	Federal Title V report review
APCD1989-SITE-07494	Otay Landfill Inc	02/07/2019 11:02:54 AM	2831222	\$597.80		APCD_TVR	Federal Title V report review
APCD1989-SITE-07494	Otay Landfill Inc	03/11/2019 12:53:59 PM	2831222		\$597.80	APCD_TVR	Federal Title V report review
APCD1989-SITE-07515	City of San Diego/Environmental Svc Dept/Miramar Landfill	02/07/2019 11:11:15 AM	2831234	\$1,065.30		APCD_TVR	Federal Title V report review
APCD1989-SITE-07515	City of San Diego/Environmental Svc Dept/Miramar Landfill	03/18/2019 11:07:56 AM	2831234		\$1,065.30	APCD_TVR	Federal Title V report review
APCD1990-SITE-03325	SD Co of Pub Wks San Marcos Landfill	02/07/2019 01:34:43 PM	2831351	\$156.00		APCD_TVR	Federal Title V report review
APCD1990-SITE-03325	SD Co of Pub Wks San Marcos Landfill	03/11/2019 01:23:33 PM	2831351		\$156.00	APCD_TVR	Federal Title V report review
APCD1992-SITE-08447	Goal Line LP	02/07/2019 01:37:26 PM	2831353	\$793.20		APCD_TVR	Federal Title V report review
APCD1992-SITE-08447	Goal Line LP	03/06/2019 01:00:23 PM	2831353		\$793.20	APCD_TVR	Federal Title V report review
APCD1994-SITE-07517	SD City of Metro Wastewater Biosolids Center	02/07/2019 01:40:10 PM	2831356	\$402.90		APCD_TVR	Federal Title V report review
APCD1994-SITE-07517	SD City of Metro Wastewater Biosolids Center	03/21/2019 01:06:38 PM	2831356		\$402.90	APCD_TVR	Federal Title V report review
APCD1995-SITE-09138	SDG&E	02/07/2019 01:42:24 PM	2831359	\$189.00		APCD_TVR	Federal Title V report review
APCD1995-SITE-09138	SDG&E	03/04/2019 01:13:09 PM	2831359		\$189.00	APCD_TVR	Federal Title V report review
APCD1996-SITE-09688	City of San Diego Public Utilities Department	02/07/2019 01:44:22 PM	2831361	\$465.80		APCD_TVR	Federal Title V report review
APCD1996-SITE-09688	City of San Diego Public Utilities Department	03/21/2019 01:07:51 PM	2831361		\$465.80	APCD_TVR	Federal Title V report review
APCD1996-SITE-09778	Minnesota Methane LLC San Diego Miramar Facility	02/07/2019 01:47:14 PM	2831363	\$430.60		APCD_TVR	Federal Title V report review
APCD1996-SITE-09778	Minnesota Methane LLC San Diego Miramar Facility	05/08/2019 01:08:07 PM	2831363		\$430.60	APCD_TVR	Federal Title V report review

APCD1996-SITE-09779	City of San Diego Environmental Services Dept	02/07/2019 01:49:57 PM	2831365	\$687.30		APCD_TVR	Federal Title V report review
APCD1996-SITE-09779	City of San Diego Environmental Services Dept	03/21/2019 01:09:05 PM	2831365		\$687.30	APCD_TVR	Federal Title V report review
APCD2000-SITE-03752	Chula Vista Energy Center LLC	02/07/2019 01:52:11 PM	2831368	\$554.00		APCD_TVR	Federal Title V report review
APCD2000-SITE-03752	Chula Vista Energy Center LLC	03/04/2019 01:35:44 PM	2831368		\$554.00	APCD_TVR	Federal Title V report review
APCD2000-SITE-03769	Escondido Energy Center LLC	02/07/2019 01:53:59 PM	2831369	\$437.90		APCD_TVR	Federal Title V report review
APCD2000-SITE-03769	Escondido Energy Center LLC	03/04/2019 01:34:29 PM	2831369		\$437.90	APCD_TVR	Federal Title V report review
APCD2001-SITE-04087	SDG&E Cuyamaca Peak Energy Plant	02/07/2019 01:56:30 PM	2831371	\$279.60		APCD_TVR	Federal Title V report review
APCD2001-SITE-04087	SDG&E Cuyamaca Peak Energy Plant	03/04/2019 01:10:31 PM	2831371		\$279.60	APCD_TVR	Federal Title V report review
APCD2001-SITE-04089	CalPeak Power Enterprise LLC	02/07/2019 01:58:31 PM	2831374	\$135.90		APCD_TVR	Federal Title V report review
APCD2001-SITE-04089	CalPeak Power Enterprise LLC	03/07/2019 10:06:30 AM	2831374		\$135.90	APCD_TVR	Federal Title V report review
APCD2001-SITE-04109	Larkspur Energy Facility	03/14/2019 11:22:16 AM	2579272		\$166.20	APCD_TVR	Federal Title V report review
APCD2001-SITE-04211	CalPeak Power Border LLC	02/07/2019 02:02:17 PM	2831378	\$785.20		APCD_TVR	Federal Title V report review
APCD2001-SITE-04211	CalPeak Power Border LLC	03/07/2019 10:06:30 AM	2831378		\$785.20	APCD_TVR	Federal Title V report review
APCD2001-SITE-04276	SDG&E Palomar Energy Center	02/07/2019 02:03:53 PM	2831379	\$437.90		APCD_TVR	Federal Title V report review
APCD2001-SITE-04276	SDG&E Palomar Energy Center	03/04/2019 01:08:34 PM	2831379		\$437.90	APCD_TVR	Federal Title V report review
APCD2007-SITE-06289	Orange Grove Energy LP	02/07/2019 02:05:28 PM	2831380	\$541.50		APCD_TVR	Federal Title V report review
APCD2007-SITE-06289	Orange Grove Energy LP	02/07/2019 02:06:59 PM	2831382	\$1,284.20		APCD_TVR	Federal Title V report review
APCD2007-SITE-06289	Orange Grove Energy LP	02/08/2019 11:22:32 AM	2831828	-\$1,284.20		APCD_TVR	Federal Title V report review
APCD2007-SITE-06289	Orange Grove Energy LP	03/18/2019 01:03:48 PM	2831380		\$541.50	APCD_TVR	Federal Title V report review
APCD2009-SITE-06554	EI Cajon Energy LLC	02/08/2019 10:52:37 AM	2831802	\$1,284.20		APCD_TVR	Federal Title V report review
APCD2009-SITE-06554	EI Cajon Energy LLC	03/01/2019 02:46:57 PM	2831802		\$1,284.20	APCD_TVR	Federal Title V report review
APCD2018-APP-005423	SFPP, LP	08/20/2018 08:55:12 AM	2717463	\$4.80		APCD_TIV	Title V
APCD2018-APP-005423	SFPP, LP	08/20/2018 08:55:49 AM	2717463		\$4.80	APCD_TIV	Title V

Total	\$15,089.20	\$14,192.80
-------	--------------------	--------------------

Appendix G. SDAPCD Record Retention Schedule

Retention Policy Schedule Report for Owning Department: APCD

09/09/2019

<u>Series</u>	<u>Description</u>	<u>Retention Time Frame</u>	<u>File Number</u>	<u>Authority Code</u>	<u>Trusted System</u>	<u>Owning Dept</u>
ADMIN - APCD COMMITTEE FILES	Internal/external advisory a committee, MT meetings, CAPCOA files. Board Res 11-0159 (Vital - No) (Historical - No) (Security - Sensitive)	2 years	Operational-3100-115	GC 26205.1	No	APCD
ADMIN-SPECIAL PROJECT RECORDS	Departmental documents on any special projects. Board Res 11-0159 (Vital - No) (Historical - No) (Security - Sensitive)	After Completion +5 Years	Administrative-2000-119	GC 26205.1	No	APCD
COM-AIR POLLUTION CONTROL HEARING BOARD RECORDS	Staff files involving hearing board matters including correspondence and research, notes, inspections reports and Variances and Petitions. Board Res 11-0159 (Vital - No) (Historical - No) (Security - Sensitive)	After Completion +7 Years	Operational-2000-101	GC 26205.1	Yes	APCD
COM-ENFORCEMENT REPORTING AND MONITORING RECORDS	Potential violations list, emission standards violations (HS Code 42706), CEM reports, cooling tower notification & registrations. Burn program: permissive burn report permits. Title V: Annual Certification, semi-annual records & monitoring, deviation reports, correspondence. NESHAP reports, ATCM reports. HS 42406, 42409, 13CCR2450 et.seq. 40CFR Pt.31.42, 40CFR Pt.51 et seq. 40CFR Pt. 61 40 CFR Pt. 70 et. (Vital - No) (Historical - No) (Security - Open to Public)	5 years	Administrative-13000-138	GC 26205.1	Yes	APCD
COM-INSPECTION/INVESTIGATION RECORDS, PORTABLE EQUIPMENT REGISTRATION PROGRAM (PERP) ASBESTOS RECORDS AND VAPOR RECOVERY RECORDS	Compliance inspection reports (excluding complaint investigations), Portable Equipment Registration Program (PERP), inspection fees, district registration program reports, breakdown reports, bulk terminal notifications, asbestos test results, asbestos notifications and respirator trainings records, vapor recovery test results and notifications. Board Res 11-0159 (Vital - No) (Historical - No) (Security- Open to Public)	5 years	Administrative-2000-124	GC 26205.1	Yes	APCD
COM-NOTICE TO COMPLY, NOTICE OF VIOLATION FILES, COMPLAINT RECORDS	Notice to comply/Notice of Violation NTC/NOV files. Complaint inspection reports and log sheets. Board Res 11-0159 (Vital - No) (Historical - No) (Security - Confidential)	After Completion +7 Years	Administrative-13000-104	GC 26205.1	Yes	APCD
ENG-EMISSION INVENTORY TOXIC HOT SPOTS NON HRA	Includes emission statements, correspondence, source test data, data requests, data submitted by facility, Trade Secret information submitted for emission inventory and non-HRA Hot Spots documents Board Res 11-0159 (Vital - No) (Historical - No) (Security - Confidential)	8 years	Administrative-12000-106	GC 26205.1	Yes	APCD

Retention Policy Schedule Report for Owning Department: APCD

09/09/2019

Series	Description	Retention Time Frame	File Number	Authority Code	Trusted System	Owning Dept
ENG-EMISSION REDUCTION CREDIT (ERC) BANKING	Emission Reduction Credit (ERC), ERC Transfers submitted for emission inventory and Trade Secret Information. Surrendered means that entire amount of the originally issued ERC has been surrendered to the District and that no amount is left. (Vital - No) (Historical - No) (Security - Confidential)	After Surrender +7 Years	Fiscal-1000-107	GC 26205.1	Yes	APCD
ENG-PERMIT FILES	Incl but not limited to App Records, Complete-Incomplete Letters, Relevant Correspondence, Public Notification, Eng Evals (signed by the Senior eng), BACT Analysis, HRA, AQIA, Calculations, Authority to Construct, Field inspection rpts and pictures, VR test results, Engineer Compliance docs, Startup Authorization, Hearing Board Decisions, Lead agency CEQA docs, Title V docs (including 502(b)(10)) and Trade Secret information. (Vital – No) (Historical – No) (Security – Confidential)	After Permit is Retired +5 Years	Operational-3100-140	GC 26205.1	Yes	APCD
ENG-TOXIC HOT SPOTS HRA	Toxic Hot Spots HRAs and associated documents: Public Notification Risk Reduction Inventory documents HRA supporting documents Board Res. 11-0159 (Vital - No) (Historical - No) (Security - Confidential)	After Obsolescence +4 Years	Administrative-12000-104	GC 26205.1	Yes	APCD
MTS - CYLINDER RECEIVING	The APCD receives hazardous materials (compressed gases). (Vital - No) (Historical - No) (Security - Open to Public)	3 years	Operational-6100-109	49CFR172.201(e)	No	APCD
MTS - CYLINDER SHIPPING	The APCD ships hazardous materials (compressed gases). (Vital - No) (Historical - No) (Security - Open to Public)	3 years	Operational-6100-115	49CFR172.201(e)	No	APCD
MTS - DEPT OF HEALTH FACILITY PERMIT	DEH permit for businesses that generate hazardous waste which must be regulated for public safety. (Vital - No) (Historical - No) (Security - Open to Public)	After Expiration of Permit	Operational-5300-106	GC 26205.1	No	APCD
MTS - EPA ID VERIFICATION REPORTS	Submit chemical information regarding hazardous materials and waste to EPA. (Vital - No) (Hisotrical - No) (Security - Open to Public)	After Expiration of Report	Operational-5300-107	GC 26205.1	No	APCD
MTS - FIRE INSPECTION REPORTS	Annual inspections by the fire department to assess and mitigate potential fire and life-safety hazards. (Vital - No) (Historical - No) (Security - Open to Public)	3 years	Operational-6100-124	GC 26205.1	No	APCD

Retention Policy Schedule Report for Owning Department: APCD

09/09/2019

Series	Description	Retention Time Frame	File Number	Authority Code	Trusted System	Owning Dept
MTS - FORECASTING AND SMOKE MANAGEMENT	Forecast files and smoke management plans. 17CCR80145 (Vital - Yes) (Historical - No) (Security - Open to Public)	25 years	Operational-3100-118	GC 26205.1	No	APCD
MTS - HAZARDOUS WASTE MANIFESTS	A shipping document that tracks hazardous waste from the point of generation to ultimate disposal. This system is commonly referred to as the "cradle to grave" system of hazardous waste management. 22 CCR 66262.40 (Vital - No) (Historical - No) (Security - Open to Public)	5 years	Operational-6100-135	40CFR262.40(a)	No	APCD
MTS - HAZMAT INSPECTION REPORTS	DEH/Hazmat inspects all laboratory safety operations with respect to Federal, State and Local requirements every 3 years. (Vital - No) (Historical - No) (Security - Open to Public)	3 years	Operational-6100-134	GC 26205.1	No	APCD
MTS - HOOD INSPECTION	DEH inspects the hoods annualy by measuring capture or fce velocity and smoke testing (Vital - No) (Historical - No) (Security - Open to Public)	After Equipment Retires +5 Years	Operational-6100-138	8CCR 5154.1(c)(2) (C)	No	APCD
MTS - INDUSTRIAL DISCHARGE REPORTS	City of San Diego Discharge Permit of industrial wastewater including sampling methods, dates, and times, dates of analyses and methods used, City staff names performing tests. (Vital - No) (Historical - No) (Security - Open to Public)	5 years	Operational-6100-139	40CFR403.12(o)	No	APCD
MTS - LABORATORY INSPECTIONS	Records of scheduled and periodic inspections required by subsection (a)(4) to identify unsafe conditions and work practices, including person(s) conducting the inspection, the unsafe conditions and work practices that have been identified and action taken to correct the identified unsafe conditions and work practices. (Vital – No) (Historical – No) (Security - Open to Public)	2 years	Operational-6100-141	8CCR3203(b)(1)	No	APCD
MTS - LABORATORY RECORDS	Laboratory records and QAQC Reports; data generated from laboratory instruments collected from field samplers. (Vital – No) (Historical – No) (Security - Open to Public)	10 years	Operational-6100-142	GC 26205.1	No	APCD
MTS - LABORATORY SAFETY TRAINING	Training and enforcement of laboratory safety policies, safety review of experimental designs; handling hazardous materials and waste and the use of Personal Protective Equipment (PPE). (Vital - No) (Historical - No) (Security - Open to Public)	After Termination +3 Years	Administrative-12000-103	40CFR265.16(e)	No	APCD

Retention Policy Schedule Report for Owning Department: APCD

09/09/2019

Series	Description	Retention Time Frame	File Number	Authority Code	Trusted System	Owning Dept
MTS – LIQUID NITROGEN TANK INSPECTION REPORTS	Recommended maintenance schedule for periodic inspections/examinations of compressed gas cylinders or related equipment. (Vital – No) (Historical – No) (Security – No)	5 years	Operational-6100-149	GC 26205.1	No	APCD
MTS - METEOROLOGY RECORDS	Non transport meteorological files Board Res 11-0159 (Vital - Yes) (Historical - Yes) (Security - Open to Public)	5 years	Operational-3100-120	GC 26205.1	No	APCD
MTS - MONITORING EQUIPMENT RECORDS	Station and equipment logs, maintenance records. Board Res 11-0159 (Vital - Yes) (Historical - Yes) (Security - Open to Public)	After Disposal of Equipment +3 Years	Operational-3100-117	GC 26205.1	No	APCD
MTS - SOURCE TEST RECORDS	Source Test Reports including Application and Renewal Reports (Vital - No) (Historical - No) (Security - Confidential)	After Equipment Retires +5 Years	Operational-3100-113	GC 26205.1	Yes	APCD
MTS - TRANSPORT ASSESSMENT RECORDS	Transport Assessment analysis files. Board Res 11-0159 (Vital - Yes) (Historical - Yes) (Security - Open to Public)	12 years	Operational-3100-119	GC 26205.1	No	APCD
PIO-SMALL BUSINESS ASSISTANCE PROGRAM RECORDS	SBA Program files (Vital - No) (Historical - No) (Security - Sensitive)	After Completion +3 Years	Administrative-2000-105	GC 26205.1	No	APCD
PLANNING & INCENTIVES - AIR QUALITY PLAN RECORDS	Regional Air Quality Strategy (RAQ's) includes final plans and updates, (IS, NOD, Neg Dec, NOP, EIR etc.) final feasibility studies for control measures, and yearly published list of regulations schedules for adoption. State Implementation Plan (SIP) includes all submittals. Board Res 11-0159 (Vital - No) (Historical - No) (Security - Open to Public)	Permanent	Operational-3100-112	GC 26205.1	Yes	APCD
PLANNING & INCENTIVES - INDIRECT SOURCES RECORDS	Meeting notes, reports, research, photos, journals, misc meeting agendas, presentations. Board Res 11-0159 (Vital - No) (Historical - No) (Security - Open to Public)	After Completion +7 Years	Administrative-2000-109	GC26205.1	Yes	APCD
PLANNING & INCENTIVES-CARL MOYER RECORDS	Project records, including Lawn and Garden equipment and including program administration records. Board Res 11-0159 Carl Moyer Program Guidelines. (Vital - No) (Historical - No) (Security - Confidential)	After Completion +3 Years	Fiscal-2500-102	GC 26205.1	Yes	APCD
PLANNING & INCENTIVES-CARL MOYER VOUCHER INCENTIVE PROGRAM VIP	Carl Moyer VIP project records. Carl Moyer Program Guidelines, Board Res 11-0159 (Vital - No) (Historical - No) (Security - Confidential)	After Award +5 Years	Fiscal-2500-105	GC 26205.1	Yes	APCD

Retention Policy Schedule Report for Owning Department: APCD

09/09/2019

Series	Description	Retention Time Frame	File Number	Authority Code	Trusted System	Owning Dept
PLANNING & INCENTIVES-GOODS MOVEMENTS EMISSION REDUCTION PROGRAM RECORDS	Goods Movements Emission Reduction Program (GMERP) project files, original file records go to ARB after completion. GMERP Program Guidelines Board Res 11-0159 (Vital - No) (Historical - No) (Security - Confidential)	After Completion	Fiscal-2500-104	GC 26205.1	Yes	APCD
PLANNING & INCENTIVES-LOW-EMISSION SCHOOL BUS INCENTIVE PROGRAM RECORDS	Low Emission School Bus Program (LESB) project files. LESB Program Guide GC26205.1 Board Res 11-0159 (Vital - No) (Historical - No) (Security - Sensitive)	After Completion +2 Years	Fiscal-2500-103	GC26205.1	Yes	APCD
PLANNING & INCENTIVES-MITIGATION FUND RECORDS	Miscellaneous file records. (Vital - No) (Historical - No) (Security - Confidential)	After Completion +2 Years	Fiscal-1000-117	GC 26205.1	Yes	APCD
PLANNING & INCENTIVES-TRAFFIC ABATEMENT AIR POLLUTION EMERGENCY PREVENTION PLAN RECORDS	Final plans and updates. Board Res 11-0159 40 CFR51.150 et seq (Vital - No) (Historical - No) (Security - Open to Public)	After Obsolescence +3 Years	Operational-3100-102	GC 26205.1	Yes	APCD
RULES-RULE DEVELOPMENT RECORDS	Rulemaking files, including petitions for rule adoption/amendments/repeal from interested persons requesting such action, notices of proposed adoption, data and factual information in support, comments received, final department rules and regulations and Trade Secret and Attorney-Client Privileged rules making files. HS40728 GC 26205.1 Board Res 11-0159 (Vital - No) (Historical - No) (Security - Confidential)	Permanent	Operational-3100-106	HS 40728	Yes	APCD
RULES-RULE DEVELOPMENT REFERENCE FILES	Memos, drafts, transmittal letters not required per to be retained by HS40728 GC26205.1 Board Res 11-0159 (Vital - No) (Historical - No) (Security - Open to Public)	After Obsolescence +2 Years	Administrative-2000-113	GC 26205.1	Yes	APCD

Appendix H. Engineering Division Manual of Operating Procedures

Engineering Division Manual of Procedures

Version 8.01

**San Diego Air Pollution Control District
10124 Old Grove Road
San Diego, CA 92123**

March 2022

1.	GENERAL ENGINEERING DIVISION PROCEDURES.....	6
1.1	PUBLIC INFORMATION REQUESTS	6
1.2	MEDIA CONTACTS (JULY 2021)	6
1.3	SAFETY PROGRAM	6
1.4	CUSTOMER SERVICE SURVEY FORMS.....	6
1.5	EMPLOYEE RECOGNITION AND AWARDS PROGRAM (REVISED JULY 2012)	7
1.6	TRADE SECRET” DESIGNATION (JANUARY 8, 2004, TOM WEEKS/TERRY DUTTON)	8
1.7	ANNUAL REVIEW OF PERMITS (TOM WEEKS, APRIL 2008).....	11
1.8	NOTICE PROCEDURE FOR PERMIT CONDITION CHANGES (TOM WEEKS, APRIL 2008).....	13
1.9	CUSTOMER SERVICE FOR PHONE AND WALK-IN CUSTOMERS (TOM WEEKS, MAY, 2010, REVISED MARCH 2013) ...	15
1.10	EXPECTATIONS FOR ENGINEERS WORKING ON PERMIT APPLICATIONS	15
2.	PERMIT APPLICATION PROCESSING - GENERAL	17
2.1	EARLY ASSISTANCE/PRE-APPLICATION PROCEDURES (MIKE LAKE, AUGUST 13, 1993).....	17
2.2	CEQA.....	21
2.3	APPLICATION SCHEDULE MANAGEMENT	30
2.4	APPLICATION FISCAL MANAGEMENT	35
2.5	BCMS PROCEDURES.....	47
2.6	REACTIVATION OF INACTIVE STATUS PERMITS (TOM WEEKS, APRIL 2009).....	73
2.7	PERMIT PROCESS OVERVIEW (NICK HORRES, OCTOBER 2020)	74
3.	REQUIREMENTS FOR ISSUING AUTHORITIES TO CONSTRUCT (A/CS)	81
3.1	PERMIT EVALUATION GUIDELINES (TOM WEEKS, OCTOBER, 2007, REVISED APRIL 2009, FEBRUARY 2013)...	81
3.2	REQUIREMENTS FOR ISSUING A/Cs (JANUARY 7, 1982)	85
3.3	CREATING AND APPLYING PERMIT CONDITIONS (OCTOBER 2020, NICK HORRES).....	86
3.4	ISSUANCE OF AUTHORITY TO CONSTRUCT LETTERS	92
3.5	AUTHORITY TO CONSTRUCT EVALUATION LANGUAGE (FEBRUARY 27, 1980).....	93
3.6	AB3205 REVIEW/NOTIFICATION PROCEDURES (JULY 28, 1989, REVISED APRIL 2009, REVISED DECEMBER 2014)	94
3.8	RULE APPLICABILITY – NEW RULE ADOPTION (JANUARY 8, 1982).....	98
3.9	EXPEDITED APPLICATION PROCESSING PROCEDURE (TOM WEEKS, SEPTEMBER 1, 2004).....	98
3.10	SUPPLEMENTAL EXPEDITED APPLICATION PROCESSING GUIDANCE (TOM WEEKS, OCTOBER 2005, MODIFIED APRIL 2009)	100
3.11	APPLICATION TRACKING DATA (NOVEMBER 8, 1993)	101
3.12	VERBAL PERMITS NOT ALLOWED (DECEMBER 18, 1979)	103
3.13	APPLICATION CANCELLATIONS (NOVEMBER 1990)	103
3.14	A/C REQUIRING EMISSION SOURCE TESTING (OCTOBER 20, 1992)	103
3.15	INDEPENDENT SOURCE TEST CONTRACTOR POLICY (JANUARY 29, 1999).....	104
3.16	EMISSION FACTORS AND CALCULATION METHODOLOGIES (TOM WEEKS, OCTOBER 5, 2000)	105
3.17	PERMIT CONDITIONS FOR AB2588 AIR TOXIC “HOT SPOTS” (AUGUST 21, 1989).....	105
3.18	PERMIT APPLICATION CHECKLISTS (MAY 6, 1999)	105
3.19	AGRICULTURAL EXEMPTIONS FROM P/OS (OCTOBER 16, 1974).....	106
3.20	TANK TRUCK EXEMPTIONS FROM P/OS (SEPTEMBER 29, 1977)	106
3.21	A/CS REQUIRED FOR PORTABLE EQUIPMENT (NOVEMBER 9, 1976).....	106
3.22	BASIS FOR PERMIT CONDITIONS	106
3.23	PERIODIC SOURCE TESTING GUIDANCE (TOM WEEKS, JUNE, 2011).....	107
3.24	BCMS STEPS FOR ISSUING AN A/C (OCTOBER, 2020)	108
3.25	GUIDANCE ON PERFORMING THE COMPLETENESS REVIEW (OCTOBER, 2020)	112
3.26	DOCUMENTS REQUIRED TO BE UPLOADED DURING A/C EVALUATION (OCTOBER, 2020).....	115
3.27	A/C EXTENSION REQUESTS (OCTOBER, 2020)	116
3.28	APPLICATION DEADLINE (RULE 18) EXTENSIONS	119

Engineering Division Manual of Procedures

3.29	APPLICATION REVIEW REGULATORY DEADLINES.....	119
3.30	DOCUMENTING PUBLIC COMMENTS RECEIVED.....	120
3.31	SUGGESTED A/C PERMIT EVALUATION PROCESS	122
4.	NEW SOURCE REVIEW.....	123
4.1	INTERPRETATION OF RULE 20.2(D) (AUGUST 11, 1986)	123
4.2	EMISSIONS COUNTING FOR NSR RULES (APRIL 9, 1980).....	123
4.3	CUMULATIVE NSR EMISSIONS SUMMARY SHEETS (DECEMBER 3, 2002)	123
4.4	RACT/BACT/LAER CLEARINGHOUSE SUBMITTALS (TOM WEEKS, DECEMBER 3, 2002, REVISED 2/2012) .	126
4.5	REPEAL OF STATE OFFSET REQUIREMENTS (DECEMBER 23, 1998)	126
4.6	INTERPRETATION OF RULE 20.3(D)(4)(I) PROCEDURE REGARDING TIMING OF FINAL ACTIONS ON APPLICATIONS REQUIRING PUBLIC NOTICE AND A 30-DAY COMMENT PERIOD (NOVEMBER 24, 1999)	126
4.7	AIR QUALITY IMPACT MODELING REFERRALS (SEPTEMBER 24, 1993).....	127
4.8	EPA ALLOWABLE PRECONSTRUCTION ACTIVITY GUIDELINES (NOVEMBER 4, 1993).....	127
4.9	EPA NOTIFICATIONS REQUIRED (JUNE 8, 1992)	128
4.10	NOTICE OF EPA OF BANKING ACTIONS	129
4.11	IMPLEMENTATION OF 1998 NSR REVISIONS (DECEMBER 1998)	130
5.	TOXIC NEW SOURCE REVIEW	135
5.1	RULE 1200 TOXIC SCREENING PROCEDURE AND SCREENING EMISSION RATES (APRIL 12, 1998, MODIFIED APRIL, 2009, MODIFIED SEPTEMBER 2, 2010, MODIFIED MAY 2012, MODIFIED FEBRUARY 2016)	135
5.2	RULE 1200 REQUIREMENTS FOR HEALTH RISK ASSESSMENT (TOM WEEKS, FEBRUARY 2001, MODIFIED APRIL 2009)	154
5.3	SUPPLEMENTAL GUIDANCE FOR RULE 1200 HRA REVIEW (TOM WEEKS, SEPTEMBER 2004)	162
5.4	RULE 11(A)(6) INTERPRETATION (TOM WEEKS, NOVEMBER, 2010)	163
5.5	PROCEDURE FOR UPDATING TABLES IN RULE 1200 AND 1210	164
6.	PERMIT TO OPERATE EVALUATIONS	164
6.1	P/O ENGINEER EVALUATION REQUIREMENTS AND PROCESS (OCTOBER, 2020, NICK HORRES)	164
6.2	CREATING CONDITIONS FOR PTOs (OCTOBER, 2020 NICK HORRES).....	166
6.3	PERMIT CONDITION LANGUAGE GUIDANCE (OCTOBER, 2020 NICK HORRES)	169
6.4	PREPARING A PTO IN BCMS.....	170
6.5	PERMIT STREAMLINING (OCTOBER, 2020).....	177
6.6	DENIALS (OCTOBER 9, 1981)	177
6.7	REVIEW OF CONDITIONS BY APPLICANTS (OCTOBER 2020)	180
6.8	APPLICATIONS REQUIRED FOR EXPIRED PERMITS (APRIL 24, 1979)	180
6.9	DOCUMENTS TO BE UPLOAD PRIOR TO SUBMITTING THE PTO FOR APPROVAL	180
7.	STARTUP AUTHORIZATION (S/A).....	181
7.1	S/A ISSUANCE (FEBRUARY 22, 1984).....	181
7.2	IMPLEMENTATION PROCEDURES FOR RULE 24 (JULY 1, 1997)	182
7.3	EQUIPMENT DEFICIENCY LETTERS (FEBRUARY 22, 1984).....	191
7.4	S/As vs. AECPS (JUNE 18, 1990).....	191
7.5	EXPIRED S/As (OCTOBER 21, 1991)	191
7.6	STARTUP AUTHORIZATION/PERMIT TO OPERATE PROCEDURES (MARCH 29, 1993)	192
8.	TITLE V PERMITS.....	193
8.1	INSTRUCTIONS FOR TITLE V APPLICATION	193
8.2	INSTRUCTIONS FOR TITLE V ENGINEERING EVALUATION PROCESS (REVISED 3/2014)	204
8.3	TITLE V PERMIT CHANGES AND MODIFICATIONS.....	206
8.4	TITLE V PROGRAM EVALUATION PROGRAM CHANGES (TOM WEEKS, NOVEMBER 2010).....	213
9.	REGISTRATION.....	219

Engineering Division Manual of Procedures

9.1	PORTABLE ENGINE PERMITTING AND REGISTRATION (NOVEMBER 6, 2000)	219
9.2	PROCEDURE FOR REVIEW OF APPLICATIONS AND ISSUANCE OF CERTIFICATES OF REGISTRATION (JANUARY 2008)	219
10.	BANKING	221
10.1	BANKING PROCEDURES (JULY 22, 1986)	221
11.	CERTIFICATE OF EXEMPTION (COE).....	230
11.1	CERTIFICATE OF EXEMPTION (COE) PROCEDURES (JUNE 1, 2000)	230
12.	CHEMICAL SECTION PROCEDURES	235
12.1	S/A VS. ALTERNATIVE EMISSIONS COMPLIANCE PLAN (AECPP) (JUNE 18, 1990)	235
12.2	RULE 66	235
12.3	PROCEDURES FOR ESTIMATING THE VAPOR PRESSURE OF VOC MIXTURES (JUNE 20, 1990)	237
12.4	EQUIPMENT DESCRIPTIONS FOR SURFACE COATING OPERATIONS (FEBRUARY 10, 1983)	246
12.5	STREAMLINED PERMIT PROCESS REVIEW (JUNE 21, 1993)	246
12.6	RULE 67.5 APPLICABILITY TO SLIP CASTING OPERATIONS (JULY 9, 1992)	248
12.7	FEDERAL RESTRICTIONS ON USES OF HCFCs	248
12.8	DRY CLEANING OPERATIONS USING SILICONE SILOXANE.....	249
13.	MECHANICAL SECTION PROCEDURES	249
13.1	RULE 50 ASPHALT PLANT BLUE SMOKE (MARCH 22, 1985)	249
13.2	ALLOCATION OF REGISTRATION FEES UNDER RULE 12.1	249
13.3	RULE 12 REGISTRATION APPLICATION PROCESSING (DECEMBER 30, 1997)	250
13.4	APPLICABILITY OF RULES 52, 53, AND 54. (MAY 12, 1999)	251
13.5	EMERGENCY GENERATORS, HORSEPOWER USED FOR EXEMPTION (JULY 1987)	252
13.6	MINERAL INDUSTRY EMISSION CALCULATIONS PROCEDURE (APRIL 9, 1996).....	252
13.7	MINERAL INDUSTRY EMISSION CALCULATIONS PROCEDURES (NOVEMBER 5, 1999)	266
13.8	CLARIFICATIONS TO RULE 69.2 REQUIREMENTS (NOVEMBER 6, 2000)	268
13.9	PERMITTING OF NEW EMERGENCY BACKUP GENERATORS (MIKE LAKE – JULY 6, 2001, REVISED DECEMBER 2010)	272
13.10	RULE 69.4.1 REQUIREMENTS - NEW NATURAL GAS-FUELED EMERGENCY STANDBY ENGINES (FEBRUARY 7, 2002)	275
13.11	STARTUP/COMMISSIONING PERIODS FOR TURBINES AND ENGINES (FEBRUARY 11, 2003)	276
13.12	EVALUATION OF 40 HOUR TESTING AND MAINTENANCE ALLOWANCE FOR HOSPITAL FACILITIES (JULY 7, 2007 – TOM WEEKS).....	278
13.13	MOBILE/PORTABLE VS. STATIONARY ENGINES - RULES 69.4 AND 69.4.1 APPLICABILITY (MAY 17, 2001 – M. LAKE/T. MORRIS).....	278
13.14	PROCEDURE FOR REVIEW OF APPLICATIONS AND ISSUANCE OF CERTIFICATES OF REGISTRATION.....	280
14.	VAPOR RECOVERY SECTION PROCEDURES.....	281
14.1	RULE 61.3 ENFORCEMENT POLICY (MAY 25, 2000 – ROSA SALCEDO)	281
14.2	RULE 61.2 TRANSFER OF VOLATILE ORGANIC COMPOUNDS (VOCs) INTO MOBILE TRANSPORT TANKS (DECEMBER 10, 1979)	282
14.3	ISSUANCE OF A/Cs AND P/OS TO VAPOR RECOVERY (VR) SYSTEMS CERTIFIED BY AIR RESOURCES BOARD (OCTOBER 24, 2000 – ROSA SALCEDO)	282
14.4	DOCUMENTING VR VIOLATIONS BY ENGINEERS (AUGUST 20, 1979)	282
14.5	VAPOR RECOVERY STATION REBUILDS (JULY 28, 1994)	283
14.6	INSPECTION/MAINTENANCE MANUALS AT SERVICE STATIONS (DECEMBER 4, 2001)	283
14.7	TEST CANCELLATION FEE (JULY 5, 2000 – ROSA SALCEDO)	283
14.8	INVOICING FOR REINSPECTION (JULY 5, 2000).....	284
14.9	APPLICABILITY OF RULE 1200 TO GASOLINE DISPENSING FACILITIES (OCTOBER 2, 2003)	286

Engineering Division Manual of Procedures

15.	EMISSIONS INVENTORY PROCEDURES (M LUTHER, JANUARY 2021).....	287
15.2	GUIDE TO EIS	295
16.	TOXICS “HOT SPOTS” PROCEDURES (M LUTHER, REV. MAR 2022).....	337

1. General Engineering Division Procedures

The Engineering Division processes permit applications for new, relocated and modified emission units as well as banking applications and applications for Title V permits. New and modified emission units are evaluated for compliance with New Source Review (NSR) requirements (if applicable) and specific emission standards prior to issuing an Authority to Construct (A/C) or Permit to Operate (P/O). This manual presents guidance and procedures to be used by Engineering Division staff in processing applications.

1.1 Public Information Requests

Reserved

1.2 Media Contacts (July 2021)

From time to time the media contacts the District to obtain information or ask questions related to a specific facility, permit application, inspection, complaints, District rules, regulations or programs or District policies. All media inquiries or media contacts that you receive must be referred to the Chief and/or to the Deputy Director overseeing the division. If you receive a phone call, email or other in person inquiries from a reporter (TV, Radio, etc.) or other media representative, you do not need to respond to the inquiry but please forward that request to the Chief or Deputy Director immediately.

1.3 Safety Program

1.3.1 Respiratory Protection Program

Reserved

1.3.2 Safety Shoe Policy (October 12, 2000)

The District will provide up to \$90.00 for the purchase of safety shoes for Air Quality Inspectors I and II, and all other District field staff on a yearly basis or as requested.

All safety shoes will be purchased through various vendors and require an authorization letter from the accounting department prior to purchase.

Safety shoes must be worn at all times when work is performed that may result in foot injury. Districts purchased safety shoes are not to be worn on personal business (March 21, 1986).

1.4 Customer Service Survey Forms

Engineering Division Manual of Procedures

Customer service surveys will be used to ensure the satisfaction of external customers and to recognize staff for their high level of customer service. Surveys will be used to evaluate customer satisfaction for each of the following activities:

- Authority to Construct Permits
- Permits to Operate
- Emission Inventory Reports
- .

1.5 Employee Recognition and Awards Program (revised July 2012)

The Engineering Division Awards Program shall be conducted in accordance with District Policy and the following requirements. Changes may be made to this policy at any time by a majority vote of the Engineering Division Awards Committee with the concurrence of the Engineering Division Chief.

A. Engineering Awards Committee

The Committee will be comprised of senior staff of the Division.

B. Awards

Awards will be made up to quarterly but not less than biennially. The awards will be presented at the Division staff meeting. The cash value of awards shall be established by Department Management. The cash value of awards may adjusted by direction of the Director.

1) Maximum Award

The maximum total award, per person per fiscal year, will not exceed \$1,000.00 cash or 24-hours of Employee Recognition Leave.

2) Eligibility Standards

All employees or teams in the District are eligible for the award. Awards for recognition shall be based strictly on performance, not on popularity, seniority, or the number of awards previously received. However, an employee or team shall not receive a Division and a District award for the same event. Nominees must have demonstrated sustained high quality or extraordinary effort in one or more of the following categories:

- Customer/Public Service
- Productivity
- Achievement in Special Projects
- Outstanding Quality/Job Well Done

Engineering Division Manual of Procedures

- Leadership
- Total Involvement
- Continuous Process Improvement

3) Nomination and selection process

- Only one award will be granted to an individual/team in one fiscal year. If more than one nomination for the same person or team is selected for an award that person/team will receive only one award and the other nominations bearing the name of that person/team will be removed.
- Any member of the Engineering Division can make nominations. Nominations shall be directed to the nominee's supervisor who will evaluate nominations prior to submitting them to the awards committee. Nominations may be submitted at any time during the year. The nominations shall be performance based.
- Committee members will individually review and evaluate the nominations, considering the eligibility standards and score each on a scale of 0-10. The Chief shall fill out a ranking sheet and average the points for each candidate.
- The Chief or a designee will present the awards.
- Generally, all awards will be issued for the fiscal year at a Division meeting. The Committee shall complete and submit the selection documentation at least one week prior to the awards ceremony to ensure monetary awards come from the current fiscal budget.

4) Reporting

The Chief or the chief's designee will be responsible for maintaining a record of employees selected for awards, their accomplishments, the award they received and the name of the person nominating the individual for the award. This information and a copy of the nomination forms will be conveyed to the Chief of Support Services annually for the inclusion in the annual report of awards to the CAO.

1.6 Trade Secret" Designation (January 8, 2004, Tom Weeks/Terry Dutton)

District Rule 176 specifies District policy with respect to information supplied to the District. In addition, confidential communications between attorneys and their clients are privileged and are to be protected from disclosure to anyone except authorized District or County staff. This document specifies procedures used to manage and protect trade secret and attorney-client information.

Engineering Division Manual of Procedures

Identification and Justification of Trade Secrets

To facilitate segregation and protection of trade secrets, it is necessary that the applicant/facility clearly identify and provide justification for all information claimed to be trade secret. It is the responsibility of the District associate that receives the information to ensure that this happens. The following statement should be used to ensure that this occurs:

Permit Process:

Your application submittal includes information that you have identified as “trade secret.” All information claimed to be Trade Secret must be clearly identified to allow the District to separate it from non-Trade Secret information. To identify the information you may use a highlighter or you may physically separate all trade secret information from the remainder of the application submittal.

Please provide a written justification for information considered confidential or “trade secret” as required by District Rule 176. The justification should explain why the information is “trade secret” as defined in District Rule 175(a)(3) and should be as detailed as possible without disclosing the “trade secret”, as the justification is considered public record. With written justification, this information will be designated “trade secret” and will be disclosed by the District only in accordance with District Rule 177(g).

Upon receipt of an application containing claimed trade secret information the permit engineer should include these paragraphs in an “incomplete” letter when a trade secret justification has not been provided.

Emission Inventory Process:

The following paragraphs should be included in all emission inventory request packages:

All information claimed to be Trade Secret must be clearly identified to allow the District to separate it from non-Trade Secret information. To identify the information you may use a highlighter or you may physically separate all trade secret information from the remainder of the emission inventory submittal.

Please provide a written justification for information considered confidential or “trade secret” as required by the District Rule 176. The justification should be as detailed as possible without disclosing the “trade secret” as the justification is considered public record. With written justification, this information will be designated “trade secret” and will be disclosed by the District only in accordance with District Rule 177(g).

Compliance Process:

Information and/or documents labeled “trade secret” and gathered during an inspection shall be filed in the inspector’s vehicle with the field file or in the appropriate senior

Engineering Division Manual of Procedures

inspector's office. Additionally, the "trade secret" documents shall be segregated using red file folders. This information shall not be filed in the main filing system.

Filing and Protection of Trade Secrets

Trade secret information should be separated from non-trade secret information in District files to ensure that it is adequately protected. This will involve use of red trade secret file folders. The District associate that receives information claimed to be trade secret shall separate that information into the Trade Secret File Folders. Trade Secret File Folders shall be stored with standard permit, emissions inventory and other publicly available folders so that all information relating to the permit, emission inventory or compliance is easily accessible.

District associates are not expected to make judgments concerning the validity of trade secret claims. Information that is claimed to be trade secret and provided with written justification, should be treated as trade secret. Health and Safety Code section 44346 and District Rule 177(g) procedures are to be followed in the event that there are public requests for information that has been designated trade secret.

Rule 176(a) requires the District to give notice in writing that the information provided may be released (1) to the public on request, except trade secrets which are not emissions data, and (2) to the Federal Environmental Protection Agency, which protects trade secrets as provided in Section 114(c) of the Clean Air Act, and in Title 40 of the Code of Federal Regulations, Chapter 1, Part 2. To implement these provisions, the following statement shall be included on the general permit application form and in all emission inventory request forms:

In accordance with District Rule 176, information provided may be released (1) to the public on request, except trade secrets which are not emissions data, and (2) to the Federal Environmental Protection Agency, which protects trade secrets as provided in Section 114(c) of the Clean Air Act, and in Title 40 of the Code of Federal Regulations, Chapter 1, Part 2.

Please confer with County Counsel if EPA, ARB or another agency or County department requests access to designated trade secret information.

Protection of Attorney Client Privilege Information

When an attorney communicates with a client, or a client communicates with an attorney in confidence, regarding legal advice, strategy, or other legal information, the law provides that such confidential communications are privileged, and are protected from disclosure to non-clients. The protection applies to such communications between District (and County) staff and County Counsel attorneys, whether the communications are oral, electronic or in writing; notes made about privileged conversations are also privileged.

Engineering Division Manual of Procedures

Unauthorized disclosures of attorney-client privileged communications might cause waiver of the privilege even for other communications, and can jeopardize the District's or the County's interests. Therefore care must be taken to ensure against unauthorized disclosures of attorney-client privileged communications.

To protect confidential attorney-client privileged communications, all written confidential material should be separated from non-confidential material and placed in a file conspicuously marked "Privileged and Confidential Attorney-Client Communication – DO NOT MAKE PUBLIC."

When sending written communications to a County Counsel attorney, the following statement should be included in the upper right-hand corner of the correspondence:

CONFIDENTIAL
ATTORNEY-CLIENT
COMMUNICATION

For e-mail messages to a County Counsel attorney relating to any legal matters or issues, the subject line of the e-mail should state: **"Confidential: Attorney-Client Privileged Communication."** □ The e-mail must be transmitted confidentially to the attorney so that it is not also transmitted to any non-District or non-County third parties.

Never turn over or agree to turn over a confidential attorney-client privileged document, or any part of such a document, without first consulting with County Counsel. If disclosure of a confidential communication from County Counsel is requested or desired, first contact County Counsel, then obtain authorization from the Director, Assistant Director or Division Chief. Also, all references to "confidential" or "attorney-client privileged" must be removed from any copy of material authorized to be released.

1.7 Annual Review of Permits (Tom Weeks, April 2008)

California Health and Safety Code section 42301(e) specifies that permit systems must incorporate provisions for annual review of permits prior to renewal. Specifically the section states that the permit systems shall:

"Require, upon annual renewal, that each permit be reviewed to determine that the permit conditions are adequate to ensure compliance with, and the enforceability of, district rules and regulations applicable to the article, machine, equipment or contrivance for which the permit was issued which were in effect at the time the permit was issued or modified, or which have subsequently been adopted and made retroactively applicable to the existing article, machine, equipment, or contrivance, by the district board and, if the permit conditions are not consistent, require that the permit be revised to specify the permit conditions in accordance with all applicable rules and regulations."

The District uses four processes to accomplish this requirement: 1) condition change requests that result from review of permit conditions by the Compliance Division during

Engineering Division Manual of Procedures

inspections; 2) global permit reviews by fee schedule; 3) general annual permit reviews; and 4) review of reactivated permits. These processes are described in detail below.

1) Condition Change Requests - As part of the Compliance Division inspection process, all permit conditions are reviewed to ensure that they reflect current requirements and are enforceable. If a permit condition is not enforceable, or consistent with existing rules and/or other applicable requirements, a “Request for Change of Permit Conditions” form is prepared and submitted in accordance with Compliance Division Policy 2.18.

Condition change requests are used only for changes that are site-specific. If issues of clarity, enforceability and consistency are identified that affect multiple permits, the issues should be forwarded to the Permit Streamlining Committee for evaluation. These changes are handled using the fee schedule based permit reviews (number 2 below).

2) Fee Schedule Based Permit Reviews - Permits are reviewed periodically by a committee consisting of representatives of the Engineering and Compliance Divisions with input, on an as needed basis, from the Monitoring and Technical Services Division and Permit Processing Section. Reviews are conducted on each BEC in a specific fee schedule. The goal of periodic permit review is to address global issues that affect numerous permits. Examples of these global issues include: changes that are necessary as the result of revised rules, changes to address enforceability concerns or condition clarity, changes to address new permitting or compliance policy, and changes to standardize permit condition language and consolidate BECs. The Permit Streamlining Committee maintains a list of the “global” issues that can be used as a guide when reviewing conditions. Steps of the periodic review process are as follows:

- A) The Permit Streamlining workgroup (or a subcommittee of the PSL) prioritizes fee schedules for review.
- B) BECs in fee schedule under review are consolidated where possible.
- C) Each BEC (after consolidation) is reviewed and problem conditions (including those identified on the Global Permit Condition List) are identified.
- D) Revised versions of the problem conditions are prepared, reviewed and approved by the workgroup.
- E) A 30-day notice letter is prepared (see “Notice Procedure for Permit Condition Changes” below).
- F) The 30-day notice letter is mailed to each affected permit holder by the Permit Processing Section.
- G) All issues identified within the 30-day comment period are addressed as specified above.
- H) Revised permits are issued (with 30-day appeal rights).

3) Annual Permit Review – Permits that are not reviewed each year as part of the Compliance Division inspection process are scanned to ensure that they reflect current requirements and are enforceable. This review is performed by the Engineering Division with input, on an as needed basis, from the Monitoring and Technical Services Division and Permit Processing Sections. The Compliance Division will initiate this review,

Engineering Division Manual of Procedures

generally at the beginning of each fiscal year, by the preparation of a list of all permits that were not reviewed as part of an annual compliance inspection.

4) Review of Reactivated Permits – The District has a program that allows permits to be placed in inactive status for indefinite periods. These permits are handled differently in the existing database system and they will not be reviewed annually using the procedures specified above. Therefore, prior to reactivation of any permit in inactive status, these permits must be reviewed by the Engineering Division to ensure that they reflect current requirements, are clear, enforceable and consistent. This review will be initiated by the Permit Processing Section, upon a request to reactivate a permit, and must be completed prior to reactivation of the permit.

1.8 Notice Procedure for Permit Condition Changes (Tom Weeks, April 2008)

Prior to changing conditions on any permit, it is necessary to inform the applicant of the proposed change, in writing, and provide them with an opportunity to comment. This is important to ensure that permittees are aware of changes to their permits, understand the changes and are able to comply. The following procedures shall be used:

Permits with No Open Application - If the District determines that a condition or conditions on an existing permit requires correction or modification, the permit holder must be notified in writing of the proposed change at least 30 days prior to the condition change.

The written notice must:

Summarize the proposed changes.

Explain the reason for the proposed changes.

Provide a draft copy of the revised P/O or revised conditions.

Allow 30-days for the permit holder to provide written comments.

List at least one District point of contact and provide phone numbers for questions concerning the proposed changes.

State that the permittee will have the right to appeal any revised condition to the Hearing Board.

All comments received during the comment period must be considered and addressed.

Any significant comments must be discussed with senior staff and the Chief of Compliance and/or the Chief of Engineering as necessary. The District must respond, in writing, to all significant comments prior to issuance of the revised Permit to Operate. Prior to a decision to revise a permit despite objections of the permit holder, the Chief of Engineering and/or the Chief of Compliance must be consulted. In this instance, the permit holder should be advised of their appeal rights under Rule 25(b).

The permit engineer must thoroughly document the condition change process in the permit file. The Compliance Division should be consulted as necessary to ensure that the

Engineering Division Manual of Procedures

changes do not result in subsequent compliance issues. This can be accomplished through the standard BEC review process.

If condition changes are industry-wide and a representative of the affected industry requests that a workshop be held, the Committee should discuss the request with the appropriate Chief prior to taking any action on the permit revision.

Permits with an Open Application - If the District determines that an existing condition or conditions on an existing permit for which there is an open application requires correction or modification, the permit holder must be informed of the proposed change at least 15 days prior to issuance of a revised A/C. This can be done by underlining or otherwise highlighting the proposed changes on a draft A/C.

The draft A/C must:

Clearly identify any proposed change that is not associated with the application for modification.

Explain the reason for the proposed changes.

Allow at least 15 days for the permit holder to provide written comments.

The engineer must consider all comments received during the comment period. Any significant comments must be discussed with the senior staff and the Chief of Compliance and/or the Chief of Engineering as necessary. The permit engineer must respond to significant comments in writing prior to issuance of the revised Permit to Operate. Prior to a decision to revise a permit despite objections of the permit holder, the Chief of Engineering must be consulted. In this instance, the permit holder should be advised of their appeal rights under Rule 25(b).

The permit engineer must thoroughly document the condition change process in the permit file. The Compliance Division should be consulted as necessary to ensure that the changes do not result in subsequent compliance issues. This can be accomplished through the standard BEC review process.

Minor Condition Changes or Changes that Relax Permit Requirements - If the District determines that a condition or conditions on an existing permit requires correction or modification, and that correction or modification is a minor change or results in a relaxation of the permit requirements, the permit holder must be informed in writing of the proposed change at least 15 days prior to issuance of a revised permit.

The written notice must:

Summarize the proposed changes.

Explain the reason for the proposed changes.

List at least one District point of contact and provide phone numbers for questions concerning the proposed changes.

Engineering Division Manual of Procedures

State that the permittee will have the right to appeal any revised condition to the Hearing Board.

Any issues raised by the permittee must be discussed with the senior staff and the Chief of Compliance and/or the Chief of Engineering as necessary.

The permit engineer must thoroughly document the condition change process in the permit file. The Compliance Division should be consulted as necessary to ensure that the changes do not result in subsequent compliance issues. This can be accomplished through the standard BEC review process.

1.9 Customer Service for Phone and Walk-In Customers (Tom Weeks, May, 2010, Revised March 2013)

Phone Calls - The designated Engineering Technician (ET) is the primary point of contact for phone calls. If the ET is out of the office but expected to be back in within one working day, customers will be asked to leave a voice mail message. If the ET is unavailable for more than one working day, the receptionist will route the call to the duty desk engineer in the appropriate section.

Walk-In Customers - The designated Engineering Technician (ET) is the primary point of contact for walk-in customers. If the ET is on a break or at lunch, the receptionist will leave a message with the ET and inform the customer of when they can expect service (a maximum of 30 minutes). If the ET is unavailable or out of the office for more than 30 minutes, the receptionist will route the call to the duty desk engineer in the appropriate section. It is not necessary for an engineer to sign off on applications that are received at the front desk. Permit Processing staff may ask an engineer to review an application if there are questions.

Out of Office Procedures - If any staff will be out of the office for more than one working day they must place a message on their voicemail and include a number to call if the caller needs immediate assistance. The ET and the duty staff must always notify their supervisor and the receptionist when they are away from their desks. In cases where the ET and the duty person are both out of the office, the receptionist will contact the next person on the duty roster.

1.10 Expectations for engineers working on permit applications

Engineers provide a vital role to the District by reviewing equipment for compliance with District Rules and Regulations and issuing permits to authorize construction and operation of equipment. To accomplish this important task, engineers are responsible for the following:

- Engineers should be familiar with the overall permit application review process including all policies and procedures and steps necessary to issue permits including properly utilizing BCMS

Engineering Division Manual of Procedures

- Being familiar with regulatory deadlines for reviewing and approving projects and ensuring these deadlines are met except in allowable situations as determined by Engineering management and listed in these policies and procedures
- Reviewing technical information submitted by permit applicants and determining if sufficient information has been received to evaluate an application.
- Contacting permit applicants to inform them of important information regarding application review including requesting additional technical data, communicating anticipated schedule and other important deadlines.
- Being familiar with rules and regulations that are applicable to the equipment you are reviewing. This includes keeping up to date on revised regulations/requirements and being able to read regulatory language and determine applicability of requirements to equipment
- Being familiar with emission calculation methodology for equipment you are reviewing including using emission factors, mass balances or concentration-based calculations as appropriate. Engineers will need to apply engineering judgment and make appropriate assumptions and document calculations as appropriate.
- Preparing complete and accurate Engineering Evaluation reports including all required sections. Engineers are expected to utilize available templates and formats as requested by their Supervisor and employ good technical writing techniques
- Creating permit conditions for Authorities to Construct and Permits to Operate that are clear, enforceable and ensure that all applicable requirements are listed on the permit
- Engineers are expected to accurately track their time spent reviewing applications according to all policies for labor tracking and fiscal management. Engineers should actively monitor funds available for applications and request invoices for additional fees in a timely manner.
- Conducting engineering inspections to ensure that equipment meets regulatory requirements and documenting these inspections including recording data or taking photos as necessary.
- Preparing permits and permit conditions in BCMS including correctly utilizing condition sets (CONs)
- Documenting all steps in the review process and ensuring that all documents are uploaded to the proper place in BCMS/Documentum at the appropriate time. Documents should be uploaded as soon as possible after they are received or finalized since this ensures everyone at the District has access to up-to-date and accurate information.
- Completing all required data fields in BCMS prior to submitting applications for approval
- Assisting applicants by answering questions about the permit process and providing estimates of application fees in accordance with Rule 40

Engineering Division Manual of Procedures

2. Permit Application Processing - General

2.1 Early Assistance/Pre-Application Procedures (Mike Lake, August 13, 1993)

This procedure is to be used when assistance is requested by a potential permit applicant prior to application submittal. It was developed collaboratively with industry representatives and the APCD. This "early assistance" procedure is only a general guideline to enhance the current permit processing system. Implementation of this procedure does not constitute any change in District rules and/or regulations.

A. Complex Systems

1. The applicant will phone and inform the District of his/her upcoming application. This call should be made directly to the appropriate senior engineer whose engineering group would typically handle this type of application (i.e., chemical, mechanical, gasoline vapor control, etc.). In general, the same engineer will be assigned to follow the application throughout the process.
2. The applicant will make an appointment with the assigned engineer and they will hold a Pre-Application meeting (in person) to discuss all aspects of the application. At a minimum, this meeting should accomplish the following:
 - a. The applicant will bring a complete description of the equipment/process to be applied for. This will include: identification of all air contaminant emission points, a drawing showing the facility property lines, equipment location and nearby streets and developed areas; and, estimates of all air contaminant emissions including toxic air contaminants (maximum pounds/hour, maximum pounds/day, and maximum pounds/year).
 - b. The District will issue a comprehensive checklist that will completely outline the specific information required to deem the application complete. The applicant will provide this information when the application is formally submitted. New Source Review rules, Air Quality Analysis, Best Available Control Technology, Risk Assessment, and Source Testing requirements should also be noted on this checklist, if applicable. If an Air Quality Analysis or Risk Assessment will be required, and the submittal of a protocol on how such work will be performed is necessary, such requirements will be explained at this time.
 - c. The applicant will advise the District of any time sensitivities associated with the processing of the application (e.g., construction deadlines,

Engineering Division Manual of Procedures

compliance schedule mandated by a District rule or Hearing Board order, etc.).

- d. The District will explain the processing steps the application will follow along with a noted timetable. The District will endeavor to process the application within any reasonable timeframe requested by the applicant. However, if the application cannot be processed within such timeframe and this will cause the applicant to be in non-compliance with a District rule or Hearing Board order, the District will advise the applicant that a petition should be filed with the Hearing Board to address the non-compliance issue or District Compliance action may result.
 - e. The specific items on the checklist will be agreed upon and initialed by both parties.
 - f. The District will present to the applicant all expected permit processing costs. If processing costs are expected to exceed the amounts initially submitted, the District will immediately notify the applicant by phone with a letter and detailed accounting statement to follow in the mail.
3. If Air Quality Analysis and/or Health Risk Assessment protocols are required, they should be submitted at least 30 days prior to application submittal. These protocols will be reviewed within 30 days and the applicant will be advised, in writing, of any changes necessary. The applicant will submit the Air Quality Analysis and/or Health Risk Assessment at the time of application submittal. If an application is submitted without a required Air Quality Analysis and/or Health Risk Assessment, it will be deemed incomplete until these documents are provided and reviewed for completeness.
 4. The application is submitted to the District with appropriate fees and an attached note identifying who the assigned District engineer is. After initial District review, most applications should be found to contain all of the required information and be deemed complete retroactive to the date of submittal, depending upon complexity. (If the application is still lacking information, the District has 30 days to request more data. If no request is made, the application will automatically be deemed complete on the 31st day). If a health risk assessment was not required with application submittal, but a District screening risk assessment indicates that a formal Health Risk Assessment, including a modeling protocol, will be required, the applicant will be advised of this within the 30 days after application submittal. If required, a Health Risk Assessment protocol will be reviewed within 30 days.
 5. When the application is deemed complete, the 180-day clock noted in District Rule 18 will automatically start. If upon review of the application package it is determined that the application was complete when submitted, the submittal date will start the initial 180 day clock.

Engineering Division Manual of Procedures

6. The Authority to Construct (A/C) will be issued no later than 180 days from the time the application is deemed complete, except for mutually agreed upon extensions as provided for in Rule 18. Priority for permit processing will be given to all applicants who follow this procedure. The A/C conditions should include, at a minimum, all conditions that will subsequently be established on the Start-Up Authorization/Permit to Operate, except for conditions that are established as a result of source testing or inspection. If A/C conditions are non-routine, the District will provide a copy to the applicant for review at least 10 days prior to A/C issuance. The applicant will advise the District of any issues. If emissions source testing is necessary, the applicant will be required to submit, prior to completing construction, a protocol describing how that testing will be done. Source testing protocols will be reviewed by the District within 30 days of submittal.

Note: It is recommended that any abuses of the Rule 18 time limits or threats of application denial if processing deadlines are not extended, be reported to the Chief of Engineering and/or the Engineering Deputy Director. All permit denials must be approved by the Deputy Director.

7. If the applicant makes substantive changes to the application during the above evaluation period, the 30 day clock for completeness and 180 day clock for District action, as appropriate, will be restarted.
8. When construction of the project is complete and all A/C conditions have been complied with (excluding conditions requiring emissions source testing), the applicant will notify the assigned District engineer and establish a date for the field evaluation/inspection. In most cases the District engineer should perform this inspection within 15 days following the notification. Upon successful completion of this field evaluation, a Start-up Authorization (S/A) should be immediately issued, if practicable. The applicant will advise the District of any issues associated with the S/A. Any required emissions source testing or other analyses, monitoring or emissions control measures required by the A/C should be accomplished within the time frames specified in the A/C but in no case no later than 120 days after initial S/A issuance. Reports of source testing or monitoring results, if required, will be reviewed within 30 days of submittal. Within 180 days from the initial S/A issuance date, a hard copy of the final Permit to Operate should follow in the mail if all conditions of the A/C have been satisfied and compliance with applicable District rules has been demonstrated. If final Permit to Operate conditions differ substantially from S/A conditions, the District will provide a copy to the applicant for review at least 10 days prior to P/O issuance. The applicant will advise the District of any issues.

Note: Application submittals will be required to include the following information, along with all noted specifics from the pre-application meeting:

Engineering Division Manual of Procedures

- Estimated emissions along with the calculation methodology.
- General MSDS's for the process to be evaluated.
- Maximum process throughput.
- General System Description (flow diagram).
- Hours/Number of days of equipment operation.
- A definition of what "BACT" is for the process requiring the permit, if applicable.
- A drawing showing the location of the equipment within the facility, the boundaries of the facility and any nearby public streets, commercial, industrial, or residential areas or areas accessible to the public.
- Air Quality Analysis and/or Health Risk Assessment, if applicable.

Note: If the final A/C, S/A or P/O conditions are in dispute and cannot be resolved with the section Senior engineer, contact should be made with the Chief of Engineering. If agreement still cannot be achieved, contact should be made with the Engineering Deputy Director. If agreement still cannot be achieved, the applicant may file a petition with the APCD Hearing Board to appeal any A/C or P/O conditions considered unacceptable. This petition must be filed within 10 days from the recorded A/C or P/O issuance date (District Rule 25).

a. Off the Shelf Equipment

The District will develop and utilize a standard engineering evaluation and associated "boilerplate" permit for equipment that is used by a number of sources for similar purposes. Using these "boilerplate" evaluations and permits, applications for such equipment can be quickly processed upon evaluation of certain site-specific criteria and New Source Review requirements. Industry will encourage manufacturers of such equipment to apply to the District, as appropriate, for certification of this equipment.

In addition, an on-going Permit Improvement Working Group has been established that consists of 3 members from the District and at least 3 members from industry. The Working Group's function is to collaborate and make recommendations to the District on the following matters:

- Development of the comprehensive checklists that are provided to applicants at the pre-application meeting.
- Revisions of this procedure that will result in continuous improvement of the permit processing system.
- Development of a check-off list to help sources determine what toxic air contaminants exist at a facility.

Engineering Division Manual of Procedures

- Development of permit processing and application filing instructions to assist applicants in preparing complete permit applications.
 - Categorizing permit applications for purposes of permit streamlining and focusing permitting efforts.
 - Development of Best Available Control Technology guidance for permit applicants.
9. Accounts which are created to track time charges for pre-application consultation work or special projects will be called “Application Accounts.” The project engineer must complete the A-A request form by providing the basic necessary information, the site ID number, the A-A type, the activity labor code and the appropriate fee schedule.
- A. The three different “Application Account” types are:
1. Type Q A-A should be created when the work to be performed will generate a new or revised permit. It is to be created when the project engineer intends to spend more than two hours working with an application prior to the submittal.
 2. Type J A-A should be created when the work to be performed will not generate a permit but is permit related. This should be created when the project engineer is assigned to work on a project that will not result in a permit being issued.
 3. Type F A-A should be created when the work to be performed will not generate a permit but is not permit related. This should be created when the project engineer is assigned to work on a project that will not result in a permit being issued.

2.2 CEQA

2.2.1 Permit Actions Involving CEQA (Mike Lake, January 24, 1995)

Recently, there have been several projects requiring District permits that have also involved California Environmental Quality Act (CEQA) review & most have involved other agencies as the lead agencies and the District's role has been as a responsible agency. The significance of whether a project the District is evaluating for permits is also subject to CEQA is that state law prohibits the District from issuing a permit (includes Authority to Construct, Startup Authorization, modified Permit to Operate or new Permit to Operate) if the project is subject to CEQA until the lead agency has completed the CEQA review for the project and certified the findings. Typically, the CEQA review and findings will be in the form of a Negative Declaration, Mitigated Negative Declaration or Environmental Impact Report.

The vast majority of projects we evaluate are exempt from CEQA or have already undergone a CEQA review. However, we need to be aware that occasionally, projects

Engineering Division Manual of Procedures

will come to us for permits before or during a CEQA review. If a project engineer suspects that a project application is for all or a portion of a project that is subject to CEQA review, the engineer should immediately advise his/her Senior engineer and should not issue a permit until further advised (the application evaluation can and should proceed). The Senior Engineer and Engineering Division Chief will look into the matter and determine if the District's permit process will be impacted and how, then advise the project engineer how to proceed. If a CEQA process is involved and District action will be delayed, the District will advise the applicant that this is the case and that in the interim, the application will be considered incomplete until CEQA requirements are satisfied.

Because CEQA will not be an issue with the majority of permits we process, it is not asked that engineers query every applicant or check CEQA applicability on every project. Rather, it is requested that engineers be aware of the issue, recognize the following indicators, and bring suspect applicants to the attention of their Senior engineer. The following suggests a project that may likely be subject to CEQA:

The project also requires, but has not yet received, permits from a state agency such as the Regional Water Quality Control Board, the Coastal Commission, the Integrated Waste Management Board, the Energy Commission and/or the Public Utilities Commission.

The project requires, but has not yet received, a conditional use permit, major use permit, new or community plan amendment or zoning change/variance from a Environmental Review Board or Board of Supervisors.

The project needs approval from, is under consideration by, or is to be heard by a City or County commission or board.

An Initial Study, Negative Declaration or EIR is needed or is being prepared or the District is asked to comment on or review documents related to one of these.

The project is likely to be very controversial and/or has raised considerable public concern or media coverage.

Projects on military bases typically do not involve CEQA issues.

2.2.2 Question and Answer Document Discussing CEQA (Mike Lake, January 26, 1995)

The following is an excerpt of a Question and Answer document discussing CEQA. It should answer some of the more basic questions regarding CEQA that may have arisen.

A. Roles: Who does what?

What types of agencies are involved?

A: CEQA review usually requires the participation of local planning agencies, air pollution control districts, and state agencies. In some cases, agencies of the federal government participate in CEQA reviews.

Engineering Division Manual of Procedures

Under CEQA, these agencies become lead agencies, responsible agencies, or commenting/interested agencies.

What is a lead agency?

A: Lead agency is the public agency that has the principal responsibility for carrying out or approving a project. Under CEQA, the lead agency is responsible for determining whether the project will have a significant effect on the environment. The lead agency also has the authority to require changes in any or all activities involved in the project in order to lessen or avoid significant effects on the environment. The lead agency decides whether an Environmental Impact Report (EIR) or Negative Declaration will be required for the project and will cause the document to be prepared.

3) How do we determine which agency is the lead agency?

A: The lead agency will normally be the agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose such as in air pollution control district or an agency that provides a public service or public utility to the project.

Where two or more public agencies will be involved with a project, the determination of which agency will be the lead agency shall be governed by the following criteria:

If the project will be carried out by a public agency, that agency shall be the lead agency even if the project would be located within the jurisdiction of another public agency.

If the project is to be carried out by a non-governmental person or entity, the lead agency shall be the public agency with the greatest responsibility for supervising or approving the project as a whole.

When more than one public agency is equally qualified to be the lead agency, the lead agency shall be the first agency to act on the project, or the participating agencies may by agreement designate a lead agency.

If there is a dispute over which of several agencies should be the lead agency for a project, the disputing agencies should consult with each other in an effort to resolve the dispute prior to submitting it to OPR. If an agreement cannot be reached, any public agency, or the applicant if a private project is involved, may submit the dispute to OPR for resolution.

4) What is a responsible agency?

A: The other agencies with discretionary permitting authority for a project, besides the lead agency, are CEQA-responsible agencies. A responsible agency may require, through its own permitting procedures, changes in a

Engineering Division Manual of Procedures

project to lessen or avoid the effects, either direct or indirect, of only that part of the project which the responsible agency will be called on to approve.

What is a commenting/interested agency?

Agencies with no permitting authority for a project may still act as agencies which may participate in the evaluation of the environmental impacts of a project. Generally, a commenting/interested agency has expertise in or oversight responsibility for specific geographic regions or environmental resources.

6) How do local planning agencies participate?

Cities and counties have discretionary approval over land use regulation by way of general plan amendments, specific area plans, zoning ordinance amendments, or special or conditional use permits. Each city and county has a planning agency, an appointed planning commission and an elected city council or county board of supervisors.

The local planning agencies generally have the principal responsibility for carrying out or approving a project. A planning agency frequently is the CEQA lead agency for a project.

7) How do air pollution control districts participate?

A district may be a lead agency, a responsible agency, or a commenting/interested agency.

A district may be the lead agency when considering the adoption of an air pollution control measure or a hearing board's decision regarding a variance. The district may also be the lead agency for the situation when a stationary source is undergoing a significant modification, but no land use permit change is necessary. As lead agency, the district is responsible for the preparation of CEQA environmental documents. Figure 1-1 presents a flow chart describing the steps a district must follow when implementing CEQA as a lead agency.

A district will generally be a responsible agency for a project that is a direct source of emissions. In a situation such as this, the project may need a permit from the district. As a responsible agency, the district's expertise is such that its task is to evaluate the air quality impacts of the project. When participating as a responsible agency, the district's decision making must consider the lead agency's findings regarding air quality impacts. The district, in fact, cannot issue a permit until the lead agency's environmental documents have been completed.

While districts have the legal authority to regulate indirect sources and require that they receive permits, no district has yet enacted an indirect source review rule. The enactment of the California Clean Air Act is expected to change this. If the districts adopt indirect source review rules, they would comment as a responsible agency. Until that time, a

Engineering Division Manual of Procedures

district is considered a commenting/interested agency for indirect sources. As a commenting/interested agency, the district should work with the lead agency to ensure that the air quality impacts of projects which may be indirect sources of emissions are minimized or mitigated.

8) How do state agencies participate?

State agencies regulate the private use of state land and resources and certain activities of statewide significance. Some state agencies have oversight responsibilities over local agencies. The state Air Resources Board (ARS) has primary regulatory responsibility over mobile source emissions and oversight responsibility over stationary sources. A summary description of State agencies' areas of responsibilities is contained in Appendix B.

Certain state agencies may regularly act as lead agencies; others have roles as responsible or commenting/interested agencies. In addition, the Governor's Office of Planning and Research (OPR) operates the State Clearinghouse to facilitate and coordinate the review of CEQA projects subject to state agency authority.

9) Do federal agencies participate in CEQA reviews?

Federal agencies are not public agencies as defined by CEQA. The National Environmental Policy Act (NEPA) of 1969 applies to projects which are carried out, financed, or approved in whole or in part by federal agencies (42 U.S.C.A. 4321-4367; NEPA Regulations, C.F.R. Parts 1600-1508). NEPA authorized a broad policy requiring consideration of environmental consequences for most federal activities. NEPA requires each federal agency to prepare an Environmental Impact Statement (EIS) on projects that may significantly affect the quality of the human environment. Therefore, a project located in California may have to comply with both CEQA and NEPA.

State and local agencies can use an EPA Environmental Impact Statement (EIS) in lieu of a CEQA Environmental Impact Report (EIR) if the EIS contains the same provisions as the EIR would need to contain and is prepared before the EIR. A lead agency may prepare a joint EIR/EIS if the federal agency cannot complete it in time.

If a joint EIR/EIS is used, federal law requires that the appropriate federal agency participate in the preparation of the document.

10) Documents: Use and Content

A checklist of CEQA documents. As part of a CEQA review, these documents, described in detail later in this section, may be used:

Notice of Exemption
Initial Study
Negative Declaration

Engineering Division Manual of Procedures

Notice of Determination
Notice of Preparation
Notice of Completion
Environmental Impact Report

b. What is the District's role in the preparation of these documents?

Environmental documents required by CEQA are the responsibility of the lead agency. The lead agency may prepare the documents or cause them to be prepared by the project applicant. In either case, the lead agency is responsible for the complete document.

A District becomes involved in the preparation of environmental documents in these instances:

When the District is a lead agency.

When the lead agency consults with the district in the district's role as responsible or commenting/interested agency.

In either instance, the District should ensure that the documents contain relevant data that address air quality issues.

2.2.3 Process Outline for Issuing a Negative Declaration (December 4, 1995)

This document has been drafted based on the CEQA process for adoption of District Rule 67.11, where a Negative Declaration was issued. Changes to the process may be required if CEQA is triggered by a Permit action. Additional information may be obtained from the CEQA guidelines' issued by the Governor's Office of Planning and Research (OPR), which is available in the District library. The Section (§) references listed in parenthesis are from that CEQA guideline document.

A. Define the project with a title that reflects the action (i.e., Adoption of Rule 67.11 -- Wood Coating Operations)

B. Determine if the project is categorically exempt from CEQA requirements. (§ 15061)

1) If the project is categorically exempt:

- The basis should be documented within the project file for reference
- The standard categorically exempt from CEQA language should be used in the board letter (In both the findings & background information sections)
- A Notice of Exemption should be prepared for the Clerk of the Board to file w/ OPR.

2) If the project is not categorically exempt:

- An Initial Study (IS) is required to determine if:

Engineering Division Manual of Procedures

- A Negative Declaration (ND) should be issued, or
 - An Environmental Impact Report (EIR) is required. (See steps II.5(c)4, II.5(c)(5), and II.5(c)(6)).
- C. Consult with ARSD regarding the effects of the proposed project on the SIP (i.e. 15% rate of progress, this an internal action not required by CEQA)
- D. Consult with ARB and any other interested "responsible" agencies for their input, re: should an Initial Study (IS) and Negative Declaration (ND) or Environmental Impact Report (EIR) be prepared? (§ 15063(g))
- ☐ Current ARB contact for CEQA is Michael Tollstrup, (916) 323-8473.
- E. Determine if the project "may have a significant effect on the environment. (This is a preliminary decision which will be supported by further work such as an IS or EIR)
- 1) If the project will likely not cause any "significant effect" on the environment, then proceed with an Initial Study and Negative Declaration. (§ 15070 et seq.)
 - 2) If the project is likely to result in a "significant effect" on the environment, then an Initial Study is not required, instead work on the EIR will be the first step. (§ 15060(c))
- NOTE—If the determination of what constitutes a significant effect' on the environment relies solely on the District's judgment or there is public concern about the project, an EIR should be performed.
- F. Prepare Initial Study. The IS provides documentation of the factual basis for the ND finding that a project will not have a significant effect on the environment. The document must include the following, (§ 15063) (A template IS, as described below, is available on disk):
- Project name, applicant and location
 - Project Description (This may include an explanation of any effects and a determination of the significance of these effects.)
 - Checklist to identify environmental effects
 - Discussion of ways to mitigate significant effects identified, if any
 - Determination of consistency with existing zoning, plans including general and specific plans, and other applicable land use controls
 - Determination of de minimis impact finding for Department of Fish & Game
 - Determination of environmental document (This is the 'finding' of the IS -- see Step 7 for details)
 - Name of person who prepared Initial Study (Different than responsible person who signs the IS)

Engineering Division Manual of Procedures

- G. Formally determine if the project will result in a significant effect on the environment.
- The determination should be based on the information provided in the Initial Study. (§ 15064)
 - The determination is used to justify the issuance of a Negative Declaration (§ 15070) or the basis for requiring an EIR.
 - Record the final determination in the "determination of environmental document" section of the IS.

Prepare a proposed Negative Declaration. The document must include the following: (§ 15071)

- Date of Negative Declaration
 - Project name, applicant and location
 - Project description
 - Proposed finding that project will not have a significant effect on environment
 - Copy of Initial Study to support finding
 - Listing of mitigation measures, if any, included in project to avoid potentially significant effects
 - Statement that "This action becomes final upon approval by the APCB."
- I. Prepare Notice of Intent to issue Negative Declaration for publication in newspaper. (§ 15072, 15073)
- The notice requires a 30 day public review period (including other government agencies)
 - Notice must be submitted to Public Info for publishing, allow 5-7 additional days

NOTE--the public notice period may be shortened to 21 days with OPR approval. (Request form is available on disk)

- J. Notify OPR of CEQA actions taken by District. (§ 15073)
- Current OPR contact for CEQA is Scott Morgan, Governor's Office of Planning and Research, 1400 Tenth Street, Sacramento CA 95814, (916) 445-0613.
 - Send 15 copies of Initial Study and proposed Negative Declaration.
 - Send Notice of Completion form. (use the actual "supplementary document 'A' form, from the CEQA Guidelines, Revised 10/29/98).
 - Include one additional packet with cover letter.
 - OPR will assign a State Clearing House (SCH) number to the project.
- K. Notify ARB of CEQA actions taken by District.
- Current ARB contact for CEQA is: Michael Tollstrup, Air Resources Board, Stationary Source Division, PO Box 2815, Sacramento CA 95812, (916) 323-8473.

Engineering Division Manual of Procedures

- Send copy of Initial Study and proposed Negative Declaration with cover letter
- L. Present intent to issue ND to the advisory committee if they will be making a recommendation to the Board on the project. They must consider the proposed ND before making their recommendation to the Board. (§ 15074(a))
- M. At the end of the public comment period: (§ 15074)
 - Respond to any public comments (*Format has not yet been determined*).
- N. Include the following CEQA information in the Board letter:
 - A finding in the board letter which states that the Board has considered the ND and any comments prior to approving the project. (§ 15074(b))
(Approval of the ND and approval of the project may be incorporated into the same letter, if the Board must approve both.)
 - A finding in the board letter that the ND is exempt from the \$850 fish & game fee. (Form is available on disk)
 - A summary of the District's action regarding CEQA requirements (A copy of the Rule 67. 11 board letter is available as a reference.)
- O. Complete Notice of Determination form with the following information: (§ 15075)
 - Project name, applicant and location.
 - Project description.
 - Date on which the agency approved the project.
 - Must include the SCH #, which was assigned by OPR.
 - Determination by agency that the project will not have significant effect on environment Statement that a Negative Declaration has been prepared pursuant to CEQA.
 - Address where a copy of the Negative Declaration may be examined.
 - This document must be included in the Board package.
- P. Approval of project (i.e., board adopts rule).
- Q. Notice of Determination is filed with County Clerk by the Clerk of the Board (§ 15075(d) & (e))
 - The Clerk files Notice of Determination with OPR is required.
 - The Clerk files the finding of fee exemption document with Fish & Game.

Acronyms:

APCB	Air Pollution Control Board
ARSD	Air Resources and Strategy Development
CEQA	California Environmental Quality Act
EIR	Environmental Impact Report is Initial Study
ND	Negative Declaration
OPR	Office of Planning and Research
SCH	State Clearing House

Engineering Division Manual of Procedures

2.3 Application Schedule Management

2.3.1 Rule 18 – AB884 (Mike Lake, March 19, 1992)

Concerns have been raised regarding adherence to Rule 18/AB884 permit processing deadlines. There appear to be two primary issues and one secondary issue:

- A. Not requesting additional information or determining an application is complete within 30 days of receipt of the application.
 - B. Requesting additional information after the initial 30-day deadline and/or coercing an applicant to agree to processing time extensions by threatening denial of the application.
 - C. Not canceling applications when requested information is not provided.
- 1) Regarding issue #1

District Rule 18(a) requires the District to determine whether an application for A/C, P/O or banking is complete or incomplete, and to so notify the applicant, within 30 days of receipt of the application. If the application is determined to be incomplete, the needed additional information must be specified in the notice of incompleteness. The purpose is to ensure timely review and early identification of deficiencies in the application information. It is the intent of Rule 18, and District policy, that such notification be in writing. However, if only minor information is needed for completeness, it can be requested by phone but must be documented in the file. If the information is not provided before the end of the initial 30-day period, it must be requested in writing.

It is important that the request for additional information be made within the allotted 30-days and that the additional information requested include all information we may need. The request for additional information needs to be thorough and identify the specific information needed to complete the application. Once the applicant has provided all of the information requested during the initial 30-day period, the application must be found complete and the applicant so notified. This determination is to be made within 30 days of receiving the additional information.

The maximum 180 days allowed for application processing begins on the date the application is determined to be complete. This is 30 days after the date when all additional information required in the first 30 days has been provided or 30 days after application filing if the District fails to request additional information in that 30 days.

Engineering Division Manual of Procedures

Once the application is determined complete, whether by District action or inaction, the District can request amplification or clarification of information already provided by the applicant, or request additional information. However, such requests do not stop the 180-day calendar for action on the application. If additional information is needed in order to determine compliance during this period, it should be requested and documented, but again such requests do not stop the 180-day calendar. Such requests should not identify applications as incomplete.

As soon as possible after applications are assigned, but not later than two weeks after District receipt of an application, project engineers should notify their Senior Engineer if they will not be able to review an application for completeness and request additional information within the initial 30-days. The Senior Engineers will work with engineers to meet the 30-day requirement.

2) Regarding issue #2

District Rule 18(b) requires the District to act on a completed application within 90 days, if possible, or within a maximum of 180 days. Rule 18 also allows an applicant to deem an application denied if not acted upon within the first 90 days. With the concurrence of the applicant, the 180-day evaluation period may be extended an additional 90 days. If no action is taken within the 180 days or 270 days if extended, the application shall be deemed approved. As noted above, amplification, clarification or additions to application information may be requested during this period but such requests do not delay the Rule 18 timelines for action. By the memo of 1/24/90 (II.1 (d)(4)), the procedures for use of the 90 day extensions were specified. Briefly, a 90-day extension of the 180-day period should be the exception and must be approved, in writing, by your Senior Engineer, with documentation of the reasons for the extension in the permit file. Senior Engineers will advise the Chief of any extensions. In the unlikely event that 270 days is not sufficient to complete an evaluation, any further extension beyond 90 days must be approved by the Chief of Engineering or Deputy Director.

Adherence to this procedure is mandatory. Engineers who do not comply with this procedure risk disciplinary action. If you have any applications that are approaching or have exceeded the 180-day evaluation period, it is strongly suggested that you discuss them with your Senior Engineer as soon as possible.

It has also come to attention that in some cases applicants are being threatened with denial of their applications unless they agree to extensions of the evaluation period and provide additional information. District Rule 20 places the burden of demonstrating compliance on the applicant and authorizes District denial of an application when a compliance demonstration is not made. However, such denials may not stand if they are based on the District's failure to request additional information in a timely manner (especially if the applicant provided a completed application supplemental information form).

Engineering Division Manual of Procedures

Such threats are inappropriate, are certainly not consistent with the intent of Rule 18 and do not contribute to a cooperative permitting effort. If a project engineer has an application that lacks sufficient information to demonstrate compliance, the engineer has not requested the additional information needed within the allotted 30 days and the 180 day deadline is approaching, the engineer should request the applicant to provide the information as soon as possible. The engineer should explain the requirements of Rule 20 in a positive sense (i.e. the additional information is needed to determine compliance and issue a permit) and advise the Senior Engineer. Threats of permit denial should not be used.

The best remedy to this problem is to request needed additional information within the initial 30 days, and to complete evaluation of the completed application as soon as possible (i.e. within 90 days) but no later than the 180 days allowed by Rule 18.

3) Regarding issue #3

District Rule 17(c) provides that an application shall be cancelled if the District requests needed additional information and the applicant fails to furnish the information within six months. This means that the applicant must provide all requested information within the six months, not provide some and then be given an additional six months. If an applicant submits some but not all of the requested information, the applicant is to be notified in writing of any deficiencies within 30 days.

Engineering staff have been reluctant to cancel applications, anticipating that the company will immediately re-file and additional paperwork will be generated. However, this reluctance to cancel does, to some degree, add to the backlog and permit delays. Accordingly, Rule 17(c) is to be followed by engineers. If there is an exceptional case, such as a complex project requiring risk assessment or emission offsets, a longer period for providing the information may be allowed, with the written approval of your Senior Engineer. Such longer period must be specified in the letter requesting the information, with the Senior Engineer's initials approving the draft.

Current extensions should be honored but the applicant advised there will be no further extensions. When an application is cancelled for failure to provide requested information, such cancellations must be in writing and document the reasons for cancellation. Any subsequent application should be placed at the back of your applications pending 30-day review but processed consistent with Rule 18 timeliness.

From the above, it should be clear that the initial review of applications for completeness, and identification of needed additional information within the prescribed 30 days is critical. These actions set the tone for adherence to Rule 18 and District policy for the remainder of the evaluation period. Accordingly, these Rule 18 requirements must be followed. It should also be clear that all requests for

Engineering Division Manual of Procedures

information, whether in writing, by phone or in person must be documented in the application evaluation file. Further, any anticipated deviations from Rule 18 requirements must be discussed with the Senior Engineer prior to any action dates.

D. Rule 18 Time Extensions (January 24, 1990)

It has come to attention that Engineering staff are extending the 180 day evaluation period allowed by Rule 18 by multiple 90 day increments with the concurrence of the applicant. While County Counsel has opined that an applicant can waive their rights to timely action on their application, thus foregoing the limits of Rule 18, this practice is not in keeping with District objectives for action on applications and should not be applied except in extraordinary cases and with the approval of the Senior Engineer, Chief of Engineering or Deputy Director, as provided below. The following Engineering policy will apply to Rule 18 time extensions for all new applications and existing applications which are currently under extensions or may need extensions in the future:

- 1) Except as provided in #2 and #3 below, actions on applications shall be accomplished within 90 days, if possible, but not more than 180 days as prescribed by Rule 18.
- 2) If unusual circumstances (e.g. source testing/report delays, delays in providing additional information beyond the control of the applicant, late requests for additional information, etc.) warrant an extension of the 180 day period, that extension must be approved by your Senior Engineer, the applicant must provide prior written concurrence to the extension, and the extension shall not exceed 90 days. The reasons for the extension must be documented in a memo to the file, signed by the project engineer and initiated by the Senior Engineer. The Senior Engineer may discuss project specific circumstances with the Chief
- 3) Extensions beyond the 270 days provided for in #1 and #2 above will only be allowed in extraordinary cases and must be approved by the Chief of Engineering or, in my absence, the Deputy Director.

Currently granted extensions shall remain in effect. However, the project engineer is to document the reasons for the extension in the application file and bring them to the attention of her or his Senior Engineer. Applications for which the initial 90 day extension has passed, or will pass shortly without final action on the application, shall be brought to my attention

2.3.2 Excessive Time for Processing Applications (May 18, 1983)

Applications will be processed in a timely manner. All activity related to application processing will be documented. When an individual has taken unjustifiable excessive time to process an application, the following disciplinary steps will be taken:

Engineering Division Manual of Procedures

- A. First occurrence → discussion with staff member and verbal warning.
- B. Second occurrence → discussion with staff member and informal written warning.
- C. Third occurrence → discussion with staff member and formal letter to individual's personnel file.
- D. Subsequent occurrence → additional progressive disciplinary steps as appropriate.

2.3.3 160 Day Reports (Tom Weeks, November 2005)

Engineers are required to complete a 160 Day Report for any application that has been complete for 160 days in an unapproved status. The report is intended to ensure the supervisor is aware of the unapproved application so that issues can be addressed and compliance with Rule 18 can be assured. Engineers are to complete the top portion of the form (see below) and forward it to the Senior Engineer between days 157 and 163 from the completeness determination. The Senior Engineer will discuss a course of action with the engineer and fill out the bottom section of the report. All completed reports will be forwarded to the Chief of Engineering.

160 Day Application Report

Submit for each Unapproved Application in-house for 160-days or more

Application No.: _____ Report Date: _____

Facility Name: _____ Rule 18 Deadline (180 days): _____

Problems with Application: _____

Information, Guidance or Resources Needed for Approval: _____

Engineering Division Manual of Procedures

Plan of Action: _____

For Senior Engineer Use

Date of Discussion(s) with Project Engineer: _____

Summary of Discussion: _____

Date of A/C Issuance: _____

2.4 Application Fiscal Management

2.4.1 Permit Fee Procedure (revised June,2014)

The following procedure will be used in processing applications and related fees for A/Cs and/or P/Os.

- A. Application fees must be substantially complete prior to acceptance of an application. . Fees and applications that are delivered personally to Engineering or Compliance personnel will be forwarded immediately to clerical staff for logging and fee deposit. Fees and applications received by clerical staff will be logged in when received and the fee payment deposited immediately before the application is forwarded to the Compliance or Engineering divisions.

An exception is when an applicant brings in cash or a check and it is determined while the applicant is still here (before the application is logged in by clerical staff) that the fee amount is incorrect. In this case, the correct amount should be paid by the applicant or the application returned for later filing with the correct fee. This is actually not an exception, since the application is not accepted and logged in with a fee payment.

- B. More than one application at a time received from an applicant with a payment covering the combined fees will be handled the same way as for a single application received, as far as logging in and fee deposit by clerical staff is concerned.

Engineering Division Manual of Procedures

Overpayment refund or collection of underpayment, if applicable, will be initiated later and referenced to the payment for those applications submitted at the same time.

- C. Engineering or Compliance staff will not attempt to apply an overpayment or underpayment of a fee for one or several applications to balance the overpayment or underpayment of a fee for another or several applications. This also applies to applications received from the U.S. Navy. (August 7, 1978)
- D. If a refund is due an applicant, the staff handling that refund and application will complete a refund worksheet form (available from the clerical department) and submit only that form to Accounting for processing. The staff member will continue processing the application. The issuance or denial of an A/C or P/O is to occur regardless of the status of the refund. (October 24, 1979)
- E. If the source test is not performed by the renewal date within the permit year for which it is collected, refunds for Schedule 92 fees will be initiated by the source test program coordinator in the Compliance division within 60 days after the permit renewal date.
- F. The monitoring and technical services division will notify the Compliance division when scheduled tests are performed, missed or cancelled. A monthly summary of source tests will be supplied to the Compliance division. This will ensure that both divisions accurately track adherence to the annual schedule. This policy will apply to all source tests on the annual schedule including the asphalt plant particulate tests (Method 5) scheduled for the summer months.

2.4.2 Application Fee Schedules (August 13, 1987)

The fee schedule placed on the application by Permit Processing when it is received is the fee schedule that is assigned to the application file. In order for both the daily time sheets and the application file to be correct, the following procedures will be used:

- A. If an application is received and the fee schedule is believed to be incorrect, the proposed changes will be discussed with the senior engineer. If the fee schedule will be changed, the senior engineer will initial the changed fee schedule on the application. Then either the original application or a copy (with the senior engineer's initials) indicating the changed fee schedule will be taken to permit processing, who will access the application file and make the fee schedule change.
- B. Changing fee schedules on the application file will be done as soon as possible after receipt of the application in engineering. This field affects other programs including the deferred revenue program and the tickler reports that are issued to request additional fees from applicants.

2.4.3 Financial Accounting of Time and Material Fees

Engineering Division Manual of Procedures

(October 12, 2000, Modified May 6, 2011)

- A. Labor charges to specific applications will not be allowed to substantially exceed the fees requested for application processing. Rule 40 states that if any deposit is insufficient to pay all actual costs, the applicant will pay an amount deemed sufficient by the APCO to complete the work in progress. If the applicant fails or refuses to pay such amount upon demand, the District may recover the same by action in any court of competent jurisdiction. A Permit to Operate will not be issued until all required fees are paid.
- B. Applicants shall be informed that additional fees will be required when total labor costs are expected to exceed the fee deposit by more than \$100 for time and material charges. This includes labor expended by technical services staff and toxics section staff. Such contact will be in the form of a written request for the additional fees and a statement of why the initial estimate was exceeded. Section E below provides procedures for preparing an invoice request.
- C. In cases where technical services staff are involved in the processing of an application (i.e. air quality impact analysis or testing), the assigned project engineer will advise the technical services division staff of the fees that have been allocated for their services. The technical services division staff will advise the assigned project engineer when approximately 85 percent of those allotted funds have been expended and the total labor cost is expected to exceed the amount allocated. The project engineer is responsible for requesting an invoice from the accounting section for any necessary additional funds from the applicant.
- D. In cases where health risk assessments are being performed by the toxics section, the assigned project engineer will advise the toxics section staff of the fees that have been allocated for their services. The toxics section staff will advise the assigned project engineer when approximately 85% of those allotted funds have been expended and the total labor cost is expected to exceed the amount allocated. The project engineer is responsible for requesting an invoice from the accounting section for any necessary additional funds from the applicant.
- E. Project engineers shall review the open application report weekly to evaluate the financial status of each application assigned to them. The column labeled "TA BALANCE - ALL ASSESSED FEES PAID" presents information on the financial status of applications including any invoices that may have been previously issued. If total labor costs are expected to exceed the deposited fees by more than \$100 (including charges by technical services division and toxics section charges), the permit engineer shall forward a request for an invoice to the accounting section specifying the additional number of hours (and associated job classification(s)) necessary to complete processing. The request must include a written justification for the additional fees and must be approved by the Senior engineer. The accounting section will prepare and distribute an invoice for the additional

Engineering Division Manual of Procedures

necessary fees taking into consideration the up-to-date financial status of the application. A copy of the invoice will be made available to the project engineer.

2.4.4 Change in Use of Task Codes for Amendments, Modifications, and Changes of Locations of Applications (July 1, 1999)

As of July 1, 1999, the task codes AMD, MAL, and COL will no longer be used for applications received for amendments, modifications or change of location.

As of July 1, 1999, the task codes for these types of applications will use the primary fee schedule(s) associated with the existing permitted equipment. Permit processing will assign the primary fee schedule to all new applications. Since the fee schedule, rather than the AMD, MAL, COL, will be used in the as the task code, billable hours should be charged to APP.

2.4.5 Fee Deposit Reference Sheet

The initial fee deposit reference sheet has been prepared as an aide in determining initial new application fee deposits. The reference sheet is available on the "S" drive and shall be updated as Rule 40 revisions are approved by the Board. The reference sheet does not include costs associated with source testing, NSR reviews, air quality modeling, CEQA or other required analyses as specified in Rule 40(d)(5). Estimated costs for Rule 1200 review is generally included based on prior experience with past similar applications. The sheet is intended as an aide in determining fees however, actual fees can vary based on application specific information.

2.4.7 Rule 40 Split Fee Payments (March 23, 1993)

Rule 40(a) and Rule 40(b) have provisions for the District to accept partial payments for new permit applications and renewals. Partial payment provisions in Rule 40 are available for businesses, which can substantiate an inability to pay the application or renewal fee in one payment.

Compliance and Engineering staff communicate with business in the field, at the front counter, on the phone, and in correspondence. To minimize the submittal of unqualified requests for partial payments, Compliance and Engineering staff are to advise business of the option of partial payment in Rule 40 only at the request of business or other indication of financial difficulty.

2.4.8 Additional Fees (October 12, 2000)

- A. Review/Approval of Additional Fees - Senior Engineers are responsible for approving additional engineering staff time charges and invoices for additional application fees. It is important that the District ensure that time charges are justified before invoices are sent.

Engineering Division Manual of Procedures

If additional time charges are due for Monitoring and Technical Services staff labor hours, the Senior Engineer should obtain written concurrence with those time charges from the Chief of Monitoring & Technical Services. In addition, when a request for analytical services is sent to M&TS, the request is to contain information on the amount of fees and time allotted for M&TS support. They will also be tracking their time and are subject to the 85% criteria as well.

- B. Charges for Additional Fees - This is a reminder that it is District policy that engineers working on permit applications where fees are charged on a T&M basis are to notify the applicant when the cost of the application related time charges (including Engineering and Monitoring & Technical Services costs) has reached 85 percent of the deposited application fees if the anticipated costs to complete the application evaluation will exceed deposited fees by \$100. An invoice from Accounting will also be forwarded. For purposes of complying with this policy, the procedure described below must be followed.

- 1) The project engineer should presume that M&TS costs will not exceed their allotted portion of the application fees. Assigned M&TS staff are being required to track their time and notify the project engineer when their time reaches 85 percent of what was allotted for M&TS support. The engineer should track Engineering time charges and notify the Senior Engineer when the Engineering time charges reach 85 percent of the allotted engineering evaluation time. If the engineer reaches the 85 percent level, assigned M&TS staff, if applicable, should be contacted to determine the status of their time charges and the need for any additional funds to cover anticipated additional future costs.

Note: When an application-related request for analytical services is made to M&TS by Engineering, be sure to include the amount of time and fees that have been allotted for M&TS support.

- 2) The Senior Engineer and project engineer are to determine what, if any, additional fees will be required to complete action on the application. If additional fees will be required, the project engineer is to notify the applicant by phone (document in application file), email or letter, explaining the reasons for the additional fees, and initiate a request for invoice. The invoice will either be attached to the notification letter or the applicant will be notified that it will be mailed.
- 3) Once all fees received have been expended, no further work on the application is to be done until the required additional fees are received, unless directed by the Senior Engineer.
- 4) If Engineering and/or M&TS staff are witnessing compliance source testing and testing must be continued or repeated the next day and this will cause

Engineering Division Manual of Procedures

District costs to exceed fees received, the project engineer (if present) or senior M&TS staff present will so advise the applicant. If the applicant verbally agrees to pay the additional costs, District staff will document this, invoice the additional costs, and may agree to return to observe testing, if appropriate. If the applicant is not available to agree to the additional costs, the project engineer or senior M&TS staff will contact the Senior Engineer, Chief of M&TS or Chief of Engineering who may authorize the additional time charges. If no one is available to authorize, or the applicant does not agree to, the additional time charges, no further test witnessing shall occur until the fees issue is resolved.

- 5) The need to request additional fees at the 85 percent level is critical to ensuring that application processing is not delayed due to fee issues. Insufficient funds do not stop the 180-day clock of Rule 18. Pursuant to Rule 40(a)(8), an application must be canceled if the applicant fails or refuses to pay the additional fees and the provisions of Rule 18 require that an action be taken.

The purpose of this policy is twofold: to ensure that limited District resources are being expended appropriately; and, to allow the applicant to make an informed decision regarding whether work on the application should continue and if there are problems in the process that the applicant can control or change to reduce costs.

In a related matter, it is noticed that the comments on some application time sheets are too vague and cannot be reasonably used to validate the time charges listed. This has been a problem in conjunction with additional fee requests. Please ensure that you provide detailed comments on application time sheets and that the associated time charges are appropriate. For example, instead of writing "Engineering Evaluation", state more specifically the activity such as "Evaluation-rule compliance review, emission calculations". This information is important not only to address applicant concerns but also to evaluate future fee schedule rates. As such, this practice applies for both T&M and fixed fee applications.

2.4.9 Revenue Billing (October 12, 2000, revised September, 2007, June 2014)

Upon completion of the application and the P/O evaluation, the following procedures will be used:

- A. Engineers will approve the application in the APP file and forward the folder to the Senior Engineer for P/O approval. All final billing will be prepared from the labor tracking files by accounting staff. If the engineer has requested additional fees via a request for invoice or tickler, he will indicate on the form if requesting final billing.

Engineering Division Manual of Procedures

- B. The Senior Engineer will approve the P/O and forward the site folder to accounting staff for final billing/refund. The senior engineer can also approve the P/O and return it to the permit engineer if minor revisions to the evaluation are required. If this is the case, it is the permit engineer's responsibility to forward the file to accounting after making the revisions.
- C. When the final invoice is paid, the accounting department will close the deferred revenue file.
- D. If there is a time deadline, the accounting department will be notified of the time frame. If the time limitations cannot be met by mailing the invoice, the invoice will be prepared and the project engineer will notify the applicant by telephone to bring in the required fee or the application will be denied, and permit cancelled.
- E. Without exception, \$100 or more will be either invoiced or refunded. If there are any erroneous charges, they will be removed via the labor tracking system. Each daily must be changed if charges are to be either reduced or added. Accounting staff will make these changes upon request.

2.4.10 Deferred Source Test and/or Permit Renewal Fee Policy (June 17, 1997)

Local businesses have requested that the District allow source test and/or permit renewal fees to be deferred for long lead-time projects expected to begin operation more than fifteen (15) months after an application for Authority to Construct is submitted. In response, the District has developed the following deferred fee policy for both fixed and time and materials (T&M) fees:

- A. If operation of an emission unit is reasonably expected to commence more than fifteen (15) months after the date an application for an Authority to Construct is submitted, payment of the initial District permit renewal fees associated with such emission unit may be deferred, at the written request of the applicant, to a time not less than four (4) months before the emission unit for which the application is submitted is first operated. In such case, the District engineer processing the application shall include a condition on the Authority to Construct stating that "A permit renewal fee shall be submitted to the District not less than four (4) months before the emission unit is first operated. This fee shall be the applicable permit renewal fee for the emission unit in effect at the time this deferred permit renewal fee is due to be paid to the District. For purposes of Rule 24, this Authority to Construct and the application(s) upon which this Authority to Construct is based, shall not serve as a temporary permit to operate until this deferred permit renewal fee is paid to the District."
- B. If initial source testing associated with evaluation of an application for Permit to Operate an emission unit is reasonably expected to occur more than fifteen (15)

Engineering Division Manual of Procedures

months after the date an application for an Authority to Construct -is submitted, payment of District fees associated with such source testing may be deferred, at the written request of the applicant, to a time not less than four (4) months before the emission unit is first operated in conjunction with the Authority to Construct. In such case, the District engineer processing the application shall include a condition on the Authority to Construct stating that, "A source test fee or fee deposit, as applicable, shall be submitted to the District not less than four (4) months before the emission unit is first operated in conjunction with this Authority to Construct. This fee shall be as specified in the appropriate fee schedule or as determined using the labor rates in effect at the time this fee is paid, as applicable. It is the applicant's responsibility to obtain the projected labor hours from the District. For purposes of Rule 24, this Authority to Construct and the application(s) upon which this Authority to Construct is based, shall not serve as a temporary permit to operate until this deferred source test fee is paid to the District."

- C. Any request to defer fees shall be made in writing by the applicant when the application for Authority to Construct and Permit to Operate is submitted to the District. The Permit Processing Section will process the application without renewal and/or source test fees (depending upon the request) when such a written request is received. The Permit Processing Section will identify on the application if any fee(s) have been deferred and the amount. The Permit Processing Section will provide a hi-lighted copy of the application to the Compliance Division. The Permit Processing Section will not subtract deferred source test and/or permit renewal fees that would otherwise be due from the fees that are initially submitted for the engineering evaluation.
- D. When the District engineer has completed the evaluation of the application, the engineer will work with the applicant to develop a joint understanding of the expected startup date and when deferred fees are due. The engineer will include the previously specified conditions, as applicable, in the Authority to Construct and ensure the Compliance Division is aware of such conditions. If there is disagreement with the applicant over the expected time frames for emission unit operation and/or source testing, this will be discussed with the Chief of Engineering or the Deputy Director for Engineering.

When deferred fees are paid, the Permit Processing Section will send the engineer handling the application and the Compliance Division a hi-lighted copy of the application showing that payment of the deferred fee(s) has been made. The deferred fees to be paid are those in effect at the time the deferred fees are due to be paid to the District.

- E. Requests to defer other fees not covered by this policy shall be evaluated on a case-by-case basis consistent with the intent of this policy. Such requests shall be discussed with the Chief of Engineering or the Deputy Director for Engineering; shall be coordinated with the Permit Processing Section, Accounting Section, and Compliance Division; and shall be documented in the application file.

Engineering Division Manual of Procedures

- F. This policy shall not apply to an emission unit installed or modified without a valid Authority to Construct from the District.
- G. If the District determines a person/business which has deferred permit renewal or source test fees has not submitted such fees as required by this policy, that person/business shall no longer be eligible to defer fees to a later date. The person/business no longer eligible shall include the owner/operator of the emission unit and the applicant, if different from the owner/operator. In such case, the permit processing engineer shall advise the Chief of Engineering and proceed with the permit evaluation. However, a Start-up Authorization or Permit to Operate shall not be issued until the deferred fees are paid. The Chief of Engineering shall advise the appropriate person(s)/business(es), in writing, that the person(s)/business(es) is no longer eligible to defer fees and the reason, and advise the Supervisor of the Permit Processing Section. The Supervisor of the Permit Processing Section shall maintain a listing of such ineligible persons/businesses.
- H. This policy will be revised to address any problems that may occur during implementation.

2.4.11 Fee Estimates for T&M Applications (July 2012)

The District has received complaints about the length of time it takes to provide fee estimates for T&M applications. To address this, please try to provide fee estimates within one working day of a request. This may occasionally necessitate making your best estimate of some components of the fee such as modeling and source testing.

If you have a particularly complex project, more time may be necessary to prepare an accurate and complete estimate. If that is the case, please discuss it with your supervisor.

2.4.12 Labor Tracking Procedures (June 14, 2011, Modified June, 2012, February 20, 2013, October 14, 2013, September 29, 2020)

It is important for billing and fee development purposes that labor be tracked accurately and consistently. In order to ensure the accuracy of the labor tracking, Engineering Division staff are required to record their time on a daily basis, using the guidance in this procedure. The supervisors are responsible for ensuring this is done. Additional guidance on using BCMS time tracking functions is provided in Section 2.5 of this Manual of Procedures.

With few exceptions, Engineering Division staff labor will be recorded in three BCMS modules as specified below.

- 1) BCMS Workflow Module - All time spent processing applications (APP records) shall be tracked in the BCMS workflow module under the appropriate workflow tasks which are also tied to specific trust accounts. There are three types of tasks:

Engineering Division Manual of Procedures

common to all applications that are billed under the fixed fee portion of a fixed fee application, tasks described in Rule 40(d)(5) as additional evaluation or processing fees, both of which are tied to specific trust accounts used by Real Time Accounting (RTA), and ad hoc tasks for other, less common tasks that are not tracked by RTA.

The following activities are the ones that are common to all applications for Authority to Construct/Permit to Operate: application acceptance, initial application review, completeness/incompleteness determination and notification, emission calculations, general facility communications, engineering evaluation preparation, AC preparation and issuance, field inspections and SA issuance, PO preparation and issuance, permit extensions and senior reviews and approvals. The time spent on these activities shall be logged into the appropriate workflow task closest to the activity.

Additional evaluation and processing activities time shall be tracked in accordance with Rule 40 sections (d)(5), (d)(8)(ii) and Schedule 93, as well as Health and Safety Code Section 42301.6 (AB3205). Specifically this will include time spent evaluating an emission unit for compliance with Rule 51, Rule 1200, Rules 20.1 through 20.8, Rules 26.0 through 26.10, Regulation X, Regulation XI, Regulation XII, Prevention of Significant Deterioration (PSD), National Emission Standard for Hazardous Air Pollutants (NESHAP), State Airborne Toxic Control Measure (ATCM), CEQA or source testing. Only time spent actually evaluating compliance with the rules and requirements listed above should be logged under these workflow tasks (for both fixed and time and materials applications). Time spent evaluating applicability of these requirements need not be logged under these workflow tasks.

These workflow tasks shall be used to track labor as follows:

- APCD Rule 51 – Time spent evaluating an application submitted to prevent a nuisance or mitigate an existing nuisance (workflow task “Dist Prohibitory Rule Analysis”)
- APCD Rule 1200 – Time spent evaluating compliance with Rule 1200 including time spent for a de minimis screening (workflow task “Toxic NSR Rules Analysis”),
- APCD NSR - Time spent evaluating compliance with Rule 20.1 – 20.8 when a specific requirement of NSR is triggered such as BACT, AQIA or offset provisions are triggered. Time spent on simple NSR tasks such as use of BACT look-up tables need not be tracked as an Ad Hoc task if the time spent does not exceed one hour. (workflow task “Dist NSR Rules Analysis” or “AQIA”)
- APCD TIV - Time spent on District permit applications for an enhanced ATC for Title V facilities when those applications require action because they constitute a Significant, Minor, Administrative, or Operational Flexibility Change as defined in Rule 1410.
- APCD NESHAP/ATCM/NSPS - Time spent evaluating compliance with and implementing requirements of NESHAPS, NSPSs and ATCMs if other than standard evaluation techniques and permit conditions are used (workflow task “State and Federal Regulations” then pick the appropriate regulation from the drop down box – HSC for state regulations, HAP for federal regulations).

Engineering Division Manual of Procedures

- APCD CEQA - Time spent evaluating applicability of and verifying compliance with CEQA requirements if that time exceeds one hour. (workflow task “State and Federal Regulations” then pick the appropriate regulation from the drop down box - CEQ)
- APCD AB3205 – Time spent implementing the public notification requirements of AB3205 in accordance with H&SC 42301.6. (workflow task “AB3205 Review and Notification”)
- APCD PSD – Time spent evaluating and enforcing provisions of Rule 20.3.1 (upon implementation). (workflow task “State and Federal Regulations” then pick the appropriate regulation from the drop down box - PSD)
- APCD Testing – Time spent witnessing a source test or reviewing source test results in accordance with Rule 40, Schedule 93. (workflow task “Source Test”)

Time spent considering and responding to public or oversight agency comments on applications shall be logged under the appropriate workflow task the comment pertains to.

Ad Hoc tasks can be added to the workflow for activities that are not otherwise covered. One of the common activities that would need an Ad Hoc task added is reinspection’s:

- APCD Reinspection – Additional time to inspect an emission unit if the initial inspection could not be performed due to circumstances beyond the control of the District in accordance with Rule 40(d)(8)(ii).

For work done under an HRA record for AB2588 Health Risk Assessments, all time spent after the emissions inventory was approved and the site notified they must conduct a HRA shall be logged into the HRA record. This includes time spent on reviewing emission factors and possibly revising the approved emissions inventory, and all work associated with a required public notification. Risk reduction plan labor shall be logged under the APP record for the PTO where the required permit conditions will be placed.

For determining if a piece of equipment or process requires a permit where we need to spend time on an evaluation (such as for emission factor development, health risk assessment, etc.), the labor shall be logged into a JOB record and tracked pursuant to Rule 40(f)(10).

Logging overtime

Expedited Applications – If you are working on expedited application please make sure to click the “overtime” box shown below to ensure accounting identifies the charge and pass the cost to the applicant, as required by Rule 40.

Task Details - Supervisor Review

Action By Division * Current Division	Action By * Current User	Assigned to Division
APCD Compliance Supervisor	Mahiany Luther	APCD Engineering
Current Status		Assigned to
New Status (Alt + S) *	Hours Spent (Alt + H)	Status Date *
Complete		01/19/2021
Comments		
Standard Comment		

☐ Overtime

Engineering Division Manual of Procedures

Overtime approved by your supervisor – When working overtime to address special projects or any other tasks, you do not need to click the “overtime” box as the cost associated with these tasks are not passed to the applicant.

JOB records shall also be used for the following tasks (unless directed otherwise):

- Rule Development support
- Fulfilling Public Record Requests (when we must create documents or analyses, so our time is billable)
- Reviewing and commenting on Major Use Permit or CEQA projects that don’t involve current permit applications

2) Time Accounting Module – The following codes will be used to track time spent on activities that support a primary activity of the Division but are not directly related to application processing or currently permitted emission units:

- Supervision – Supervision of staff (Seniors only)
- Training – General or technical training such as safety training, BCMS training, ARB or EPA classes, reviewing new rule and regulations, etc.
- Labor tracking – Time tracking in BCMS and KRONOS.
- General/Review – General activities not directly related to a permit application or a currently permitted emission unit.
- Meeting/Conferring – Discussions, meeting or other contact with District staff or external customers when not directly related to a permit application or a currently permitted emission unit.
- EI (Emission Inventory) Review – EI work (Toxics or Criteria) that is directly related to producing EI Reports. In the notation box in Time Accounting, enter the EIF ID of the facility(ies) worked on. Add a separate labor entry for each facility. If a facility is also fulfilling AB-617 inventory requirements, split the labor between EI Review and AB-617. If processing Industry-wide facilities, include all the time in one entry and enter “Industry-wide” in the notation box.
- EI General –EI work related to implementing the EI programs in a general sense which includes, but is not limited to, tracking, administrative activities, working with Compliance and addressing issues that affect many facilities.
- EIS Development – Work associated with improving the EIS online database application.
- AB-197 – Work associated with applying for or reporting under AB-197 inventory grants. The actual inventory work is logged under EI Review.
- AB-617 – Work associated with implementing AB-617. In the notation box, indicate the type of work as follows:
 - Meeting
 - BARCT
 - Permit Applications

Engineering Division Manual of Procedures

- Community Emission Reduction
- Mobile Source Incentives
- Stationary Source Incentives
- Community Monitoring
- Emission Inventory
- Stationary Source Inspections
- Mobile Source Inspections
- Administrative

For emission inventory work, also include in the notation box the EIF ID of the facility(ies) worked on, adding a separate entry for each facility. If a facility is also fulfilling criteria or toxic inventory requirements, split the labor between EI review and AB-617.

Costs for time logged to the Time Accounting Module will be recovered as part of the hourly labor rate as specified in Schedule 94, except for EI Review and EI General (that are paid from emission fees) and AB-197 and AB-617 (that are paid for from state grants).

3) Equipment Type Modules – the following codes will be used to track all time spent on currently permitted emission units, but are not associated with a particular permit:

- Meeting/Conferring – Meeting and discussions necessary to address issues related to multiple currently permitted emission unit.
- Annual Permit Review – Annual review of specific categories of existing permits per H&SC 42301(e).
- General/Review – General activities related to multiple currently permitted emission units.
- NSPS/NESHAP/ATCM – Time spent implementing NSPSs/NESHAPs/ATCMs for multiple currently permitted emission units.
- Time spent reviewing equipment or processes required by a prohibitory rule that does not require and application. As an example, review of coating spray equipment required by Rule 67.20(d)(3)(vii).

Costs for time logged to Equipment Type Modules are recovered from renewal fees or application fees, depending on the specific task(s), or, rarely, as part of an equipment type special assessment. Approval of your supervisor is required if time charged to any specific Equipment Type Module will exceed five hours for any project.

2.5 BCMS Procedures

2.5.1 BCMS record structure

Engineering Division Manual of Procedures

As shown below the general structure of the records for every facility is the original application and then the permit. Under each permit you will have all activities related to that permit, including all modification applications and compliance records

Record ID: **APCD1978-SITE-00031**

Menu List View Clone Sgl Clone Mult Update Related Records Search Loo

Go To History (1) **Related Records** Renewal Info Wo

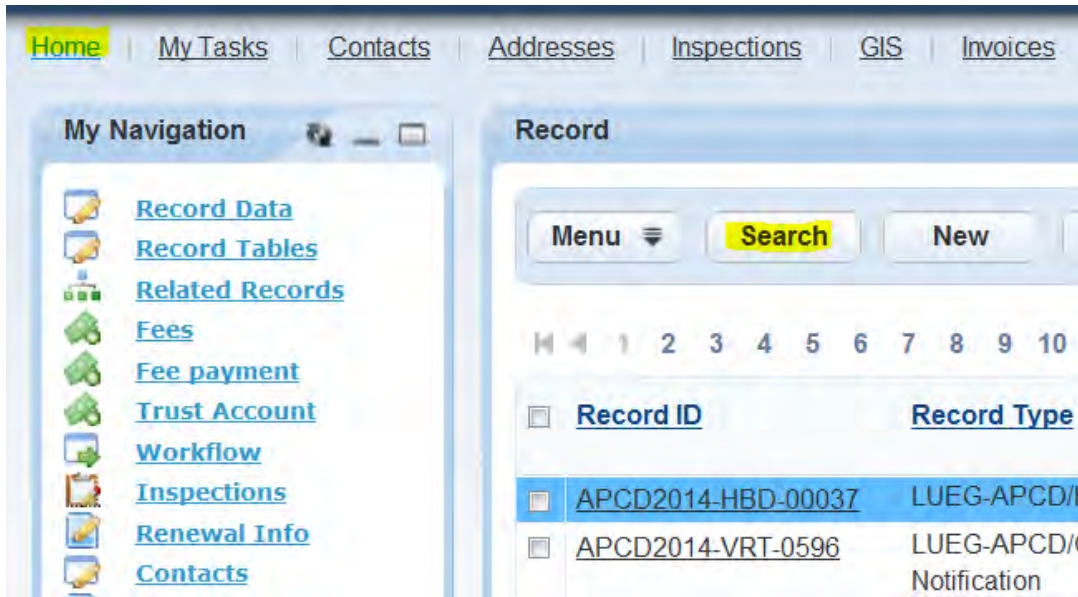
APCD1978-SITE-00031 --> [LUEG-APCD,Administrative,Site,NA] ; Status: Active

- APCD2000-APP-974535 --> [LUEG-APCD,Administrative,Site,NA] ; Status: Active
- APCD2008-PTO-974535 --> [LUEG-APCD,Administrative,Permit To Operate,NA] ; Status: Active
 - APCD2001-APP-976803 --> [LUEG-APCD,Permit App,Miscellaneous Equipment,NA] ; Status: Approved
 - APCD2003-NOV-213118 --> [LUEG-APCD,Compliance,Notice of Violation,NA] ; Status: Closed
 - APCD2007-NOV-219229 --> [LUEG-APCD,Compliance,Notice of Violation,NA] ; Status: Closed
 - APCD2000-CAR-00583 --> [LUEG-APCD,Compliance,Corrective Action Report,NA] ; Status: Closed
- APCD2000-OWC-974903 --> [LUEG-APCD,Administrative,Site,NA] ; Status: Active
- APCD2001-CER-977384 --> [LUEG-APCD,Administrative,Permit To Operate,NA] ; Status: Active
- APCD2002-PTO-977384 --> [LUEG-APCD,Administrative,Permit To Operate,NA] ; Status: Active
- APCD2001-APP-976771 --> [LUEG-APCD,Permit App,Miscellaneous Equipment,NA] ; Status: Approved
- APCD2006-PTO-976771 --> [LUEG-APCD,Administrative,Permit To Operate,NA] ; Status: Active
- APCD2013-APP-003144 --> [LUEG-APCD,Permit App,Miscellaneous Equipment,NA] ; Status: Approved
- APCD2001-CER-976533 --> [LUEG-APCD,Certificate App,Spark IC Engine,NA] ; Status: Approved
- APCD2003-PTO-976533 --> [LUEG-APCD,Administrative,Permit To Operate,NA] ; Status: Retired
- APCD2007-NOV-219229 --> [LUEG-APCD,Compliance,Notice of Violation,NA] ; Status: Closed

2.5.2 How to search records in BCMS

Click on the search bottom from the BCMS home page

Engineering Division Manual of Procedures



You can search using any of the fields under search. The following screenshot labels the most common fields used in engineering. You could also use multiple fields simultaneously

The screenshot shows the search criteria form in the Engineering Division software. The form is divided into several sections. At the top, there are buttons for 'Submit', 'Cancel', 'New', and 'Help'. Below these are search criteria fields: 'Record ID' (with a callout 1 pointing to the input field containing '%PTO%'), 'Record Type' (with a callout 4 pointing to the 'Group' dropdown), 'Opened Date' (with a callout 2 pointing to the 'From' date field), 'Status' (with a callout 3 pointing to the dropdown), and 'Contact Organization Name' (with a callout 6 pointing to the input field). There are also fields for 'Address Line 1', 'City', 'Zip', 'Contact Type', 'Record Name', 'Contact Full Name', and 'E-mail'. At the bottom, there are fields for 'Assigned to Division' (with a callout 7 pointing to the 'Current Division' dropdown), 'Assigned to Staff' (with a callout 7 pointing to the 'Current' dropdown), 'Assigned Date' (with a callout 7 pointing to the 'From' date field), 'Current Workflow Task' (with a callout 7 pointing to the dropdown), 'Current Workflow Status' (with a callout 7 pointing to the dropdown), 'Expiration Status' (with a callout 7 pointing to the dropdown), and 'Created By ACA' (with a callout 7 pointing to the dropdown). A table at the bottom left shows 'Record Data' and 'Task Specific Data' with columns for 'Record Specific Info Label' and 'Record Specific Info Value'.

1. This field is used for the record number. You may specify part of the record using percentage signs (%), as shown above, or the entire record
2. This field is used if you want to find record opened within a specified period

Engineering Division Manual of Procedures

3. This field has the status of the record. So if you only want to see open records, for example, you need to select “open”
4. You should always select LUEG-APCD to expedite the time to generate the record(s) you are searching
5. The fields “Type”, “Subtype”, and “Category” should be used to specify the type of record(s) you are searching. For example, the following screenshot shows a search for all application records for cold solvent degreasers then that 5 ft²

Record ID	% is wildcard	Opened Date:	Status
<input type="text" value="%APP%"/>		From: <input type="text"/> To: 06/04/2014	--Select--
Record Type			
Group	Type	Subtype	Category
<input type="text" value="LUEG-APCD"/>	<input type="text" value="Permit App"/>	<input type="text" value="Degreasers"/>	<input type="text" value="Cold Solvent LSA < 5 sq ft"/>

6. Organization name is used for the facility name. You can also search on the address (equipment location) using the address fields.
7. These fields are very useful when you want to search records with a certain set of conditions (i.e. BEC or CON) or records for a certain fee schedule. Please refer to the following screenshots for examples

Record Data	Record Specific Info Label	Record Specific Info Value
	<input type="text"/>	<input type="text"/>
Record TABLE Data	Record Specific TABLE Label	Record Specific Table Value
	<input type="text"/>	<input type="text" value="%91A%"/>
Task Specific Data	Task Specific Info Label	Task Specific Info Value
	<input type="text"/>	<input type="text"/>

Or

Record Data	Record Specific Info Label	Record Specific Info Value
	<input type="text"/>	<input type="text" value="%CON-000269"/>
Record TABLE Data	Record Specific TABLE Label	Record Specific Table Value
	<input type="text"/>	<input type="text"/>
Task Specific Data	Task Specific Info Label	Task Specific Info Value
	<input type="text"/>	<input type="text"/>

The following searches key words in the equipment description:

Record Data	Record Specific Info Label	Record Specific Info Value
	<input type="text" value="Permit Description"/>	<input type="text" value="%functional%group%"/>
Record TABLE Data	Record Specific TABLE Label	Record Specific Table Value
	<input type="text"/>	<input type="text"/>
Task Specific Data	Task Specific Info Label	Task Specific Info Value
	<input type="text"/>	<input type="text"/>

Engineering Division Manual of Procedures

2.5.3 How to prepare an Authority to Construct (ATC) or Permit to Operate (PTO)- (August 13, 2009, revised June of 2014)

Make sure the contacts are complete

If you working on a PTO you will need to select the PTO record. The PTO record should have the highlighted contacts shown below:

Record ID: APCD2013-PTO-001906					
Menu ▾ New Delete Look Up Help					
Go To ▾ Summary Record - Permit to Operate Activities (0) Activity Summary (1) Ac					
<input type="checkbox"/>	<u>Contact ID</u>	<u>Type</u>	<u>First Name</u>	<u>Last Name</u>	<u>Org Name</u>
<input type="checkbox"/>	62524235	APCD Customer	Lawrence	Kourie	Carlsbad Gas & Car Wash...
<input type="checkbox"/>	62524213	APCD Equipment Location	Lawrence	Kourie	Carlsbad Gas & Car Wash...
<input type="checkbox"/>	62524236	APCD Equipment Owner	Lawrence	Kourie	Carlsbad Gas & Car Wash...
<input type="checkbox"/>	62524234	APCD Invoice Mailing	Lawrence	Kourie	Carlsbad Gas & Car Wash...
<input type="checkbox"/>	62524237	APCD PTO Mailing	Lawrence	Kourie	Carlsbad Gas & Car Wash...

Existing permit records should have all contacts you need to create a PTO report. If you encounter incomplete contacts please contact the permit processing department or the senior engineer.

If you are working on an ATC you will need to select the Application (i.e. APP) record. The APP record should have the highlighted contacts shown below:

Record ID: APCD2012-APP-002456					
Menu ▾ New Delete Look Up Help					
Go To ▾ Summary Record - [26 A E F] GDF Activities (0) Activity Summary (14) Addre					
<input type="checkbox"/>	<u>Contact ID</u>	<u>Type</u>	<u>First Name</u>	<u>Last Name</u>	<u>Org Name</u>
<input type="checkbox"/>	62171097	APCD ATC Mailing	Lawrence	Kourie	Carlsbad Gas & Car Wash...
<input type="checkbox"/>	62171094	APCD Customer	Lawrence	Kourie	Carlsbad Gas & Car Wash...
<input type="checkbox"/>	62171092	APCD Equipment Location	Lawrence	Kourie	Carlsbad Gas & Car Wash...
<input type="checkbox"/>	62171096	APCD Equipment Owner	Lawrence	Kourie	Carlsbad Gas & Car Wash...
<input type="checkbox"/>	62171093	APCD Invoice Mailing	Lawrence	Kourie	Carlsbad Gas & Car Wash...

How to create a new permit record

If you are creating a new permit record (i.e. you are issuing a new permit as opposed to revising an existing permit) you will need to create the permit record as follows:

Engineering Division Manual of Procedures

1

Select the application you are working on and that will be associated with the permit you are creating

Record ID: **APCD2013-APP-003013**

Menu List View Clone Sgl Clone Mult Update Related Records Search Up

3

Select "Clone Mult"

Go To Related Records Renewal In Status Trust Accounts

2

Select related records

APCD2009-SITE-06627 -> [LUEG-APCD,Administrative] APCD2013-APP-003013 -> [LUEG-APCD,Permit A] Status: Open

6

Click submit

Record ID: APCD2013-APP-003013

Submit Cancel Help

4

Open these files until you can find "N/A" under "permit to operate"

Go To Related Records Permit Info Status Trust Accounts (3) Workflow Workflow I

Please select the Record Type

- Record Type
 - LUEG-APCD
 - Administrative
 - Change
 - Condition
 - Legacy Data
 - Permit To Operate
 - NA
 - Safety
 - Site
 - Title V
 - BCMS
 - Certificate App
 - Complaint

Please select the Record Type

LUEG-APCD/Administrative/Permit To Operate/NA

5

Click "N/A" and then click on this arrow to select the record

The image is a composite of five screenshots from a web-based permit management system, each with a numbered callout (1-5) and a descriptive text box. Screenshot 1 shows the top of the application with the 'Record ID' field set to 'APCD2013-APP-003013' and the 'Clone Mult' button highlighted. Screenshot 2 shows a list of related records, with 'APCD2013-APP-003013' selected. Screenshot 3 shows the 'Submit' button being clicked. Screenshot 4 shows a tree view of record types, with 'LUEG-APCD/Administrative/Permit To Operate/NA' selected. Screenshot 5 shows a close-up of the 'NA' selection and a yellow arrow button.

Engineering Division Manual of Procedures

Click submit

8

7

Click on "contacts" to copy the contact from the ATC record to the PTO record

Record ID: APCD2013-APP-003013

Menu List View Clone Sgl Clone

Go To Related Records Renewal Status Trust Accounts (3) Workfl

1 record(s) added successfully.

- APCD2009-SITE-06627 --> [LUEG-APCD,Administrative,Site,NA] ; Status: Active
- APCD2013-APP-003013 --> [LUEG-APCD,Permit App,Pharmaceutical Manufacturing,NA] ; Status: Open
- APCD2014-PTO-001836 --> [LUEG-APCD,Administrative,Permit To Operate,NA] ; Status: Unapproved

Enter record specific information

When working on a PTO you will need to select the PTO record and click on the "permit to operate" tab and complete the appropriate field as shown below:

Engineering Division Manual of Procedures

Record ID: APCD2014-PTO-001999

Save Reset Help

Go To Summary Record - Permit to Operate Activities (0) Addtl Info Calendar C

Permit Description
 motor vehicle refinishing operation consisting of:
 One (1) enclosed, heated, negatively ventilated paint spray booth.
 Manufacturer: Saico,
 Model: GA,
 Serial Number: 950515R
 Dimensions: 12.5 feet wide x 23.5 feet long x 10 feet high
 Stack height: 21 feet;
 Rain cap: Fixed, horizontal, directed north;
 Equipped with standard filters;
 12,500 cfm exhaust;
 Integral 1.05 million BTU per

[check spelling](#)

BEC
 APCD2013-CON-000675

Type - [Portable/Stationary]
 Stationary

Legacy Data

Legacy Reference ID

Throughput **Unit of Measure**

Source Test Information
Source Test Required
☐ Yes ☒ No

Source Test Frequency
 Source Test Frequency
 1

EQUIPMENT TYPES Add Delete

Number of Units(Number)*	Equipment Type*	Assess on Renewal*
1	[27R] Vehicle Refinishing Operations	<input checked="" type="radio"/> Yes <input type="radio"/> No

VERSION HISTORY Add Delete CSV CSV Export

Version Number(Number)*	Revision Date*	Application(Text)	Site(Text)	Reason	Notes(Text)
1	04/15/2014	APCD2013-APP-003161	APCD2013-SITE-001510	Initial	R 10

Click on the "Permit to Operate" tab

Enter the permit equipment description

Indicate if stationary or portable

Indicate if source test is required

Enter the CON or BEC number which corresponds to the set of

Enter the number of units and fee schedule and whether or not it should be assessed as a renewal

Source Test Frequency

After using the "add" button to add a new row you will enter the next version of the permit, date of review, application #, select reason and add note if necessary

When creating an ATC report you will need to select the APP record, click on the "workflow" tab and complete the appropriate field as shown below:

Engineering Division Manual of Procedures

The screenshot shows a web application interface for managing records. At the top, a header bar displays 'Record ID: APCD2014-APP-003518' and three buttons: 'Submit', 'Assign', and 'Reset'. Below this is a tabbed interface with 'Task Details' and 'Sub Tasks (0)'. The 'Task Details' tab is active, showing a 'Process Description' section. On the left, a 'Workflow Tasks' sidebar lists various categories, with 'Process Description' highlighted in red. Callout 1 points to the 'Assign' button. Callout 2 points to the 'Process Description' item in the sidebar. Callout 3 points to the 'Equipment Description' field at the bottom. Callout 4 points to the 'Complete' button in the 'New Status' dropdown. The 'Process Description' section includes fields for 'Action By Division' (set to 'Current Division'), 'Action By [ACA]' (set to 'Mahiany Luther'), 'Current Status' (set to 'Complete'), 'Billable [T&M]' (checkbox), 'New Status (Alt + S) [ACA]' (dropdown), 'Hours Spent (Alt + H)' (text input), and 'Comments [ACA]' (text area). A 'check spelling' link is also present.

Record ID: APCD2014-APP-003518

Submit Assign Reset

Task Details Sub Tasks (0)

Workflow Tasks

- Application Acceptance
- Superior Review
- Engine Evaluation
- Comp Determination
- Back
- Emis
- Dist
- Dist
- AQIA
- Toxic NSF Analysis
- AB3205 New and Notification
- State and Federal Regulations
- ATC Recommendations_Conditions
- Process Description**

Task Details - Process Description

Action By Division * Current Division Action By [ACA] Mahiany Luther

APCD Engineering

Current Status Billable [T&M] CI

New Status (Alt + S) [ACA] * Complete Hours Spent (Alt + H) *

Comments [ACA] Standard

check spelling

Equipment Description

Complete the field name "equipment description" to enter the description you want to appear on the ATC report

Add conditions

There are three ways you can add conditions to a PTO or APP record: copying conditions from an existing record (i.e. PTO, APP, or CON), adding individual conditions, or creating new conditions. Please note that for PTO you will always copy conditions from an existing CON record or BEC.

Often you will need to use all methods for ATCs because you might find another record with most of the conditions that you need but you might need to delete some condition and add others before you can generate your ATC report.

Copying conditions from existing records

Engineering Division Manual of Procedures

The image consists of two screenshots from a web application, illustrating the process of copying record conditions. The first screenshot shows a list of records with callouts 1, 2, and 3. Callout 1 points to a record ID, callout 2 points to a 'Related Records' tab, and callout 3 points to a 'Copy' option in a dropdown menu. The second screenshot shows the 'Copy To Record' screen with callouts 1, 2, and 3. Callout 1 points to a search icon, callout 2 points to a 'Record Conditions' checkbox, and callout 3 points to a 'Submit' button.

1 First select the record you want to copy the conditions from

2 Select the related record tab

3 Under Menu click select copy

Record ID: APCD2011-CON-000269

Menu List View Clone Sc Clone Mult Update Related Records

My QuickQueries

Copy

Print Page

Related Records Renewal Info Status Trust Accounts (

APCD2011.CON-000269 -> [LUEG-APCD,Administrative,Condition,NA] : Status: Active

3 Click submit

1 Search the record you want to copy to. The search screen is identical to the search screen

2 You only need to click "record conditions"

Record ID: APCD2011-CON-000269

Submit Reset Cancel Help

Copy To Record:

Copy To A Set:

Record Specific Information:

- ☐ Fee Items
- ☐ Workflow Status
- ☐ Inspection ([Select](#))
- ☐ Record Specific Info ([Select](#))
- ☐ Additional Info
- ☐ Valuation Calc
- ☐ Workflow Task Specific Information
- ☐ Status or New Status --Select--

General Record Information:

- ☐ Parcel
- ☐ Parcel Owner
- ☐ Address
- ☐ Structure
- ☐ Licensed Professionals
- ☐ Contact
- ☐ Document

- ☒ Record Conditions ([Select](#))
- ☐ Inspection Conditions ([Select](#))
- ☐ Conditions of Approval ([Select](#))
- ☐ Education
- ☐ Continuing Education
- ☐ Examination

Once you click "submit" the records for which you copy the conditions to will have the new conditions. You can copy condition from ANY record to another record.

Applying conditions individually (for ATC reports only)

Engineering Division Manual of Procedures

After selecting the record for which you want to apply the condition to, click on "condition"

1

2

Click on NEW

Record ID: APCD2014-APP-003523

Menu New Reorder Delete

Go To Summary Record - [26A]

☐ Display Type Condition Short Com
Order Name

Record ID: APCD2014-APP-003523

Submit Reset Cancel

Click on standard condition

Go To Summary Record - [26A] Act **3**

Group * Standard Condition Type * Standard Condition

--Select-- --Select--

Short Comments Standard Comment

Engineering Division Manual of Procedures

Record ID: APCD2014-APP-003523

Submit Reset Cancel Help

Go To [dropdown] [dropdown] [dropdown] [dropdown] [dropdown]

Condition Name [text] Condition Group APCD Condition Type --Select--

Severity --Select-- Short Comments [text] Long Comments [text]

Search Tags [text] Display Notice
☐ Accela Automation
☐ ACA
☐ ACA Fee Estimate Page

[check spelling](#)

Callouts:

- You can enter the condition number starting with "C"
- You can enter the BEC number, fee schedule or CON number associated with this condition using %
- You can enter the condition verbiage or part of the condition verbiage using "%"

After specifying the search criteria click submit. The condition will appear as shown below

Record ID: APCD2014-APP-003523

Submit Reset Cancel Help

Conditions [dropdown] [dropdown] [dropdown] [dropdown] [dropdown]

Standard Condition Type Standard PTO Conds

Short Comments Standard Comment
C29099 - Separate usage records shall be

[check spelling](#)

Long Comments Standard Comment
Separate usage records shall be maintained, for each spray booth, on-site on a monthly basis for a period of at least three years and shall be made readily available to the District upon request. Records shall at minimum contain the following information:
-type of substrate coated (metal parts, aerospace components, etc.)
-the type of coating applied (basecoat, hardener, thinner, clean-up, etc., including the manufacturer's Identification Number)
-mix ratios and volumes of each material containing VOC's used.
(Rule 20.2)

Callouts:

- 1 Press "shift" and click on the condition. If you don't press "shift" you will need to conduct your search again
- 2 A separate screen will open and you will be able to view the condition and decide if it is the condition you need. If so, click submit and the condition will be applied to your record

Engineering Division Manual of Procedures

Creating new conditions (for ATC reports only)

Address [Inspection]
Conditions
Change Status
Status History
Summary Entry

Record ID: APCD2014-APP-003508

Menu New Reorder Delete

Go To Summary Record - [26]

1 2 3 4

Display Type Order Name

1 After searching the record you want to copy the condition to, click on the condition tab

2 Then click new

Record ID: APCD2014-APP-003508

Submit Reset Cancel Help

Go To Summary Record - [26A] Activities Act

Group Standard Condition Type Standard Condition

--Select-- --Select--

Short Comments Standard Com

3 Then click on standard condition

Record ID: APCD2014-APP-003508

Submit Reset Cancel

4

Go To Summary Activity Summary Address

Condition Name Condition Group Condition Type

APCD ATC Conds

Severity Short Comments Long Comments

--Select--

5 Enter the condition verbiage and click submit

check spelling

Engineering Division Manual of Procedures

Once the condition is applied to the record you will need to renumber the conditions

Record ID: APCD2014-APP-003508

Menu New Reorder Delete

Go To Summary Record - [26A]

1 2 3 4

Display Order	Type	Name	Short Con
1	ATC Conds	ARB Cert	
2	ATC Conds	Drawings	
3	ATC Conds	AI IOM	
4	ATC Conds	CCN IOM	
5			
6			

Then click reorder

Enter the condition numbers

Running the report

ATC REPORT

1 Select the APP record for which you are generating the ATC report

2 Select "Authority To Construct" under the "APCD Engineering" reports

3 A separate screen will open. Click submit to view the report

Record ID: APCD2014-APP-003508

Menu New Reorder Delete Vi

Summary Record - [26A] Act

Change Status
Status History
Summary Entry

Reports

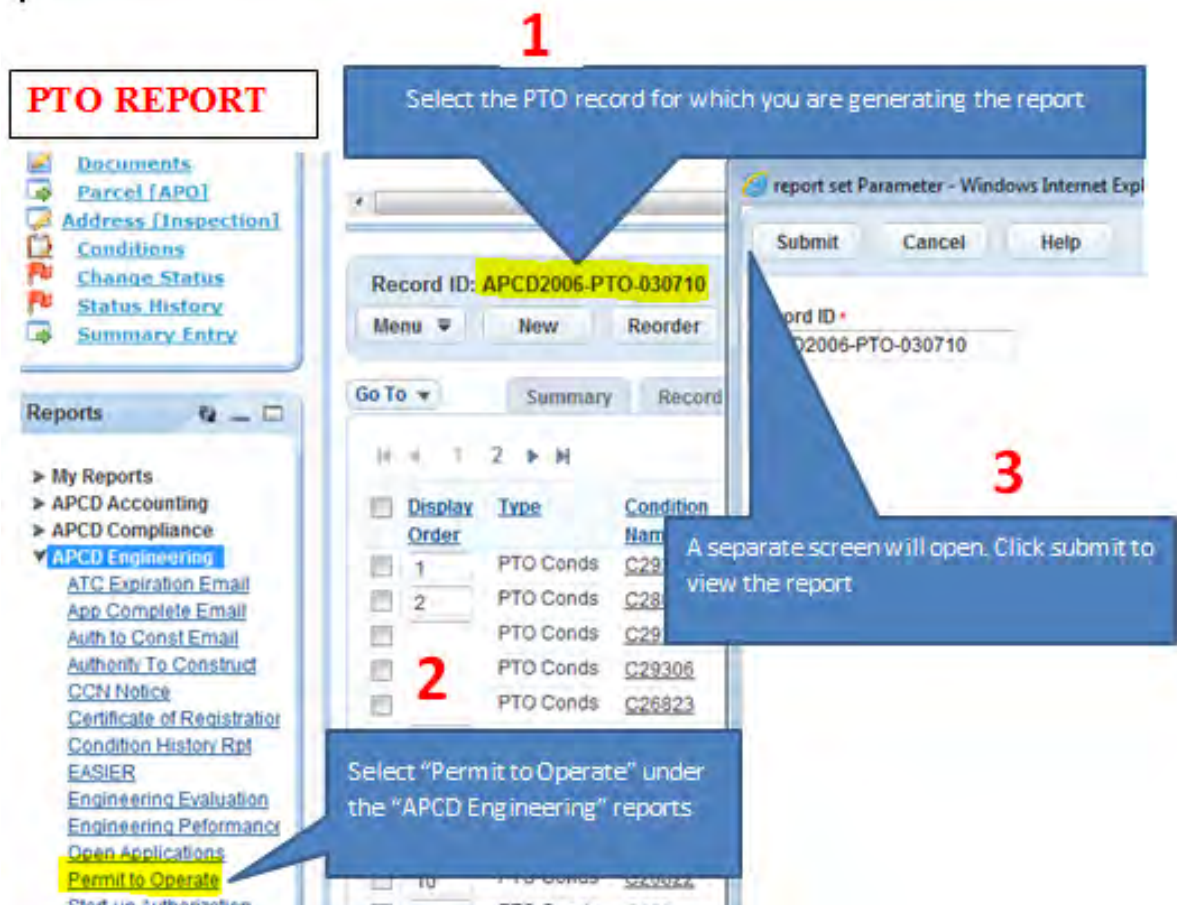
- My Reports
- APCD Accounting
- APCD Compliance
- APCD Engineering
 - ATC Expiration Email
 - App Complete Email
 - Auth to Const Email
 - Authority To Construct
 - CCN Notice
 - Certificate of Registration
 - Condition History Rpt
 - EASIER
 - Engineering Evaluation
 - Engineering Performance

report set Parameter - Windows Internet Explorer

Submit Cancel Help

Record ID +
APCD2014-APP-003508

Engineering Division Manual of Procedures



2.5.4 How to use documentum (created:September 25, 2009, revised in October of 2009, June of 2010, and June 2014)

Section 1: What do I upload?

A. The following documents should be posted under the APP record after the Authority to Construct is approved:

Completeness Letter

Incomplete Letter

Relevant Correspondence

Complete Engineering Evaluation, including calculations and HRA/AQIA results (signed by the Senior engineer)

Approved Authority to Construct (signed by the engineer)

B. The following documents should be posted under the APP record prior to submitting a Permit to Operate for approval:

Pre-backfill inspection reports (Vapor recovery sites)

Engineering Division Manual of Procedures

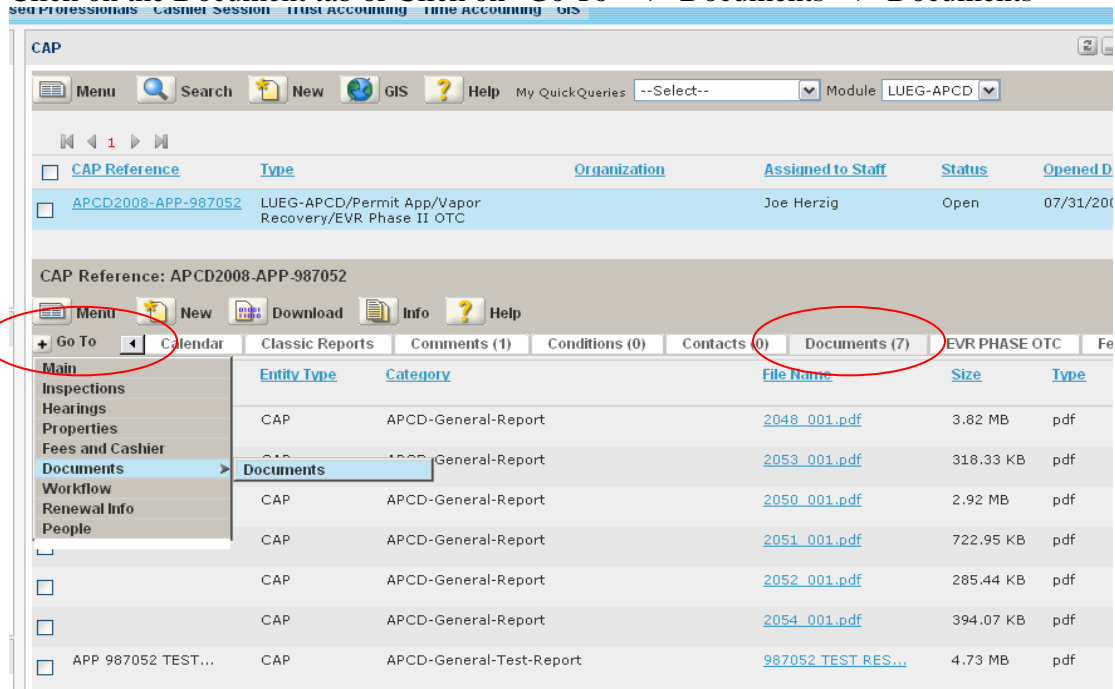
Field inspection reports, including pictures
Test results
Startup Authorization
CCNs
Invoices

The following document should be posted under the PTO record:

Permits to Operate

Section 2: How do I upload my documents?

Click on the Document tab or Click on "Go To" => "Documents" => "Documents"

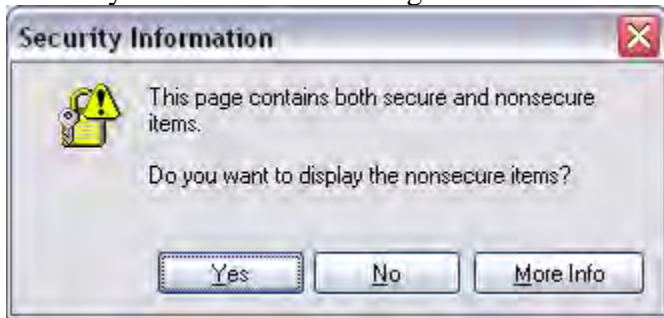


You will be prompted to enter your Documentum User Name and Password

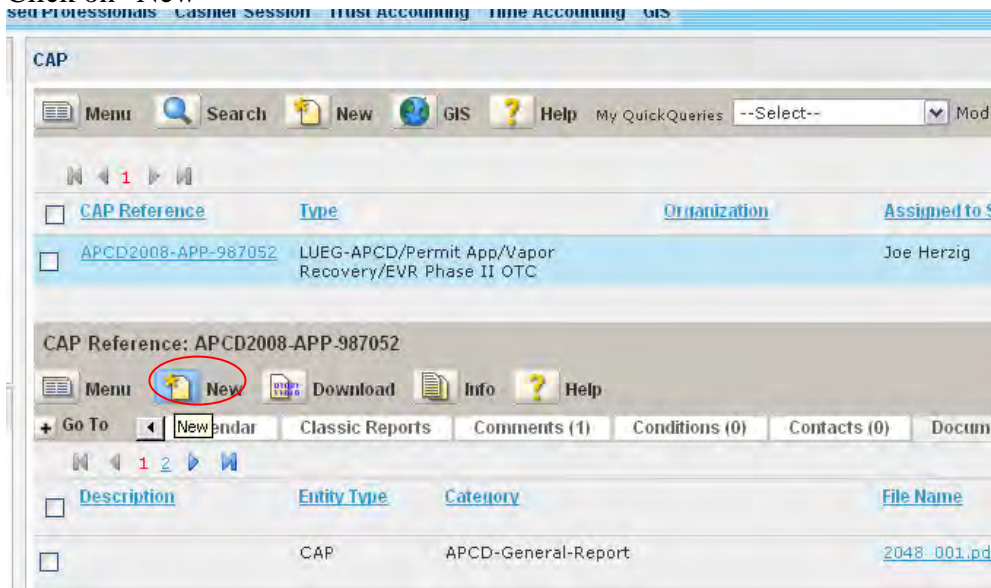


Engineering Division Manual of Procedures

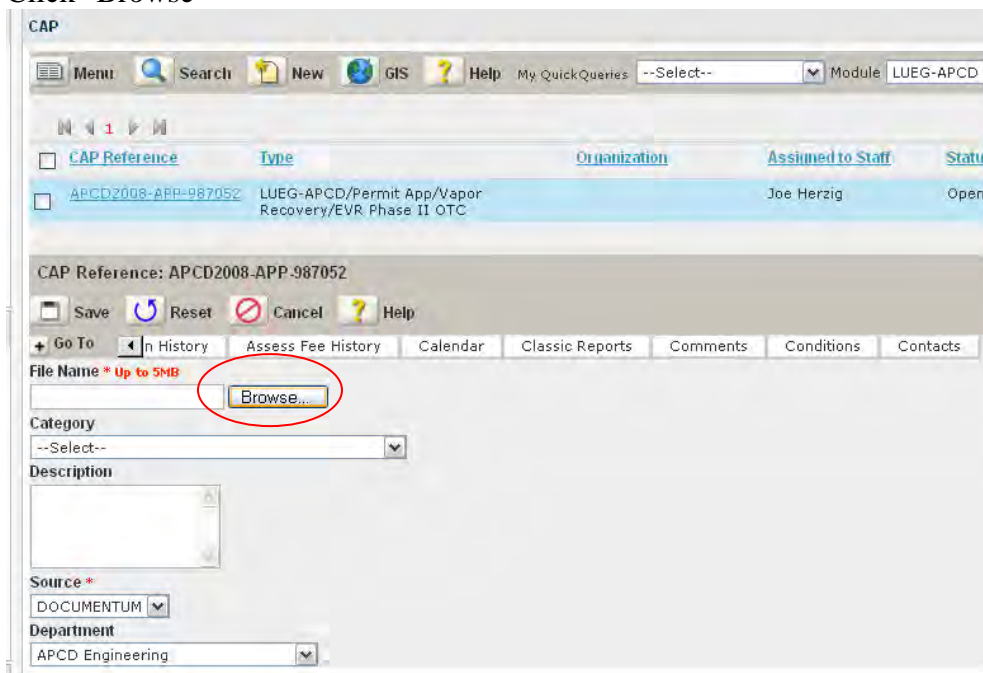
You may be asked the following: Click "Yes".



Click on "New"

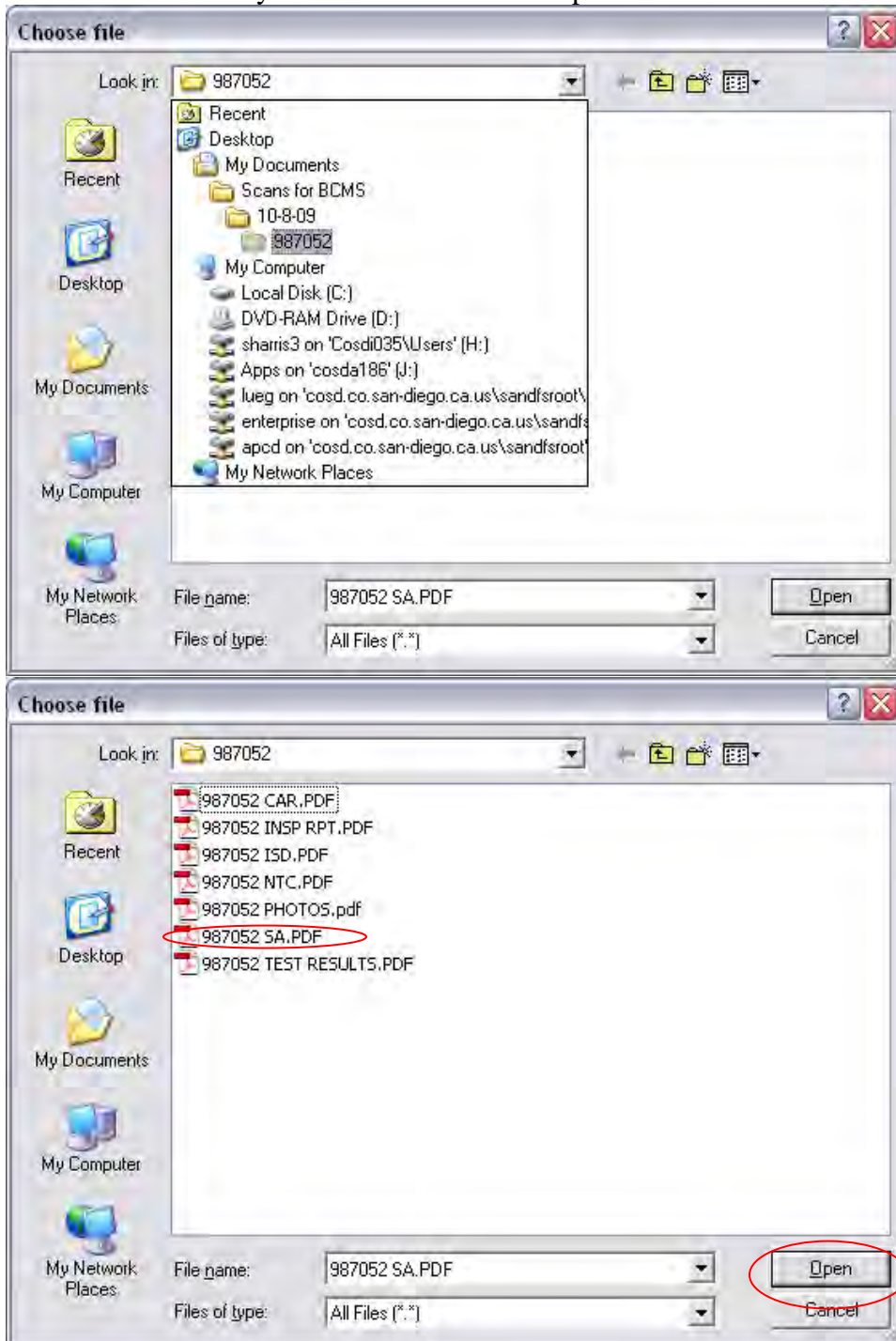


Click "Browse"



Engineering Division Manual of Procedures

Select the document you want to add: Click "Open"



2.5.5 How to name documents in BCMS (created on November 1, 2012, revised on December 12, 2013)

The intent of this procedure is to consistently name documents posted in BCMS (under documentum). The following table lists all engineering related documents and describes how to name each document.

Type of Document ¹	File Name	Document ²	Group/Category ³	Division ⁴	Description ⁵
Supporting Application Records	APPXXXXXX_Records	APCD-GEN-Document	APCD-General-Application	Click on "Current Division"	E.G. manufacturer information on emission factors/source tests supporting the emission factor/BACT costs
Completeness Letter	APPXXXXX_Completeness Letter	APCD-GEN-Document	APCD-General-Letter		
Incomplete Letter	APPXXXXXX_Incomplete Letter	APCD-GEN-Document	APCD-General-Letter		
Relevant Correspondence	APPXXXXXX_correspondence	APCD-GEN-Document	APCD-General-Correspondence		Briefly describe the content of the correspondence (e.g. permit conditions, VOC limitation, comments of draft ATC, additional information required for the HRA, justification of the "trade secret" designation etc...)/Variances/Appeals
Public Notification	APPXXXXXX_Public_Notice	APCD-GEN-Document	APCD-General-Correspondence		Notification/Proof of publication/Transmittals to ARB, EPA, etc./Public Comments/Agency comments/Applicant Comments

Engineering Division Manual of Procedures

502(b)(10) determination	APPXXXXXX _502(b)(10)	APCD-GEN- Document	APCD-General- Evaluation	Click on "Current Division"	502(b)(10) determination
Engineering Evaluation (signed by the Senior eng.)	APPXXXXXX _ATC_Eng. Evaluation	APCD-GEN- Document	APCD-General- Evaluation		
BACT Analysis	APPXXXXXX _BACT	APCD-GEN- Document	APCD-General- Evaluation		
HRA	APPXXXXXX _HRA	APCD-GEN- Document	APCD-General- Evaluation		
AQIA	APPXXXXXX _AQIA	APCD-GEN- Document	APCD-General- Evaluation		
Calculations	APPXXXXXX _Calculations	APCD-GEN- Document	APCD-General- Evaluation		
Authority to Construct (signed by the engineer)	APPXXXXXX _ATC	APCD-GEN- Document	APCD-General- Authority-to Construct		N/A
Pre-backfill inspection report (vapor recovery sites)	APPXXXXXX _Pre-backfill inspection	APCD-GEN- Document	APCD-General- Report		
Field inspection report, including pictures	APPXXXXXX _Inspection report	APCD-GEN- Document	APCD-General- Report		
VR test results	APPXXXXXX _VR test results	APCD-GEN- Document	APCD-General-Test- Report		
Startup Authorization	APPXXXXXX _SA	APCD-GEN- Document	APCD-General- Startup-Authorization		N/A

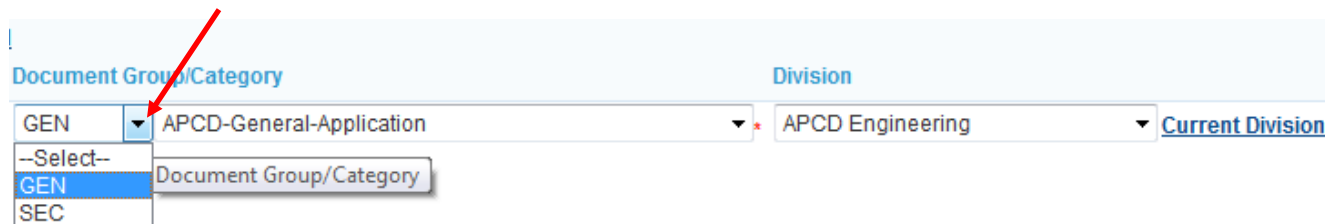
Engineering Division Manual of Procedures

PTO Eng. Evaluation	APPXXXXXX _PTO Eng. Evaluation	APCD-GEN-Document	APCD-General-Evaluation		N/A
PTO Request changes ⁷	PTOXXXXXX _Request change	APCD-GEN-Document	APCD-General-Correspondence		Compliance PTO request change
ERC	ERCXXXXXX	APCD-GEN-Document	APCD-General-Certificate		ERC certificate/Surrendered ERCs
ERC Transfers	ERCXXXXXX _letter	APCD-GEN-Document	APCD-GEN-Document		Letter from Buyer/Letter from Seller/Purchase & Sale Agreement
Hearing Board decisions	APPXXXXXX _Hearing_Board Letter	APCD-GEN-Document	APCD-General-Correspondence		
Lead agency CEQA documents	APPXXXXXX _CEQA	APCD-GEN-Document	APCD-General-Evaluation		

¹*Type of document:* This column lists all engineering related document that is typically posted in BCMS

²*File Name:* You will need no name the file when you are saving the document or scanning it. The first part of the name should be the APP number

³*Document:* This column indicates what should be selected in BCMS (i.e. GEN or SEC) from the following drop down list. "SEC" should only be selected for documents that contain **proprietary information**. In accordance with Rule 176, written justification of the "trade secret" designation shall be furnished with the records so designated, and the justification shall be a public record. When the engineering evaluation or calculation contains information designated as trade secret, the engineer should prepare another version of these documents, without the trade secret information, which will be available for public review.



Document Group/Category: GEN (selected) | Division: APCD Engineering (Current Division)

Document Group/Category options: -Select-, GEN, SEC

Engineering Division Manual of Procedures

⁴ *Group-Category*: This column indicates what type of document should be selected in BCMS from the following drop down list

The screenshot shows a web form for creating a document. At the top, there is a 'Record ID: APCD2010-APP-001067' and buttons for 'Save', 'Add', and 'Delete'. Below these are 'Go To', 'Summary', and 'Record' tabs. The main form area has fields for 'Document Group/Category *', 'Division', and 'Description'. The 'Document Group/Category' dropdown is open, showing a list of document types. A red arrow points to the top of this list. The 'Division' field is set to 'APCD Engineering' and has a link 'Current Division' next to it. The 'Description' field is empty. There is a 'check spelling' link. At the bottom, there is a section for 'Apply Definitions to Selected' with checkboxes for 'File Name * Up to 100MB Document Group' and 'FW_PO Change Request-PTO050295.pdf'. The 'Document Group' dropdown is set to 'GEN' and the 'Document Type' dropdown is set to 'APCD-General-Application'.

Record ID: APCD2010-APP-001067

Save Add Delete

Go To Summary Record

"GEN" document types are accessible to

Document Group/Category *

GEN

Division [Current Division](#)

APCD Engineering

Description

[check spelling](#)

Please use the fields at the bottom of the

[Apply Definitions to Selected](#)

☐ File Name * Up to 100MB Document Group

☐ FW_PO Change Request-PTO050295.pdf

Document Group/Category: GEN

Document Type: APCD-General-Application

⁵ *Division*: You should always click on "Current Division" in BCMS so the appropriate division will appear

The screenshot shows the bottom part of the BCMS document creation form. It has three dropdown menus: 'Document Group/Category' (set to 'GEN'), 'Document Type' (set to 'APCD-General-Application'), and 'Division' (set to 'APCD Engineering'). A red arrow points to the 'Current Division' link next to the 'Division' dropdown. Below the dropdowns is a 'Description' field and a 'check spelling' link.

Document Group/Category: GEN

Document Type: APCD-General-Application

Division: APCD Engineering

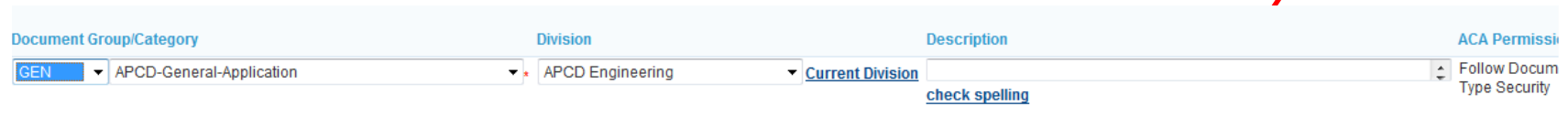
[Current Division](#)

Description

[check spelling](#)

Engineering Division Manual of Procedures

⁶*Description:* This column specifies how to name the documents (i.e. what to enter under the following field). Some documents, such as Permit to Operate, do not need to be named because the selected category from the drop down list already specifically describes the document. This column has “N/A” for the documents that do not need to be named.



The screenshot shows a form with four main sections: 'Document Group/Category', 'Division', 'Description', and 'ACA Permissi'. The 'Document Group/Category' section has a 'GEN' dropdown and a text field containing 'APCD-General-Application'. The 'Division' section has a dropdown menu showing 'APCD Engineering'. The 'Description' section has a text field with the placeholder 'Current Division' and a 'check spelling' link below it. The 'ACA Permissi' section has a dropdown menu showing 'Follow Docum' and 'Type Security' below it. A red diagonal line is drawn above the 'Description' field.

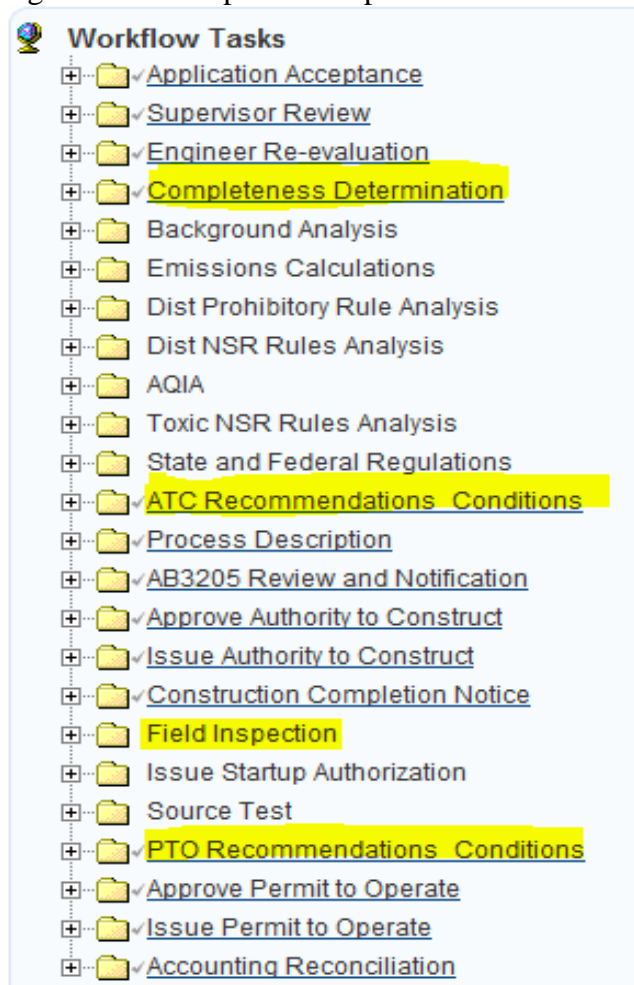
⁷These documents will be posted under the PTO record

1.5.6 How to enter time under the workflow and ad hoc tasks. (September 11, 2009, revised October 2, 2009, December 15, 2010, and June of 2014)

The labor track procedure is in section 2.4.12 of this MOP. This procedure will only show how to enter the time using BCMS.

When entering time under the workflow for an application, the following tasks should be used:

- Completeness Determination – The time entered under this task represents the time spent to review applications for completeness (i.e. review information provided, contact the applicant, prepare completeness/incompleteness letters)
- ATC Recommendation Conditions- The time under this task includes all engineering charges up until when the ATC evaluation is submitted for approval
- Field Inspection- The time under this task includes the time to conduct the inspection and issue a SA Authorization, which should be issued during the SA inspection.
- PTO Recommendation Conditions- The time under this task includes the time spent preparing the BEC and permit to operate evaluation.



Engineering Division Manual of Procedures

When entering your time, please use the comment box to describe the task you are currently working on. For example, if you are conducting emission calculations, you should enter “calculations” as follows:

Record ID: APCD2010-APP-001432

Menu Submit Assign Reset Calculate Hours Cancel Help

+ Go To Record Specific Info Tables Record Status History Related Records Renewal Info Status St

Task Details - ATC Recommendations_Conditions

Status Date * 11/30/2010 Assigned to Division APCD Engineering Assigned to

Action By Division * APCD Engineering Action By [ACA] * Current User Mahiany Luther Current Status

Comments Standard Comment Calculations New Status [ACA] (Alt + S) * --Select--

Hours Spent (Alt + H): *

Billable: ☐ Checking Billable will assess fees based on your labor rate.

Due Date 11/23/2010 APCD Process Form Overtime: ☐

The following list has examples of descriptions that can be used under “Completeness Determination”:

- Incomplete Letter
- Complete Letter
- Review

The following list has examples of descriptions that can be used under “ATC Recommendation Conditions”:

- Prepare ATC
- Calculations
- Prepare conditions
- Discussion with other staff members
- Prepare evaluation
- Meetings
- Public contact
- Reviewing
- Prepare rule evaluation
- Prepare S/A

Engineering Division Manual of Procedures

The following list has examples of descriptions that can be used under “PTO Recommendation Conditions”:

- Calculations
- Review charges
- Prepare conditions
- Discussion with other staff members
- Prepare evaluation
- Meetings
- Public contact
- Reviewing
- Prepare rule evaluation

Ad hoc tasks must be used in accordance with the labor track procedure is in section 2.4.12 of this MOP. This section only covers how to use BCMS to enter your time.

Record ID: APCD2013-APP-003110

Menu New Supervisor Task Activation Help

Go To (1) Workflow Workflow History (2)

Click NEW

Select the APP record and click on the workflow tab

Ad Hoc Task

Task Name * -Select- Task Description *

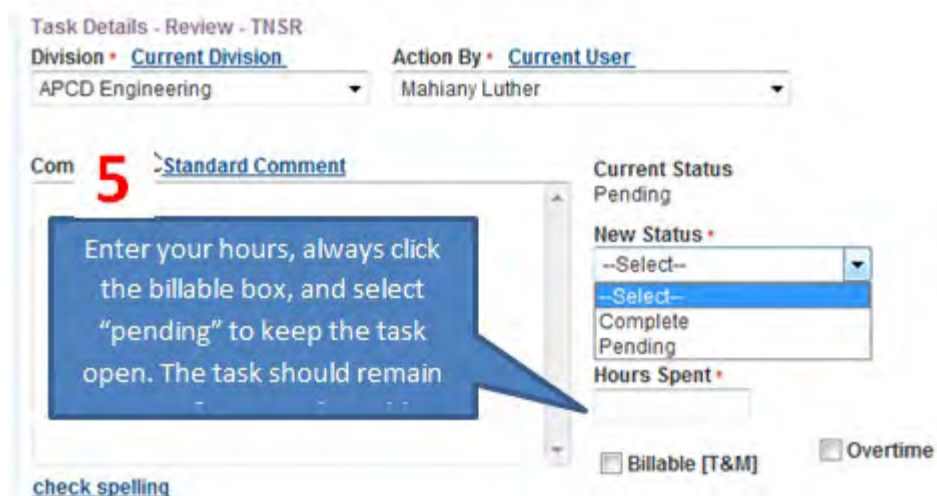
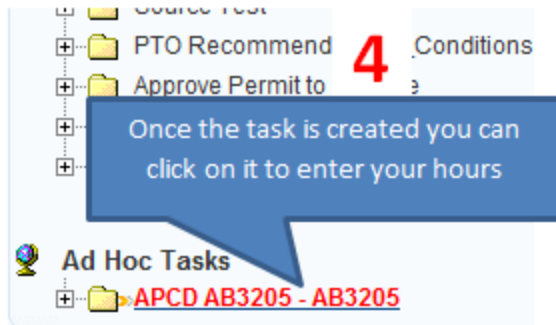
Division * Current Division Current User

Assign Date * 06/18/2014 Duration

Billable

A second screen will appear. You will need to complete the fields (select the task, name the task, etc...)

Engineering Division Manual of Procedures



2.5.7 How to generate timesheet

2.6 Reactivation of Inactive Status Permits (Tom Weeks, April 2009)

Permits can remain in inactive status for extended periods. Permit that are in inactive status do not undergo annual permit review as required by Health and Safety Code 42301(e). Therefore, prior to reactivation they must undergo evaluation to ensure that the permit is adequate to ensure enforceability and is consistent with current requirements in accordance with the following:

42301(e) Require, upon annual renewal, that each permit be reviewed to determine that the permit conditions are adequate to ensure compliance with, and the enforceability of, district rules and regulations applicable to the article, machine, equipment, or contrivance for which the permit was issued which were in effect at the time the permit was issued or modified, or which have subsequently been adopted and made retroactively applicable to an existing article, machine, equipment, or contrivance, by the district board and, if the permit conditions are not consistent, require that the permit be revised to specify the permit conditions in accordance with all applicable rules and regulations.

Engineering Division Manual of Procedures

This evaluation may result in significant revisions to the prior permit to incorporate new prohibitory rule requirements, new state and federal rule requirements (NSPSs, NESHAPS, ATCMs, etc.) and to ensure that permit condition language is consistent with currently active permits. If changes to the permit are necessary, a revised SA should be prepared and discussed with the applicant prior to issuance and the changes documented using a standard engineering evaluation. Because the emission unit is not considered new and is not being modified, it would not be subject to New Source Review provisions.

Fees for reactivation are specified in Rule 40 (e)(5) and include evaluation fees and a pro-rated renewal fee. The evaluation fee is a fixed amount (49(b)) regardless of the actual cost.

2.7 Permit Process Overview (Nick Horres, October 2020)

The District has a general process used by Engineering for most permit evaluations. There are some situations where not all steps are required, only an abbreviated review is necessary or additional steps are required. These situations are discussed elsewhere in these procedures and in District rules. You should expect to follow each of these steps except as specifically indicated by your supervisor.

1. **Pre-Application.** For more complicated applications, the Applicant may request to discuss the application prior to submittal. Engineers also provide fee estimates and assist with completing application forms and discussing rule applicability for potential equipment.

If an applicant specifically requests an invoice before submitting an application, an invoice request must be generated. In this case, the engineer will forward a request to the Engineering Aide and provide a fee estimate including all the needed site and contact information, the reason for the invoice, i.e. "Deposit for the expected fees to review an application for a [specify type of equipment]", invoice amount and contact person. The Aide will then create an application record in "Pending Funding" status and forward the invoice request to Accounting including the application number and adding the site ID for new sites.

2. **Application submittal.** The applicant will mail, drop off or email the application which will include a general application form and usually attachments and supplemental forms. They must also include a check or can pay by credit in person or over the phone. The Engineering Aide works with front desk and accounting staff to set up the application in BCMS.
3. **Completeness Review.** Engineers review the forms and attachments to determine if sufficient information has been received to review the application and deems the application complete if so. If Incomplete, the engineers put together a list of missing information and communicates this to the applicant. It is important to catch as much information at this stage as possible, but expanding upon the information submitted or additional information requests may be made if

Engineering Division Manual of Procedures

necessary. Note that because Rule 18 places limits on the length of time the District may take for review, an accurate completeness/incompleteness determination is necessary.

- 4. Engineering Evaluation.** Engineers calculate emissions, review the equipment design, compare the equipment to rules and conduct other technical analysis to determine if the equipment will meet all rules and requirements. The engineer prepares an “engineering evaluation” report summarizing the findings.
- 5. Prepare Draft A/C.** Along with the engineering evaluation, the engineer prepares an authority to construct by utilizing the application record in BCMS.
- 6. Public Notice (if required).** Certain types of applications may require conducting a public notice. Drafts of the engineering evaluation and authority to construct should be ready before starting any public notices.
- 7. Senior Review/Approval.** Senior Engineer reviews and may recommend changes. When ready the application is approved in BCMS.
- 8. Issue A/C.** The Authority to Construct is issued from BCMS along with a construction completion notice that the applicant will return once the project is completed. In some cases, such as when the equipment has already been constructed, we issue a startup authorization directly instead of an A/C.
- 9. Applicant Returns CCN.** After finishing construction, the applicant will return the construction completion notice to us. It must be returned prior to beginning operation of their equipment or they are in violation of District rules and can receive a notice of violation.
- 10. Initial Inspection & Source Testing.** Once receiving the construction completion notice, we typically schedule an initial inspection with the facility. Engineers should contact the applicant within two weeks to schedule an inspection unless otherwise discussed with your supervisor. During the inspection we verify that equipment installed matches the proposal, take photos of equipment, and review compliance with the permit conditions. For some basic equipment types we may elect to do this inspection remotely by having the site contact send photos of the equipment and explaining permit requirements. Permit conditions may also require that the applicant conducts a source test to show compliance with emission limits. All documentation from the inspection and testing should be uploaded to the application in BCMS.
- 11. Updates & Revisions to Conditions & Description.** New/modified equipment may require changes to the conditions or description on the permit. This is typically based on information determined during the inspection or during initial stages of operation. Minor changes can be made in BCMS and implemented when

Engineering Division Manual of Procedures

the S/A is issued. Any changes that affect the original conclusions of the evaluation should be discussed and approved by a Senior Engineer prior to implementation. Changes from the ATC to the permit stage should be minimized to the extent possible and significant changes should be provided to the applicant for their review prior to issuing the final permit.

- 12. Issue S/A.** A startup authorization should always be issued for each application unless you have discussed with your supervisor a reason not to. Typically the startup authorization should be issued immediately after the inspection.

An S/A can also be issued with a shorter term duration when a small deficiency is identified during the inspection that needs to be corrected. Common cases where a shorter term S/A are warranted are things like a incorrectly sized exhaust stack, lack of required maintenance manuals or deficient monitoring. The exact duration and requirements should be discussed with your supervisor, but generally will require meeting the requirements within 10 – 60 days. A major deficiency should be brought to the supervisor's attention for possible permit denial or revocation of temporary authority to operate.

- 13. Prepare Conditions in BCMS (new conditions or new sets).** Conditions should be initially prepared on the application record. If the permit will involve any new conditions or a new/modified set of conditions, some additional steps are involved that ensure we use consistent wording on all permits. Engineers check that for any new conditions or revised conditions, an equivalent reference condition does not already exist. For any modified conditions or condition sets, the engineer also checks whether the condition/set is used on any permits that are not affected by the application. If any others are affected, new conditions/new set is created, otherwise the condition/set should instead be modified.

- 14. Review and Approval of Conditions (new conditions or new sets).**

Immediately before permit issuance, the final conditions are sent to your senior then Compliance for review and approval. The primary point of review is that the entire set of conditions is enforceable. Once it is thought to be relatively sure that no significant changes will occur, drafts can be sent to the facility (often as an S/A). It usually helps your Senior if you can explain any changes in a simple format.

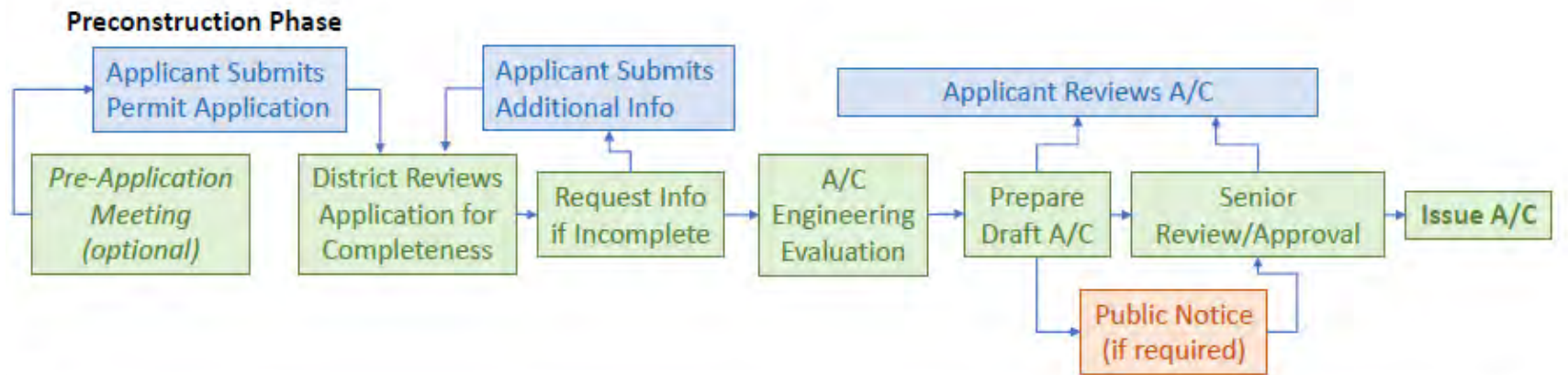
- 15. Prepare Inspection Report and PTO Engineering Evaluation.** For PTO issuance, we also prepare an inspection report/engineering evaluation. The inspection report should be completed as soon as possible after the inspection and makes up the bulk of the evaluation. The evaluation should also discuss any changes to conditions, results of source testing or additional analysis, and will recommend a condition set and approval of the permit.

Engineering Division Manual of Procedures

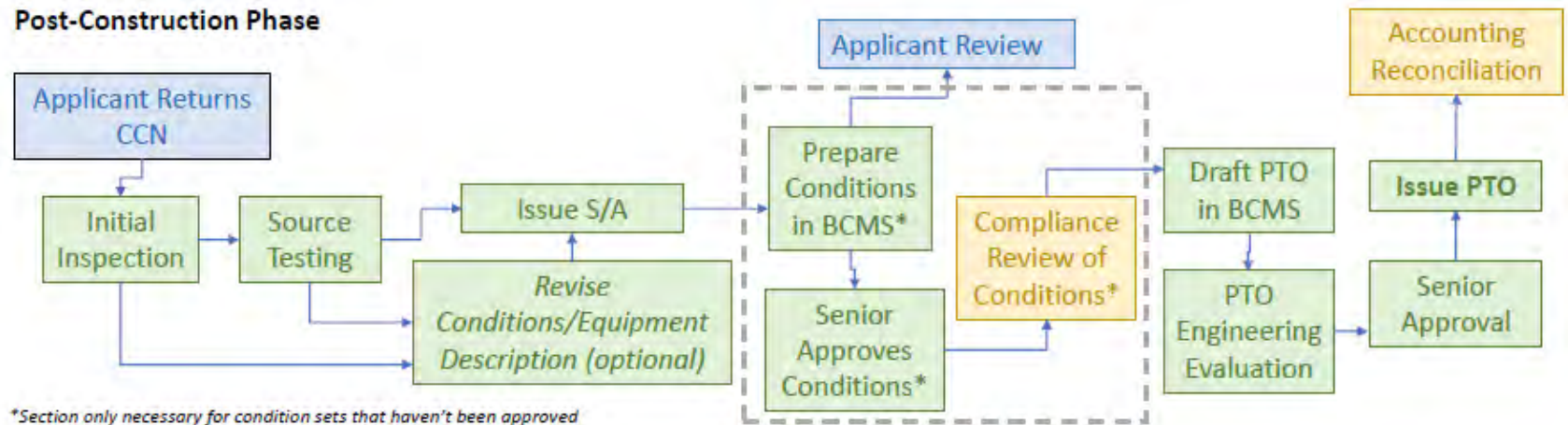
16. Prepare the PTO. The last step before submitting the application for review is to prepare the PTO in BCMS. This requires adding the equipment description, entering the BEC number, applying the conditions and setting the number and type of emission units and updating the PTE emission table for each pollutant.

17. Senior Approval. The senior engineer reviews the application and approves the permit. The engineering Aide then sets certain parameters in BCMS to ensure the permit will be issued correctly, checks the status of any outstanding renewal fees, then either issues the permit or requests and sends an invoice for outstanding renewal fees. Once the permit is issued, it finally goes to Accounting who does the last step of renewal fees.

The following figures provide a graphical representation of the process.

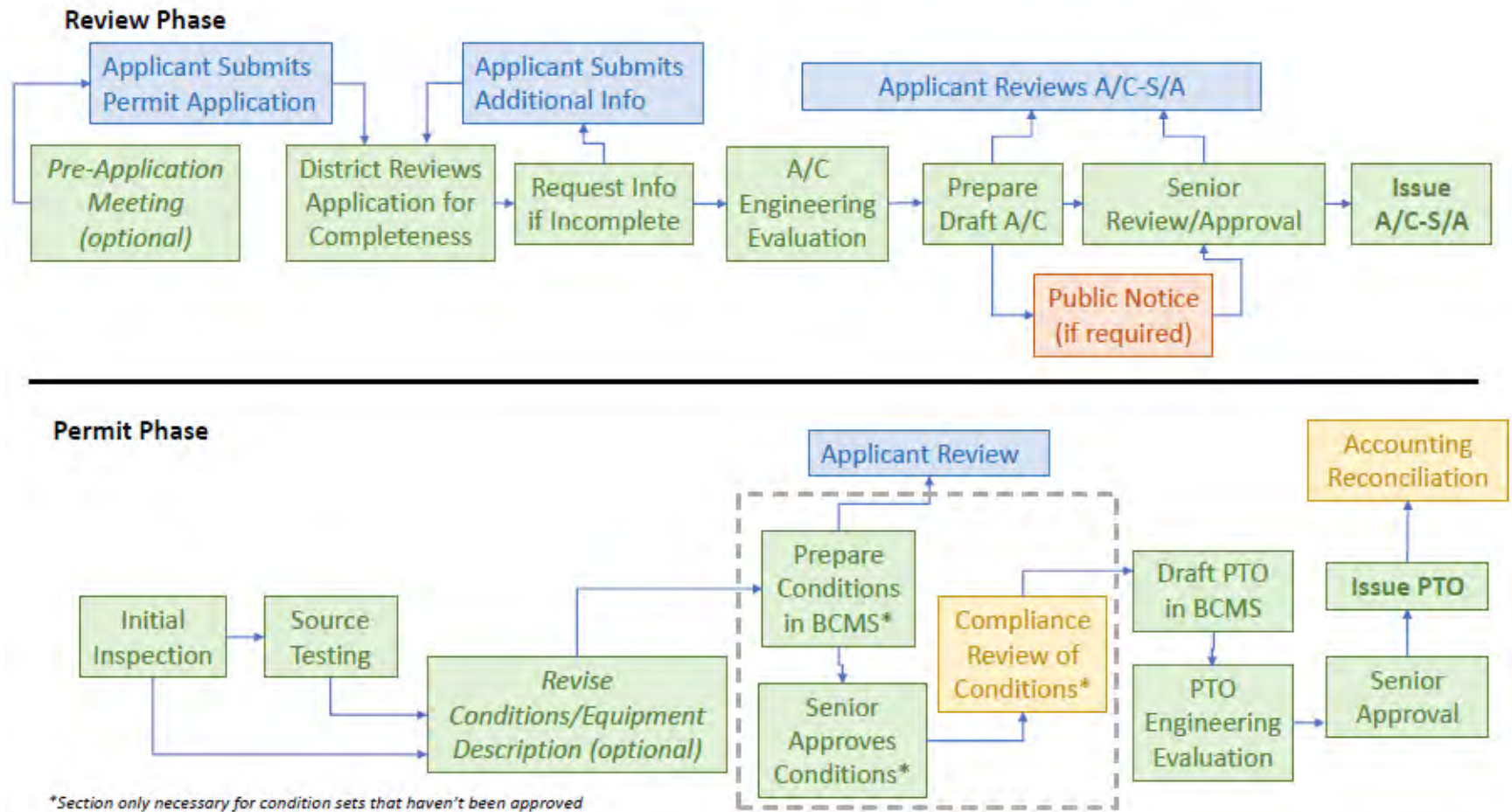


Post-Construction Phase



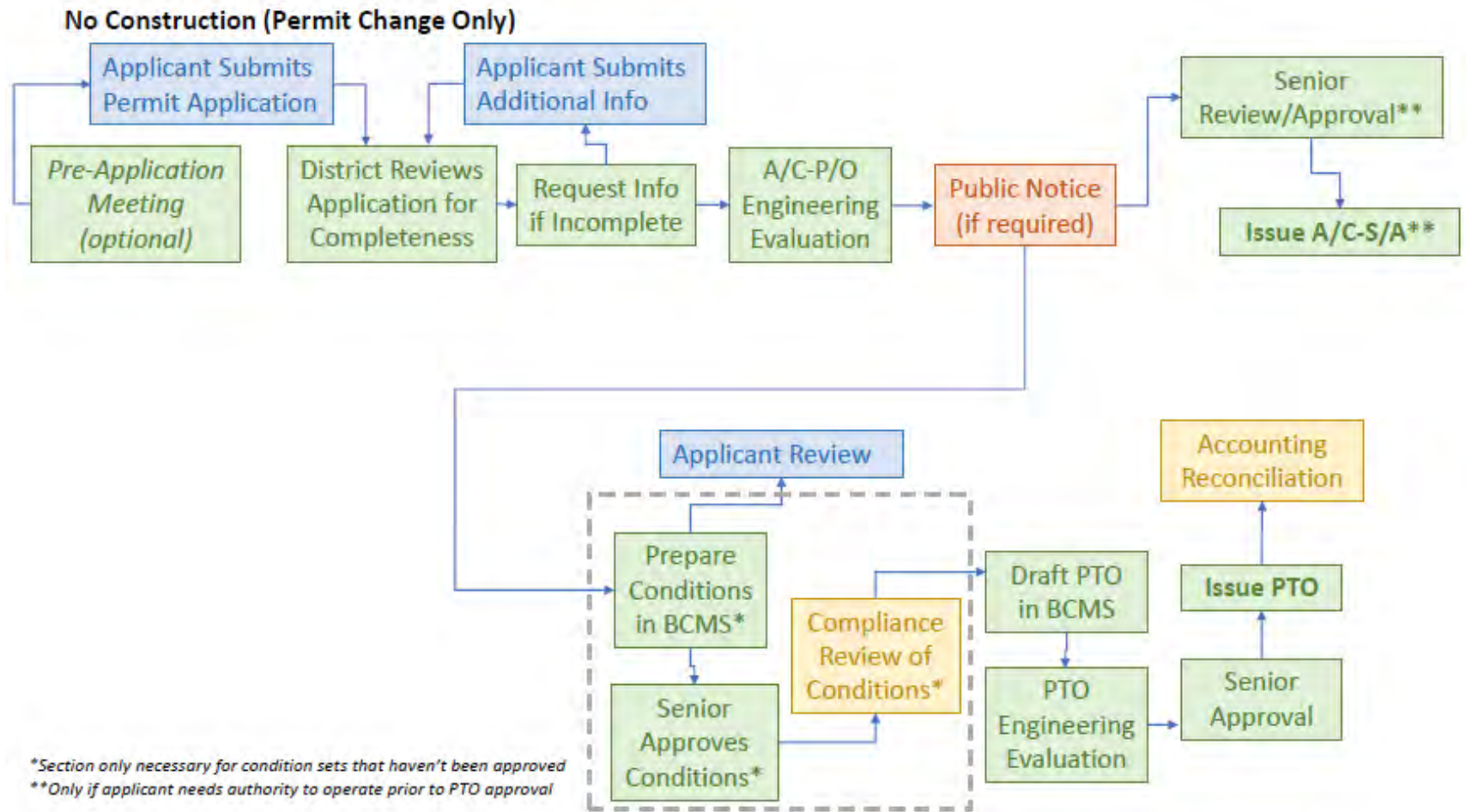
Process flow diagram for standard applications

Engineering Division Manual of Procedures



Process flow diagram for A/C-S/As

Engineering Division Manual of Procedures



Process flow diagram for A/C-P/O

3. Requirements for Issuing Authorities to Construct (A/Cs)

3.1 Permit Evaluation Guidelines (Tom Weeks, October, 2007, revised April 2009, February 2013)

- A. It is very important that application reviews be thoroughly documented. Therefore an engineering evaluation shall be prepared for each application. Engineering evaluations are used by the District to demonstrate to interested parties (ARB, EPA, the facility, the public and other District staff) how compliance with applicable rules and regulations was determined. In addition they explain technical details about the processes and operations under review, document the history of permit reviews and approvals and contain all the necessary background information to support the permit decision. They shall be written so that anyone with a technical background can understand them. Moreover, they should be written so that even the public, without a technical background, can understand the basic reasoning (though they may not understand much of the technical detail).
- B. The engineering evaluation must generally follow the format template included in this section. Where appropriate, boilerplate evaluations may be used for simple equipment as determined by the senior engineer. Engineering Evaluations for some special projects (i.e. Rule 20.5 Determination of Compliance reviews) as well as Title V permit applications may deviate from the format outlined below.
- C. At the time of submittal to the Senior Engineer for permit approval, the application file will be organized as follows:
 - Final Draft Permit to Operate (PTO)
 - Engineering Evaluation (ATC followed by PTO) with attachments
 - Startup Authorization (SA)
 - Construction Completion Notice (CCN)
 - Authority to Construct (ATC)
 - Pertinent correspondence with applicants in chronological order
 - Application Forms (116 and Supplemental)
 - Other application submittals
 - Red folder with confidential information (see MOP section 1.6)
- D. The application, engineering evaluation and the authority to construct shall be identified in the permit file using tabbed pages.
- E. To the extent practicable the engineering evaluation should be a stand-alone document that provides all the relevant information and analyses used in making the permit decision. Each document referenced in the engineering evaluation shall be dated and clearly labeled. The following documents (where applicable) shall be incorporated into the evaluation:

Engineering Division Manual of Procedures

- Emission calculation spreadsheets or summaries
 - Health Risk Assessments (HRA)
 - Air Quality Impact Analysis (AQIA)
 - Source Test Results
- F. The following documents shall be downloaded to Documentum and identified with a file name in accordance with accepted protocols
- Incomplete/Complete letters
 - Engineering Evaluation (ATC followed by PTO) with attachments
 - Startup Authorization (SA)
 - Construction Completion Notice (CCN)
 - Field Inspection documents including pictures
 - Test results
 - Authority to Construct (ATC)
 - Relevant correspondence with applicants in chronological order
- G. Draft and duplicate documents should be purged from the file unless they are necessary to document significant permitting process decisions.

ENGINEERING EVALUATION AUTHORITY TO CONSTRUCT

Facility Name: _____

Application Number: _____

Equipment Type: _____

Facility ID: _____

Equipment Address: _____

Facility Contact: _____

Contact Title: _____

Contact Phone: _____

Permit Engineer: _____

Date Application Received: _____

Date A/C Evaluation Completed: _____

Date Evaluation Modified: _____

Senior Engineer Approval: _____

1.0 BACKGROUND

- 1.1 Type of Application - Is this new equipment, a modification to existing equipment, a change of location, or an amendment to an open application?

Engineering Division Manual of Procedures

- 1.2 Permit History - What is the previous history? For modifications, when was the equipment originally installed and what is the modification history?
 - 1.3 Facility Description - What does the company do at this location? What other permitted equipment is at this location and are there any other open applications?
 - 1.4 Other Background Information (where pertinent) - Has there been any hearing board actions, permit denials, legal settlements, NOV's or nuisance complaints? Is this a Title V facility?
- 2.0 PROCESS DESCRIPTION
- 2.1 Equipment - Describe the new equipment (or how the existing equipment will be modified). Include make and model numbers, serial numbers, capacities etc.
 - 2.2 Process - Describe the process (include specifics such as operating schedule, raw materials, chemical reactions, throughput flowrates, production rates, material balances).
 - 2.3 Emissions Controls – Describe any emission control equipment.
 - 2.4 Attachments - Provide supporting information such as schematics, process flow diagrams or equipment manufacturer's data as attachments.
- 3.0 EMISSIONS
- 3.1 Emission Estimate Summary – The emission estimate summary must include a summary of both Potential to Emit (PTE) and expected emissions increase (to support no net increase calculations). Emissions total shall be presented for new applications and emissions change (post project minus pre-project) shall be presented for modifications.
 - 3.2 Emission Estimate Assumptions - Assumptions used in the emission calculations (such as maximum throughputs, hours of operation etc.) and the basis for those assumptions must be listed.
 - 3.3 Emission Calculations - Emission calculations (including units) should be shown or attached to the evaluations in spreadsheet form. Emission calculations for modifications should include analysis of the emission increase.
 - 3.4 Attachments - References to emission estimate techniques must be provide where appropriate.
- 4.0 APPLICABLE RULES
- 4.1 Prohibitory Rules – List all prohibitory rules that apply to this source category. List the standards of each applicable prohibitory rule and provide an analysis of whether the equipment is expected to comply with the requirement as well as a thorough discussion of the means of compliance.
 - 4.2 NSR – Provide a determination of applicability of NSR requirements. List standard of each applicable NSR rule and provide an analysis of whether the equipment is capable of complying with the requirement as well as information on the means of compliance.

Engineering Division Manual of Procedures

- 4.3 TNSR - Provide a determination of applicability of TNSR. Summarize HRA results where applicable.
 - 4.4 AB3205 – Is this application subject to AB 3205 requirements? State the method of compliance.
 - 4.5 NSPSs, NESHAPs and ATCMs - List all NSPSs, NESHAPs, and ATCMs that apply to this source category. List the standards of each rule and provide an analysis of whether the equipment is expected to comply with the requirement.
 - 4.6 Title V - Is this permit being issued to a TIV site? If so, was the Title V Engineer provided a draft A/C? Describe how the requirements of title V have been satisfied.
 - 4.7 Attachments – Reference and attach all supporting documentation such as AQIA summary, HRA summary, BACT analysis etc.
- 5.0 RECOMMENDATION
Include a statement of whether or not compliance with applicable rules is expected and a recommendation to approve or deny the A/C.
- 6.0 RECOMMENDED A/C CONDITIONS
List all conditions that are recommended to be included in the A/C. State which rule(s) is the basis for each condition. If a standard BEC is used only the BEC need be listed.

ENGINEERING EVALUATION SUMMARY PERMIT TO OPERATE

Facility Name: _____

Application Number: _____

Equipment Type: _____

Facility ID: _____

Equipment Address: _____

Facility Contact: _____

Contact Title: _____

Contact Phone: _____

Permit Engineer: _____

Date Construction Completion Received: _____

Date of Inspection: _____

Date S/A Issued: _____

Date P/O Evaluation Completed: _____

Senior Engineer Approval: _____

Engineering Division Manual of Procedures

7.0 INSPECTION REPORT

Fully document the inspection. Include the name and phone number of your facility contact. Verify that you reviewed and explained the permit conditions with the facility contact. Note any equipment discrepancies or A/C compliance issues. Include a Compliance Inspection Checklist where available. Verify that you issued a startup authorization and attach a copy to this document.

8.0 RECOMMENDED P/O CONDITIONS

Discuss any changes in the condition set from the ATC to the PTO. If a standard BEC is used only the BEC need be listed. Verify that any non-routine conditions or BECs have been reviewed and approved by the Compliance Division per Manual of Procedures section 6.3.

3.2 Requirements for Issuing A/Cs (January 7, 1982)

- A. Applications will be evaluated based on the information submitted by the applicant. Using this information, the project engineer will determine if the equipment and its proposed operation are expected to comply with District requirements. These requirements include Regulations IV (Prohibitions), II (Standards for Granting Permits) and where applicable, Regulations X (NSPS) and XI (NESHAPS). The A/C evaluation will consider all modes (including emergency operation) in which the equipment may be operated unless specific limitations are included to prevent such operation. An A/C will not be issued unless compliance with all applicable regulations is demonstrated.

The engineering staff will not exempt equipment (including equipment used only in case of emergency) from any requirement of any rule. If there are specific problems with the application of certain rules, they will be brought to the attention of the Chief of Engineering.

- B. A/Cs will be issued with conditions to ensure compliance with District requirements. These conditions may limit throughputs, emission concentrations, hours of operation or any other parameter that is appropriate.
- C. Where state law supersedes District requirements, the engineering evaluation and A/C, including conditions, will be based on state requirements. The appropriate section of state law will be referenced in the A/C issuance.
- D. If source testing of equipment must be done before a P/O will be issued, the applicant will be so advised, as a condition of the A/C. The A/C also will note the required fees. The Monitoring and Technical Services Division will provide input regarding source test requirements as either part of the A/C or as an attachment to the A/C. All source test requests will be in writing directed to the chief of monitoring and technical services, through the respective senior engineer. Since the

Engineering Division Manual of Procedures

District must take action within a specified time period, applicants will be encouraged to have testing accomplished as early as possible.

When source testing will be required prior to issuance of a P/O, the A/C will state that within 60 days of completion of construction, testing will be done at the applicant's expense, to verify compliance with the emission limits. A test plan will be submitted for approval to the District in writing at least three weeks prior to emissions testing. A final report will be submitted for approval to the District no more than 30 days following completion of testing. (September 19, 1983)

- F. For all new or modified sources subject to the NSR rules, the engineering evaluation will include a cumulative NSR emissions summary sheet. This also will apply to new or modified permits that have emissions increase below NSR trigger levels but that contribute to a stationary source cumulative emissions increase. The cumulative NSR emissions summary sheet will be part of the permit evaluation documentation. Conclusions relative to NSR applicability and cumulative emissions increases will be documented in the evaluation. (August 11, 1990)

3.3 Creating and Applying Permit Conditions (October 2020, Nick Horres)

After the process description is complete, conditions should be added to the application. Conditions may be added by creating a new condition, applying an existing reference condition (and possibly modifying it), or applying a whole set of conditions that have been approved as a CON record. Typically applying a whole set is the most efficient, applying existing reference conditions is second preference, and creating new conditions is the last step.

A few suggested tips:

- Do not revise existing conditions that you do not intend to change on all permits with the affected condition. Instead create a new condition.
- Do not use special characters that BCMS cannot recognize like smart quotes since these will show up as upside down question marks.
- Pay attention to the listed rule citations. If the correct wording is available but rule reference is not updated, check with your supervisor whether this is okay or perhaps the existing condition should be changed even if on multiple permits.
- When copying conditions from CON records, there is a known glitch that Accela won't address that can result in not all conditions copying over. For this reason, after copying the conditions, check to ensure all conditions correctly copied.

The screen shots below show examples of each of these methods.

Create a New Condition

Engineering Division Manual of Procedures

APCD2020-APP-006206 - Non-Retail Gas Dispensing Facility Fee Sched: 26E EFX

Submit Reset Cancel Help

Go To Summary Record - [26 A E F] GDF Activities Activity Summary Address Addtl Info Calendar Classic Reports Com

Group * [Standard Condition](#) APCD

Type * [Standard Condition](#) PTO Conds

Condition Name * NEW 1

Status Applied(Apply)

Severity [Notice] Notice

Short Comments [Standard Comment](#)
Complete all fields as shown on the top row and name the condition
[check spelling](#)

Applied by User * [Current User](#)
Nicholas Horres

Applied By Division * [Current Division](#)
APCD Engineering Chem

Display Notice [None]
☒ Accela Automation
☒ ACA
☐ ACA Fee Estimate Page
Set Inheritable to "No"

Long Comments [Standard Comment](#)
This is a condition requiring the owner or operator to meet an emission limit that we tell them to. [Rule 21]
Enter the condition language here.
[check spelling](#)

Inheritable [No] * No

Action by Dept [Current Division](#)
--Select--

Action by User [Current User](#)
--Select--

Effective Date
Applied Date
09/30/2020

Search Tags

Add a reference condition
Click Add then "Standard Condition" then "Search"

Submit Reset Cancel Help

Go To Summary Record Activities Activity Summa

Group * [Standard Condition](#) --Select--

Type * [Standard Condition](#) --Select--

Condi

Short Comments [Standard Comment](#)

Engineering Division Manual of Procedures

APCD2020-APP-006206 - Non-Retail Gas Dispensing Facility Fee Sched: 26E EFX

Menu Search Cancel Help

Go To

Showing 1-5 of 100

Condition Name	Type	Comment	Group	Severity
C45189	PTO Conds	C45189-All screens, crushers, and transfer points shall be ...	APCD	Notice
C45188	PTO Conds	C45188-No air contaminant shall be discharged into the atmo...	APCD	Notice
C45187	PTO Conds	C45187-PM10 emissions from this unit, excluding area fugiti...	APCD	Notice
C45190	PTO Conds	C45190-All conveyors shall be covered, or shall utilize an ...	APCD	Notice
C45191	PTO Conds	C45191-The following records shall be maintained at a centr...	APCD	Notice

Page 1 of 20

Now enter the search parameters as shown below. Typically you either search by condition number, or by a wording you are trying to find (use percent signs as needed)

APCD2020-APP-006206 - Non-Retail Gas Dispensing Facility Fee Sched: 26E EFX

Submit Reset Cancel Help

Go To

Condition Name: C42132

Condition Group: --Select--

Condition Type: --Select--

Severity: --Select--

Short Comments

Long Comments: %Emissions of NOx from this equipment shall not exceed 9%

Search Tags

Display Notice

Include In Condition Notice

check spelling

check spelling

check spelling

Alternatively, search for a wording you want to find

Now click submit and check results. Open the conditions in new tabs if needed to check without rerunning search.

Engineering Division Manual of Procedures

APCD2020-APP-006206 - Non-Retail Gas Dispensing Facility Fee Sched: 26E EFX

Menu Search Cancel Help

Go To Summary Record - [26 A E F] GDF Activities Activity Summary Address Addtl Info Calendar Classic Reports Commen

Condition Name	Type	Comment	Group	Severity
C42824	PTO Conds	C42824 - The maximum emissions of NOx shall	APCD	Notice
C26107	PTO Conds	C26107 - The maximum emissions	APCD	Notice
C24633	PTO Conds	C24633 - The maximum emissions of nox	APCD	Notice
C22821	PTO Conds	C22821 - The maximum emissions of NOx shall not	APCD	Notice

If you find multiple conditions, right click on the corresponding icon for the condition you want to view and open in a new tab (otherwise you have to search again)

My Tasks

Once you have found the condition you want, open it in the original tab and submit

APCD2020-APP-006206 - Non-Retail Gas Dispensing Facility Fee Sched: 26E EFX

Submit Reset Cancel Help

Go To Summary Record - [26 A E F] GDF Activities Activity Summary Address Addtl Info Calendar Classic Reports Commen

Group * Standard Condition Type * Standard Condition Condition Name * Status Severity [Notice]

APCD PTO Conds C22821 Applied(Applied) Notice

Short Comments Standard Comment

C22821 - The maximum emissions of NOx shall not

check spelling

Applied by User * Current User

Nicholas Horres

Applied By Division * Current Division

APCD Engineering Chem

Display Notice [None]

☐ Accela Automation

☐ ACA

☐ ACA Fee Estimate Page

Inheritable [No]

No

Action by Dept Current Division

--Select--

Action by User Current User

--Select--

Long Comments Standard Comment

The maximum emissions of NOx shall not exceed 30 PPMV when operated on a gaseous fuel or 40 PPMV when operated on a liquid fuel, calculated as Nitrogen Dioxide at 3% Oxygen, on a dry basis.

Revise a condition (only for conditions only on affected permits)

First add the condition as indicated above, then open the condition and make changes and mark the status as revised.

Engineering Division Manual of Procedures

APCD2020-APP-006206 - Non-Retail Gas Dispensing Facility Fee Sched: 26E EFX

Submit Reset Cancel View Log Help

Condition Detail Condition History

Group * APCD Type * PTO Conds Condition Name * C22821 Status Revised(Not Applied) Severity [Notice] --Select--

Short Comments [Standard Comment](#)
C22821 - The maximum emissions of NOx shall not

[check spelling](#)

Long Comments [Standard Comment](#)
The maximum emissions of NOx shall not exceed 30 PPMV when operated on a gaseous fuel or 40 PPMV when operated on a liquid fuel, calculated as Nitrogen Dioxide at 3% Oxygen, on a dry basis.

Make the change to the wording here

[check spelling](#)

Search Tags
C22821
11225/13A

Set status to Revised

Applied by User * [Current User](#)
Nicholas Horres

Applied By Division * [Current Division](#)
APCD Engineering Chem

Display Notice [None]
☐ Accela Automation
☐ ACA
☐ ACA Fee Estimate Page

Inheritable [No] *
No

Action by Dept [Current Division](#)
--Select--

Action by User [Current User](#)
--Select--

Effective Date
Applied Date
09/30/2020

In this case we should also check whether this legacy BEC is on any other permits which can be done as follows.

Engineering Division Manual of Procedures

Record ID [Alt + R] _% is wildcard **Find permits**

Opened Date From To **St**

Record Type **Use this to speed up search**

Group Type Subtype Category

Contact Organization Name Address Line 1 City Zi

Short Notes Record Name

Assigned to Division [Current Division](#) Assigned to Staff [C](#)

Use these fields to tell it to look in the BEC field, for the indicated number

Record Data

Record Specific Info Label Record Specific Info Value

Record TABLE Data

Record Specific TABLE Label Record Specific Table Value

Task Specific Data

Task Specific Info Label Task Specific Info Value

If either no permits show up (double check search was right) or only permits that are affected show up, it is okay to revise the condition.

Applying a set

This is the most efficient way to apply conditions. To do this, open the CON record and use related records to copy the conditions. Select copy and then enter the application number and check Record Conditions as shown in shot below.

APCD2014-CON-000928

Copy To Record:

Copy To A Set:

Record Specific Information

- ☐ Fee Items [\(Select\)](#)
- ☐ Workflow Status
- ☐ Inspection [\(Select\)](#)
- ☐ Record Specific Info [\(Select\)](#)
- ☐ Additional Info
- ☐ Valuation Calc
- ☐ Workflow Task Specific Information
- ☐ Status or New Status:
- ☐ Status History

General Record Information


- ☐ Record Details [\(Set Application Description\)](#)
- ☐ Parcel
- ☐ Parcel Owner
- ☐ Address
- ☐ Assets
- ☐ Licensed Professionals [\(Select\)](#)
- ☐ Contact [\(Select\)](#)
- ☐ Document
- ☐ Preserve Dates

☒ Record Conditions [\(Select\)](#)

- ☐ Inspection Conditions [\(Select\)](#)
- ☐ Conditions of Approval [\(Select\)](#)
- ☐ Education
- ☐ Continuing Education
- ☐ Examination
- ☐ Record Comments
- ☐ Activities

Engineering Division Manual of Procedures

APCD2020-APP-006206 - Non-Retail Gas Dispensing Facility Fee Sched: 26E EFX

 A notice was added to this record on 2020-09-30.
Condition: Severity: Notice
Total conditions: 1 (Notice: 1)
[View notice](#)

Menu ▾ New **Reorder** Delete View Log Help

Go To ▾ Summary Record - [26 A E F] GDF Activities (0) Activity Summary

<input type="checkbox"/>	Display Order	Condition Name	Long Comments
<input type="checkbox"/>	2	C40239	The engine shall be operated exclusively during...
<input type="checkbox"/>	3	C40907	This engine shall not be used as a part of a no...
<input type="checkbox"/>	4	C28643	Engine operation for maintenance and testing pu...
<input type="checkbox"/>	5	C28412	This engine shall only use CARB diesel fuel. (R...
<input type="checkbox"/>	6	C28413	Visible emissions including crank case smoke sh...
<input type="checkbox"/>	7	C28414	The equipment described above shall not cause o...
<input type="checkbox"/>	8	C28415	This engine shall not operate for non-emergency...
<input type="checkbox"/>	9	C28560	Engine operation in response to notification of...
<input type="checkbox"/>	10	C28419	A non-resettable engine hour meter shall be ins...
<input type="checkbox"/>	11	C43433	The owner or operator of this engine shall inst...
<input type="checkbox"/>	12	C43434	The owner or operator of the engine shall maint...
<input type="checkbox"/>	13	C43431	The owner or operator of this engine shall main...
<input type="checkbox"/>	14	C43432	All records required by this permit shall be ma...
<input type="checkbox"/>	15	CHW001	Access, facilities, utilities and any necessary...
<input type="checkbox"/>	16	CHW002	This Air Pollution Control District Permit does...
<input type="checkbox"/>	17	CHW003	The permittee shall, upon determination of appl...
<input type="checkbox"/>	1	C22821	The maximum emissions of NOx shall not exceed 3...
<input type="checkbox"/>	2	NEW 1	Condition that is new

3.4 Issuance of Authority to Construct Letters

An Authority to Construct letter is to be issued in response to all applications for permits except for the following cases:

- 1) Existing emission unit that was previously exempt from permit under Rule 11 and for which a permit is now required because of a change to Rule 11, or a change in the District's interpretation of Rule 11. This exception does not apply if the

Engineering Division Manual of Procedures

emission unit is being or will be modified, or was previously modified in such a way that the Rule 11 exemption no longer applies.

- 2) An existing emission unit that was previously under a permit to operate and that permit expired, retired or was cancelled and the owner or operator is applying for issuance of a new permit. This exception does not apply if the unit has been, is being or will be relocated or modified from what was previously permitted or if the application for permit is submitted more than **12 months** after the permit was retired or cancelled.
- 3) Modifications to conditions or limitations on an existing permit where there is no physical change to the emission unit or process and no change to the equipment description (other than identical replacement) on the permit. A separate Authority to Construct letter is not required, but may be issued. However, the modification should be evaluated for compliance with all District rules, including NSR and Rule 1200, as if an Authority to Construct were being granted. This includes any procedural requirements such as AB3205 public notice and a public/EPA review and comment period. If, in order to achieve compliance with any rule, the emission unit or process must be physically modified or emission controls added or emission offsets provided, then an Authority to Construct letter must be issued.

When a separate A/C letter is not issued, each Startup Authorization or modified Permit to Operate that authorizes operations under the modified conditions must be issued as a combined A/C-S/A and A/C-P/O, respectively. The document must clearly indicate that it includes the Authority to Construct action. The date of issuance of the first of these should be entered as the A/C issuance date in the VAX.

- 4) Emission units for which an application for registration has been submitted to the District and which are eligible for registration under District Rules 12 and 12.1.

3.5 Authority to Construct Evaluation Language (February 27, 1980)

The Engineering Division typically will issue an A/C prior to construction. Construction may not commence until an A/C is issued. The following language will be part of the A/C:

“This Authority to Construct authorizes temporary operation of the above specified equipment. This temporary Permit to Operate shall take effect upon written notification to the District that construction has been completed in accordance with this Authority to Construct. This temporary Permit to Operate will remain in effect, unless withdrawn or modified by the District and a revised temporary permit (Startup Authorization) is issued or a permit to operate is granted or denied.

“Upon completion or modification in accordance with this Authority to Construct and prior to commencing operation, the applicant must complete and mail, deliver

Engineering Division Manual of Procedures

or fax the enclosed Construction Completion Notice to the District. After mailing, delivering or faxing the notice, the applicant may commence operation of the equipment. Operation must be in compliance with all the conditions of this Authority to Construct and applicable District rules.

“Within ten (10) days after receipt of this Authority to Construct, the applicant may petition the Hearing Board for a hearing on any conditions imposed herein in accordance to Rule 25.

“This Authority to Construct will expire on _____”

3.6 AB3205 Review/Notification Procedures (July 28, 1989, revised April 2009, revised December 2014)

The following requirements for building departments, hazardous materials administering agencies and local air pollution control districts concerning new or modified sources near schools shall be complied with before issuance of an Authority to Construct.

- A. No city or county will issue a building permit for a facility to be constructed (or modified) within 1,000 feet of a school, or issue a certificate of occupancy for any facility, unless the applicant provides proof that the facility is exempt from District permit requirements, or if not exempt, the requirements for District permits are being met.
- B. Before approving an application for a permit to construct or modify a source located within 1,000 feet of a school, the District must:
 - 1) Provide notice of the proposed approval to parents of children attending any schools within one-quarter mile of the source and to each address within 1000 feet of the source.
 - 2) Provide a 30-day period to comment.
 - 3) Review and consider all comments received.
 - 4) Include written responses to the comments in the application file before taking final action on the permit.
- C. If determined that there is a reasonably foreseeable threat of an air contaminant release from a source within 1,000 feet of a school that would cause a violation of Section 41700 of the health and safety code (equivalent to Rule 51) and that would impact persons at the school, the District must notify the appropriate fire department and administering agency (HAZMAT) within 24 hours.
- D. In determining that a reasonably foreseeable threat of a release exists, the air pollution control officer (APCO) may issue an immediate order to prevent or

Engineering Division Manual of Procedures

mitigate the release (with HAZMAT written concurrence) and petition the hearing board to issue an abatement order.

- E. The District must respond to a request from a school principal (for example for the District to identify or take actions to prohibit or mitigate a threatened release) within 24 hours and notify HAZMAT and the fire department having jurisdiction over the school.
- F. EIRs for purchases of school sites or construction of a new school cannot be approved unless the lead agency obtains a list of all sources within one-quarter mile that are expected to emit hazardous or acutely hazardous air emissions from the District.
- G. Full implementation of these requirements will require the cooperation of permit processing, Compliance and engineering staff. Engineering staff will be responsible for implementing substantial portions of these requirements. All engineering staff are affected by these requirements.
- H. An air pollution control questionnaire will be provided to all building departments to give to applicants for building permits and certificates of occupancy. Applicants who may require District permits will need District authorization stamps on the form. The following procedures will be used:
 - 1) Clerical staff will receive forms over the counter or by mail. Clerical staff will maintain a log of the receipt, routing and disposition of all forms received. These forms will not be handled by engineering or Compliance staff without routing through clerical staff.
 - 2) If there is no application on file with the District for the equipment for which the person is seeking a building permit or certificate of occupancy, the form will be forwarded to the Compliance division for handling. Forms also will be forwarded to Compliance staff if any application on file clearly is not for the equipment for which the building permit or certificate of occupancy is being sought.
 - 3) If there are applications on file with the District that are or may be for the equipment, the form will be forwarded to the appropriate senior engineer for assignment to an engineer.
 - 4) The engineer assigned will determine if the pending applications are for the equipment. If not, the form will be forwarded through clerical to Compliance staff for disposition.
 - 5) If an application is pending for the equipment for which a building permit or certificate of occupancy is sought, the second block will receive a confirming stamp by the senior engineer, whether or not the application has been deemed

Engineering Division Manual of Procedures

complete; the third block will receive a confirming stamp only if an A/C has been issued for the specific source, building, process or equipment for which the certificate of occupancy is being sought.

- 6) Stamped forms will be forwarded to permit processing for mailing/delivery to applicants. A copy will be made by permit processing staff and retained in the application file.
 - 7) If there is not sufficient information on the questionnaire to determine whether there is a corresponding application on file with the District, the engineer will contact the applicant to obtain the necessary information, document the information received and proceed with the disposition of the form.
- I. All pending and new applications for A/Cs must be screened to determine whether they fall within 1,000 feet of the outer boundary of a school. Schools include K-12, public, private and also may include certified in-home study. Maps that locate all schools have been prepared.
 - J. Applications pending issuance of a permit for equipment for which an A/C already has been issued are not subject to the AB3205 public notification process. This also applies in cases where a source has allowed its permit to lapse and must reapply for a new permit (without a change in location).
 - K. All new applications for A/Cs or modifications to permits that require an A/C, except those for change of ownership will be reviewed by the project engineer for mapping prior to determining whether an application is complete.
 - L. The review is to determine if a source may be within 1,000 feet of the outer boundaries of a school and to identify schools within 1,320 feet of the source. For each source that may be within 1,000 feet of a school, the engineer will advise the applicant of the public notice and comment period requirements of AB3205 and request the applicant to provide a map showing the exact location of the equipment and the associated discharge vent/stack, the location of the property lines of the stationary source on which the equipment is located and the location of the property boundaries of any schools located within 1,320 feet of the source.
 - M. Upon receiving this information, the project engineer will determine if the equipment or its associated discharge points are located within 1,000 feet of the outer boundaries of a school. If so, the project engineer will complete a draft public notice for signing by the senior engineer once a preliminary decision has been made to issue an A/C. This notice will identify (by name and address) all schools within one-quarter mile (1,320 feet) of the discharge points. (This distance will be measured from the discharge point, or equipment location to the outer boundaries of any neighboring schools.) The project engineer will attach a map to the draft notice showing, in red, the boundary that defines a distance of 750 feet from the property lines of the source.

Engineering Division Manual of Procedures

- O. Because of the delays in this process, (approximately six weeks from draft notice to end of comment period), notices will be sent as soon as possible in the application review process provided there is a reasonable expectation that an A/C will be granted. Routine applications, such as for dry-cleaners, gas stations, automotive refinishing facilities, etc. will be reviewed for notification requirements as soon as received and the notices sent out early on so that the comment period can coincide with the engineering evaluation. More complex applications will wait until the application is complete, the process is known and emissions are established in order to be responsive to the public inquiries that the notices may prompt. The AB3205 comment period for projects that trigger air quality analysis under Rule 20.3 will coincide with the 30-day comment period required by Rule 20.3.
- P. The draft public notice, with map, will be forwarded to permit processing, finalizing the notice and initiating the mailing. The map will be used by a contract-mailing firm to define the addresses to receive the public notice. At the time of the mailing, the application file will be in a suitable form for public inspection, as there may be such requests.
- Q. Permit processing also will contact the affected schools to arrange the required mailing to pupils' parents. The notices will be received approximately two weeks after a draft notice and map is forwarded to permit processing. Applicants will be advised that the comment period will take approximately six weeks from when the draft notice is sent to permit processing. Applicants will be sent a copy of the notice by permit processing. A copy also will be sent to the project engineer for the application file.
- R. During the 30-day comment period, the engineer will review and prepare responses to comments as they are received. The comments and response must be contained in a single document with a format similar to workshop reports. The comment/response document will be reviewed and approved by the senior engineer and placed in the application file after the close of the 30-day comment period. The comment/response document will be retained in the application file permanently. The District will consider all comments before taking final action on the permit.
- S. Each individual who provided comments with his name and address will be sent a copy of the comment/response document. The project engineer will provide a mailing list and copy of the comment/response document to permit processing for mailing. If possible, student workers will prepare the mailing lists.
- T. If the public comment period will impact adherence to AB884/Rule 18 deadlines, the applicant will be advised in writing and asked to concur with an extension as necessary. If the applicant will not provide written concurrence, the application will be denied.

Engineering Division Manual of Procedures

- U. When there is a pending application, time spent meeting these requirements will be charged to that application.

3.8 Rule Applicability – New Rule Adoption (January 8, 1982)

Rule 20 specifies that an A/C cannot be issued unless an applicant demonstrates compliance with all applicable rules. Thus, if new or modified rules become effective after an application has been deemed complete, compliance with them must be demonstrated or the A/C cannot be issued. Compliance will be demonstrated at the time the A/C is issued.

If a pending rule change could potentially prevent an A/C from being issued, the applicant will be notified as soon as possible of the rule proposal and the fact that, if adopted, additional requirements must be met before an A/C can be issued.

Any instance where a rule change would cause an extreme hardship to the applicant who submitted a completed application prior to the rule change date but will not receive an A/C prior to that date, will be brought to the attention of the chief of engineering and the deputy director.

An application for an A/C will be subject to evaluation under all rules and regulations that are in force up until the time the A/C is issued. Such rules and regulations will include any that are adopted after the application has been deemed complete. (September 23, 1980)

3.9 Expedited Application Processing Procedure (Tom Weeks, September 1, 2004)

On June 23, 2004 the Board approved revisions to Rule 40 that include provisions for Expedited Application Processing. The following procedures are to be used to implement the program.

Application Receipt – Applicants must specifically request expedited application processing by checking the appropriate box on the District general application Form 116. This action initiates the expedited process. Permit Processing staff will ensure that these applications are forwarded to the appropriate Senior Engineer within one working day of receipt. The permit file folders should be clearly marked so that the application can be given special attention when received by the Senior Engineer.

Engineering Evaluation - The Senior Engineer will evaluate the availability of a qualified permitting engineer as soon as possible after receipt of the application. A qualified permitting engineer would meet the following requirements: 1) they would have experience processing similar applications, and; 2) they would be available to work on the application during a weekend, days-off or after normal work hours within two weeks of receipt of the application. To ensure that these applications are processed in an

Engineering Division Manual of Procedures

accurate and efficient manner, most of the application evaluation time should be during weekends or days-off as opposed to after hours work when the engineer may not be working at full efficiency.

If a qualified permitting engineer is not available, the Senior Engineer will contact the applicant, in a timely manner, to inform them that the application will not receive expedited processing. In the event that the evaluation cannot be expedited, the Senior Engineer should make every effort, as with any application, to meet the applicant's requested timeline through use of normal staff resources and scheduling.

If a qualified permitting engineer is available, the Senior Engineer will transfer the application to the engineer for a completeness determination. The permitting engineer will review the application and make a determination whether sufficient information is available to begin processing the application. If necessary, the permitting engineer should contact the applicant to request additional information. Requests for additional information may be made by phone, however an application status letter must also be issued within 30-days of receipt of the application. The permitting engineer will also inform the applicant that the application will receive expedited processing and discuss the evaluation review timeline to ensure that it meets the applicant's needs prior to working overtime.

Application Cost Accounting – Upon issuance of an Authority to Construct, the permitting engineer will submit, to the Accounting section via the Senior Engineer, a request for an invoice for the expedited application processing fee. Expedited permit processing fees would be charged only if the majority of the work done on the application was performed on weekends, after hours or on days off.

For fixed fee applications the expedited application processing fees will be equal to 0.25 times the Initial Evaluation Fee minus the Emission Unit Renewal Fee (Column (1) minus (2)) plus any Additional Engineering Evaluation Fees as specified in Rule (40)(d)(5). The non-refundable processing fee, renewal fee, and any applicable air contaminant emissions fees will be charged at the standard rate as specified in Rule 40.

For T&M applications, an expedited permit application fee equal to 0.25 times the normal Rule 40 Fee Schedule 91 labor rate will be charged for all labor prior to issuance of the Authority to Construct. If additional overtime work is required for issuance of the Startup Authorization and or Permit to Operate a second supplemental invoice shall be issued to cover this labor. The non-refundable processing fee, renewal fee, and any applicable air contaminant emissions fees will be charged at the standard rate as specified in Rule 40.

Invoices shall be prepared by the permit engineer for review and approval by the Senior engineer prior to submittal to Accounting. Invoices should specify that they are for recovery of expedited application processing fees per District Rule 40(d)(8)(iv). Account code 73 should be specified on the request for invoice.

Engineering Division Manual of Procedures

If an application is denied or cancelled prior to issuance of an A/C, the Senior Engineer or the Chief of Engineering should be consulted to determine if expedited processing fees are to be applied.

Application Time Accounting – The District will re-evaluate the expedited application processing labor cost multiplier periodically to determine if it accurately reflects additional labor costs for implementation of the program. To do this it will be necessary to track overtime labor hours. Initially, Senior Engineers will be asked to track the number of overtime labor hours spent specifically on expedited applications. If the need arises, a special labor code will be developed to facilitate this tracking.

Overtime should be coded at paid overtime (PF) on daily and weekly time sheets.

Addition to Form 116

Expedited Application Processing:

- I hereby request Expedited Application Processing and understand that:
 - a) Expedited Application Processing will incur additional fees and permits will not be issued until the additional fees are paid in full. (see Rule 40(d)(8)(iv) for details).
 - b) Expedited Application Processing is contingent on the availability of qualified staff.
 - c) This request is not cancelable once engineering review has begun.
 - d) Expedited Application Processing does not guarantee action by any specific date nor does it guarantee permit approval.

3.10 Supplemental Expedited Application Processing Guidance (Tom Weeks, October 2005, modified April 2009)

The intent of the expedited application processing program was to reduce application backlog and offer a mechanism for issuing expedited permits. Although the program has been quite successful a few issues have come up that need to be addressed. Those issues are discussed below:

Paid Overtime Criteria - In order for the program to work as intended, additional permit evaluation hours must be generated without increasing staff levels. That allows the District to issue expedited permits without causing delays in issuance of normal (non-expedited) applications. Overtime pay provides the incentive to generate additional permit evaluation hours. However, if staff work paid overtime during the same week that they take leave time (comp. time or vacation), the net effect is that no additional permit evaluation hours are generated. This could result in non-expedited applications taking longer because expedited applications are taking precedence. Therefore, in order to ensure that the program operates as intended, expedited application labor should only be charged on weeks that the employee works a full 40 hours and the employee has a minimum of 20 billable application hours during the normal 40 hour work week unless a deviation is approved by a Senior Engineer or the Chief of Engineering.

Engineering Division Manual of Procedures

Timeliness of A/C Issuance - It is important that the District meet the expectations of the applicant when processing expedited applications. In general, expedited applications should be processed within two weeks of receipt. If this is not possible due to the complexity of the project, the applicant must be contacted. The permit engineer must estimate the A/C issuance date and discuss it with the applicant to ensure that the proposed A/C issuance date is acceptable. Some applicants may decide that the expedited application option is of little value given the extended timelines inherent in some district processes (AB3205, 30-day public notice, refined HRA, AQIA etc). This discussion (including the estimated completion date and the applicant's approval to proceed on an expedited basis) must be documented in writing in the permit file.

Work Hours Limitation - Applicants for expedited permits pay a premium for that service. In return they deserve not only timely service but also quality work. We all lose efficiency and accuracy when we are tired. Therefore, to ensure that applicants receive the quality they deserve, work should not exceed 12 hours during any workday without prior approval of a Senior Engineer or the Chief of Engineering.

Fee-for-Service - The District operates on a fee-for-service basis. Fees charged by the District are intended to recover actual costs only. Rule 40 essentially specifies that expedited applications are charged a fee of 125% of the standard application processing fee. The additional 25% goes to pay the overtime salary of the engineer. If the engineer works paid overtime for only a small portion of the total time spent on an application, the District will recover significantly more in fees than it costs the District to process the application. This would not be consistent with the fee-for-service mandate. Therefore, as specified in the original expedited permit processing guidance, applications should not be accepted as an expedited application and overtime should not be charged unless the permit engineer intends to work on an application primarily (more than 50%) on weekends, days off, or after hours (subject to the work hour limitations specified above).

In the future, engineers must ensure that all the program criteria (as specified in the original program implementation guidance and this supplemental guidance) will be met prior to working overtime on any expedited application.

3.11 Application Tracking Data (November 8, 1993)

Part of our efforts to streamline permit processing involves creating systems by which we can measure and track our progress in making improvements. As a benchmark to evaluate future progress, we have been compiling and reviewing data on the time and labor hours it takes to determine an application complete, to issue an A/C and to issue a P/O. The data on time to process applications is being drawn from the information that permit engineers enter in the application and permit files in the permit database.

Accordingly, engineering staff working on permits are to enter these data in the fields of the application and permit computer files. In particular, the dates when the application is

Engineering Division Manual of Procedures

deemed complete, when an Authority to Construct is issued, when the initial Startup Authorization is issued and when the Permit to Operate is approved must be completed. As designated appropriate by the Section Senior Engineer, data may be entered by the project engineer, by the Senior Engineer or by a student worker.

A. Application Complete

If the application is complete on initial review, then the date of this determination is to be entered in the appropriate field.

If the application is incomplete and the applicant is advised of the additional information needed within 30 days of receipt of the application, then the date the applicant is notified is to be entered in appropriate field. When all information requested within the first 30 days is provided, the date when the last of the information is received is to be entered in appropriate field.

If no determination of whether an application is complete is made within 30 days of receipt of the application, then the date which is 31 days after receipt of the application is to be entered in appropriate field.

B. Authority to Construct

The date of the signed letter granting or denying the Authority to Construct is to be entered in the appropriate field. These Fields are not to be completed until after the letter granting or denying the Authority to Construct is signed.

If the application is for off-the-shelf, portable or already constructed equipment, and a separate Authority to Construct letter will not be issued, the date of the first Startup Authorization granted is also to be entered as the Authority to Construct date in the appropriate field. (The Startup Authorization should be modified to state that it is an Authority to Construct and Startup Authorization.)

If a separate Authority to Construct is not issued but a permit to operate is denied, with no Startup Authorization issued, the date of the letter denying the permit is to be entered as the Authority to Construct action date in the appropriate field.

C. Startup Authorization

The date of the first startup authorization granted pursuant to the application is to be entered in the appropriate field. This applies whether or not the S/A is for shakedown and testing or allowing operation until a permit is issued. If subsequent S/A's are issued, this date is not to be revised without a Senior Engineer's approval.

If subsequent S/A's are granted, the expiration date is to be updated. Do not update the S/A granted field.

Engineering Division Manual of Procedures

D. Permit to Operate/Application Disposition

The date of P/O issuance is to be entered in the appropriate field.

Completing these data entry fields is important if we are to be successful in identifying areas where we need to make improvement and documenting our progress. Completing these fields, at the appropriate time, is also important to the timely processing of applications and permits.

3.12 Verbal Permits Not Allowed (December 18, 1979)

No verbal A/Cs or P/Os will be given for any reason. If a source is being built or modified without an A/C or being operated without a P/O, the senior duty inspector for that day will be notified in writing (copy to engineering file).

3.13 Application Cancellations (November 1990)

When planning to cancel an application that was initiated by a Compliance action, the project engineer first will discuss the cancellation with one of the inspector III's or with the Chief of Compliance. This will prevent the problem of engineering staff canceling an application for a permit that was prompted by Compliance action, i.e. a Notice to Apply or Notice of Violation. This action will prevent Compliance staff from following up on the N/A or N/V with the site, only to be told by the applicant that engineering staff canceled the application because a permit was not needed.

3.14 A/C Requiring Emission Source Testing (October 20, 1992)

There have been several occasions recently where the source testing requirements for new or modified sources have not been adequately coordinated with Monitoring and Technical Services, especially with regards to requirements for access and platforms for testing. This has resulted in the District having to require sources to modify stacks, install or modify test ports or install scaffolding or testing platforms after construction of the permitted equipment/emission controls has been completed. This can be a significant additional expense and delay for applicants that can easily be prevented.

All Authorities to Construct which contain conditions requiring emissions source testing shall also include the following standard condition:

- The (equipment identification or reference) exhaust(s) shall be equipped with a circular exhaust stack with test ports and provisions for personnel access (e.g., scaffolding, platforms) for source testing. The stack design with the locations of test ports, access provisions, platforms, etc. shall be submitted to, and approved by, the District's Monitoring and Technical Services Division (Source Test Section, 694-3349) prior to issuance of Startup Authorization(s) for this equipment

Engineering Division Manual of Procedures

- This will be in addition to the standard condition which requires submission and approval of a source test protocol, such as follows:
- Within (sixty) days after completion of construction, source tests of (equipment identification or reference) shall be conducted by an independent tester at the applicant's expense to determine (compliance with Condition Nos. X, Y and Z/exhaust concentration of NO_x/emission rate of VOCI etc.). A source test protocol shall be submitted to, and approved by, the District's Monitoring and Technical Services Division prior to issuance of Startup Authorizations for this equipment. The applicant should allow 30 days for source test protocol approval and should contact the Source Test Section at 694-3349 with any questions regarding the submission or approval of a test protocol.

3.15 Independent Source Test Contractor Policy (January 29, 1999)

The San Diego APCD requires certain sites to be source tested to determine if they are in compliance with their Permit to Operate emission limits. These tests may be performed by the District's Source Test Section or by an independent source test contractor.

- A. An independent source test contractor is any person or company who conducts a source test at a site for the purpose of furnishing data to the Air Pollution Control Officer, the Air Resources Board or the Environmental Protection Agency for demonstrating compliance with permit conditions or with District Rules and Regulations provided that all of the following criteria are met:
- The independent contractor has no financial interest in the source being tested, or in the source's parent company, or in any subsidiary thereof;
 - The source being tested, or parent company, or any subsidiary thereof has no financial interest in the independent contractor;
 - The independent contractor is not in partnership with, nor owns or is owned by, in full or in part, the contractor who has provided or installed basic control equipment, or monitoring systems, or is providing maintenance for installed equipment or monitoring systems for the source being tested;
 - The independent contractor is not in partnership with, nor owns or is owned by, in full or in part, the consultant or agent representing the source being tested or its group association;
 - No company or facility responsible for the emission of significant quantities of air pollutants, or parent company or any subsidiary thereof, shall have any financial interest in the independent contractor.

An independent source test contractor shall provide satisfactory evidence and a certification that it meets the above criteria with respect to the source(s) being tested, any parent company or subsidiary, consultants or agents.

Engineering Division Manual of Procedures

Test contractors shall, in all cases, be subject to the approval of the District. The District may, as its sole discretion, determine that a test contractor does not qualify as an independent source test contractor for a particular source or for all sources.

The most recent ARB Independent Source Test Contractor List is available on the “S” Drive in the Engineering folder. The list has been modified by the addition of some testers who often test here, but who are not on the ARB list.

The program is designed to approve independent contractors for sources who may choose to have them conduct compliance testing instead of the Air Resources Board. *The Air Resources Board does not require that contractors be approved prior to testing in California.* Approval is only required by the Air Resources Board if the contractor wishes to test under this program. The District has added some testers who have regularly tested in the District, but who do not appear on the ARB list.

3.16 Emission Factors and Calculation Methodologies (Tom Weeks, October 5, 2000)

Emission factors and emission estimation techniques are provided on the following link to the District's Website:

<http://www.sdapcd.co.san-diego.ca.us/emission/emission.htm>

This information was put together by the District's Toxic Section and is based on work they reviewed and approved. Listed emission factors should be considered as default values. Accordingly, they should be used and quoted only when no other emission factor (AP-42, source-specific source testing, etc.) is available. When used, consideration should be given to the development, during the evaluation process, of specific emission factors for significant sources.

All emission factors and assumptions need to be properly referenced and documented in all your evaluation work.

3.17 Permit Conditions for AB2588 Air Toxic “Hot Spots” (August 21, 1989)

The following condition will be included as a “hardwired” condition in all S/As and P/Os for new or modified sources to comply with H&SC requirements:

The Permittee shall, upon determination of applicability and with written notification by the District, comply with all applicable requirements of the air toxics “Hot Spots” Information and Assessment Act (California Health and safety Code Section 33200 ET. SEQ.)

3.18 Permit Application Checklists (May 6, 1999)

Engineering Division Manual of Procedures

Engineering has several application checklists to improve the completeness of permit application submittals and to help the applicants in the process. These checklists include the following:

- General Permit Application Checklist. This should be provided with all general permit application forms.
- Schedule 13 supplemental Permit Application Checklist. This should be provided with all fee schedule 13 supplemental forms.
- Schedule 27 Supplemental Permit Application Checklist. This should be provided with all fee schedules 27 supplemental forms.
- Schedule 28 Supplemental Permit Application Checklist. This should be provided with all fee schedules 28 supplemental forms.
- Schedule 34 Supplemental Permit Application Checklist. This should be provided with all fee schedules 34 supplemental forms. (Do not include with registration forms.)

3.19 Agricultural Exemptions from P/Os (October 16, 1974)

Pursuant to health and safety code Section 24265, permits are not required for boilers and soil mixers used by nurseries in the raising of flowers. According to health and safety code section 24251(c), the equipment is used in an agricultural operation.

3.20 Tank Truck Exemptions from P/Os (September 29, 1977)

P/Os are not required for tank trucks after January 1, 1978, the effective date for AB1238.

3.21 A/Cs Required for Portable Equipment (November 9, 1976)

A/Cs will be required for all appropriate equipment (including portable) prior to purchase so that both the District and the purchaser of the equipment can be assured of compliance with District rules and regulations.

3.22 Basis for Permit Conditions

District Rule 21 gives the District broad authority to impose conditions on permit as necessary to ensure compliance with all applicable requirements. However as operating requirements become more complex with the addition of new and revised State Federal and District requirements, it can be difficult to determine the basis for permit conditions.

For a variety of reasons, it is advantageous to know the basis of each condition on a permit. These reasons include justifying the conditions to the applicant upon request, assisting the Compliance Division in performing inspections, and identifying conditions requiring revision based on rule changes.

Engineering Division Manual of Procedures

Therefore all new conditions must include a reference to the rule basis for that condition. This will be accomplished by appending the specific rule reference as shown in the examples below:

This diesel internal combustion engine shall not be operated more than 50 minutes per day for maintenance and testing purposes. [Rule 20.2(d)(1)]

This diesel internal combustion engine shall not be operated more than 20 hours per calendar year for maintenance and testing purposes. [Stationary Diesel Engine ATCM Subsection (e)(2)(B)]

The permittee shall not use hexavalent chromium (chromium 6) or cadmium containing coating in any motor vehicle or mobile equipment refinishing operation. [Title 17 CCR, Section 93112]

The control device shall reduce ethylene oxide emissions for each sterilizer exhaust by at least 99.9% by weight [ETO ATCM Part 2, Subsection (D)]

3.23 Periodic Source Testing Guidance (Tom Weeks, June, 2011)

Periodic source testing is a useful tool for determining ongoing compliance with applicable emission limitations and other requirements. District rules specify testing frequency for some sources categories. These categories include: Electrical Generating Steam Boilers (Rule 69), Industrial and Commercial Boilers, Process Heaters and Steam Generators (Rule 69.2), Stationary Gas Turbines Engines (69.3.1) and Stationary Reciprocating Internal Combustion Engines (69.4.1).

For other source categories, source test frequency is not specified by rule and will vary based on a number of considerations. This guidance is intended to establish general criteria for use in determining appropriate and consistent test frequency for these sources.

Test Frequency Considerations

As a general guideline, sources with an uncontrolled potential to emit greater than 5 tons per year of criteria pollutants, should be tested every two years. Five ton sources have significant emission potential and periodic testing also helps ensure accurate emission fee calculation. Other factors that can be considered when establishing test frequency are:

- Reliability and Maintenance Requirements of Proposed Emission Controls – sources that use controls that have high maintenance requirements or are prone to failure may warrant more frequent testing. Conversely sources with reliable, low maintenance, controls may require less frequent testing.
- Required Level of Emission Control - Sources that rely on very high control efficiency to maintain compliance may warrant more frequent testing.

Engineering Division Manual of Procedures

Conversely sources that can comply with a lower than anticipated control level may require less frequent testing.

- Facility Compliance History – New sources at existing facilities that have a history of non-compliance may warrant more frequent testing.
- Potential for Nuisance – Sources that have a high potential for nuisance due to odor or dust emissions may warrant more frequent testing.
- Potential Emission Level - Sources that exceed or have the potential to exceed major source thresholds may warrant more frequent testing.
- Accuracy and Reliability of Parametric Monitoring or Recordkeeping to Determine Ongoing Compliance – Sources which have accurate and reliable means of verifying compliance using parametric monitors and/or recordkeeping may not require testing or may warrant less frequent testing. For example, an uncontrolled VOC source that can demonstrate compliance based on usage records and a material mass balance may not require testing.
- Potential for Ancillary Toxic Emission Risks – Sources with emissions that are close to a Rule 1200 threshold and/or rely on high levels of control to mitigate risk may warrant more frequent testing.

Permit engineers should address these considerations and document their recommendation in the engineering evaluations for review by the Senior Engineer. The Monitoring Division should be consulted concerning technical issues, logistics and resources, as necessary, prior to making a test frequency recommendation. The Compliance Division will review and have an opportunity to comment on the proposed source test frequency during their condition review.

3.24 BCMS steps for issuing an A/C (October, 2020)

In addition to adding conditions as described previously in these procedures, the equipment description needs to be entered in BCMS prior to issuing the A/C. Contacts also may need to be added or updated. Once approved the A/C is also issued from BCMS and then electronically signed.

Adding the Equipment Description

Once the evaluation is prepared, you can prepare the A/C (or some parts can be done simultaneously). The first step is to complete the process description task.

Engineering Division Manual of Procedures

Process Description

There currently are no ad hoc tasks defined.

Process

The equipment description should be entered here that will show up on the A/C

Equipment Description

A process that emits air contaminants consisting of:

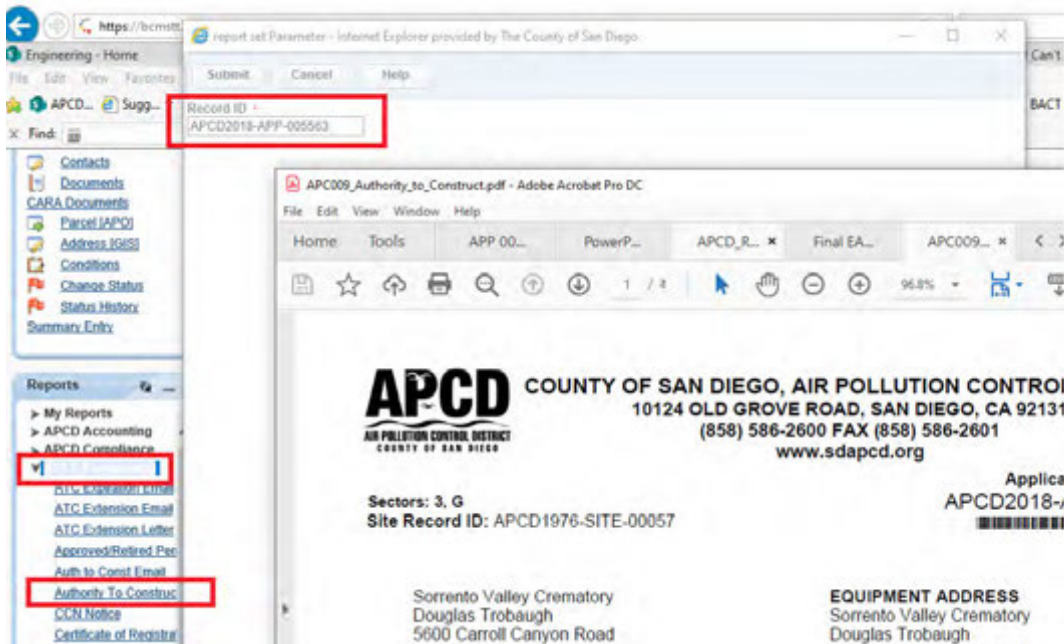
One blaster booth
Two engine machines, manufacturer unknown, model ABC, S/Ns 038603860 & 030sj380
Five Ovens, make Easy, model Bake, each with a 0.1 MMBtu/hr ultra dry low NOx combustors
Various welding tools using chrome free rods

All emissions vented to a custom, quad catalytic filtration concentrator manufactured by Magic, model 1, 100,000 cfm, S/N \$#()_+*Q\$

Run the A/C report and update contacts if necessary

The A/C report is in the reports section under engineering. Open the dialogue box and click submit to generate the report.

Engineering Division Manual of Procedures



The A/C report requires that the equipment description and A/C contacts exist in the record. If there is an error in the report, check that these are entered and if not add them or ask the engineering aide to add.

APCD2020-APP-006206 - Non-Retail Gas Dispensing Facility Fee Sched: 26E EFX

A notice was added to this record on 2020-09-30.
Condition: Severity: Notice
Total conditions: 1 (Notice: 1)
[View notice](#)

Menu Manage Contacts View Log Help

Go To Summary Record - [26 A E F] GDF Activities (0) Activity Summary (2) Address (1) Addtl Info Calendar Classic

Contact ID	Type	First Name	Last Name	Org Name	Address Line 1
<input type="checkbox"/> 64847024	APCD ATC Mailing			United Rentals (North A...	791 East 64th Ave
<input type="checkbox"/> 64847028	APCD Equipment Location	Kevin	Hubbard	United Rentals (North A...	501 C St
<input type="checkbox"/> 64847027	APCD Equipment Owner			United Rentals (North A...	100 First Stamford Pl, S...
<input type="checkbox"/> 64847025	APCD Invoice Mailing	Accounts	Payable	United Rentals (North A...	791 East 64th Ave
<input type="checkbox"/> 64847026	APCD PTO Mailing	General	Manager	United Rentals (North A...	501 C St

Issuing the A/C

Once the application is approved, the A/C is issued through BCMS. Complete the following fields in the issue A/C task, complete it and then the A/C report can be ran.

Engineering Division Manual of Procedures

Completteness Determination
Background Analysis
Process Description
Emissions Calculations
Dist Prohibitory Rule Analysis
Dist NSR Rules Analysis
AQIA
Toxic NSR Rules Analysis
AB3205 Review and Notification
ATC Recommendations_Conditions
State and Federal Regulations
Approve Authority to Construct
Issue Authority to Construct
Construction Completion Notice
Field Inspection
Issue Startup Authorization
Source Test
PTO Recommendations_Conditions
Approve Permit to Operate
Issue Permit to Operate
Accounting Reconciliation

Currently are no ad hoc tasks defined.

New Status (Alt + S) [ACA] *
Complete

Hours Spent (Alt + H) *
0.5

Status Date *
10/07/2020

Comments [ACA]
Standard Comment
issue A/C, send to applicant and documentation

Set status to complete, add time, and enter comments on work done.

check spelling

Authority to Construct Information

ATC Issued *
☒ Yes ☐ No

INITIAL Authority to Construct Issue Date
10/07/2020

Authority to Construct Expiration Date
10/07/2021

Real Time Accounting Code will assess, invoice and pay Fees based on whether the specific Task is Billable, your Title (Labor Rate) and the available balance in relevant Trust Accounts.

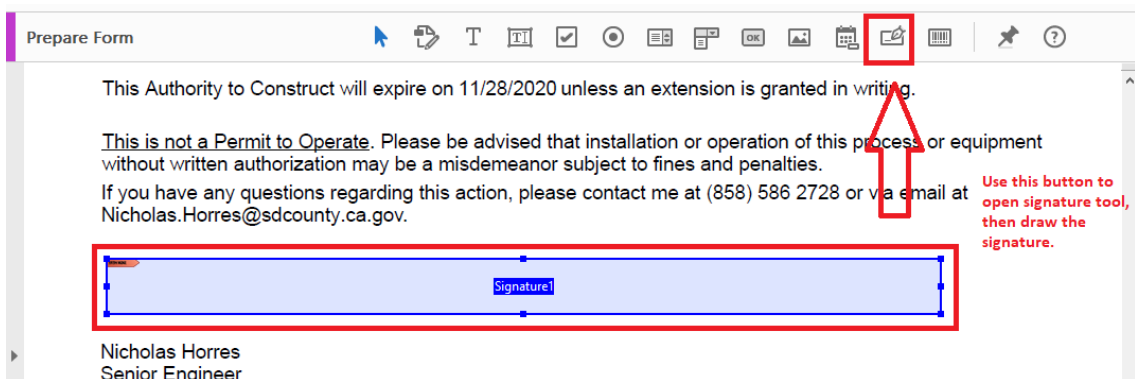
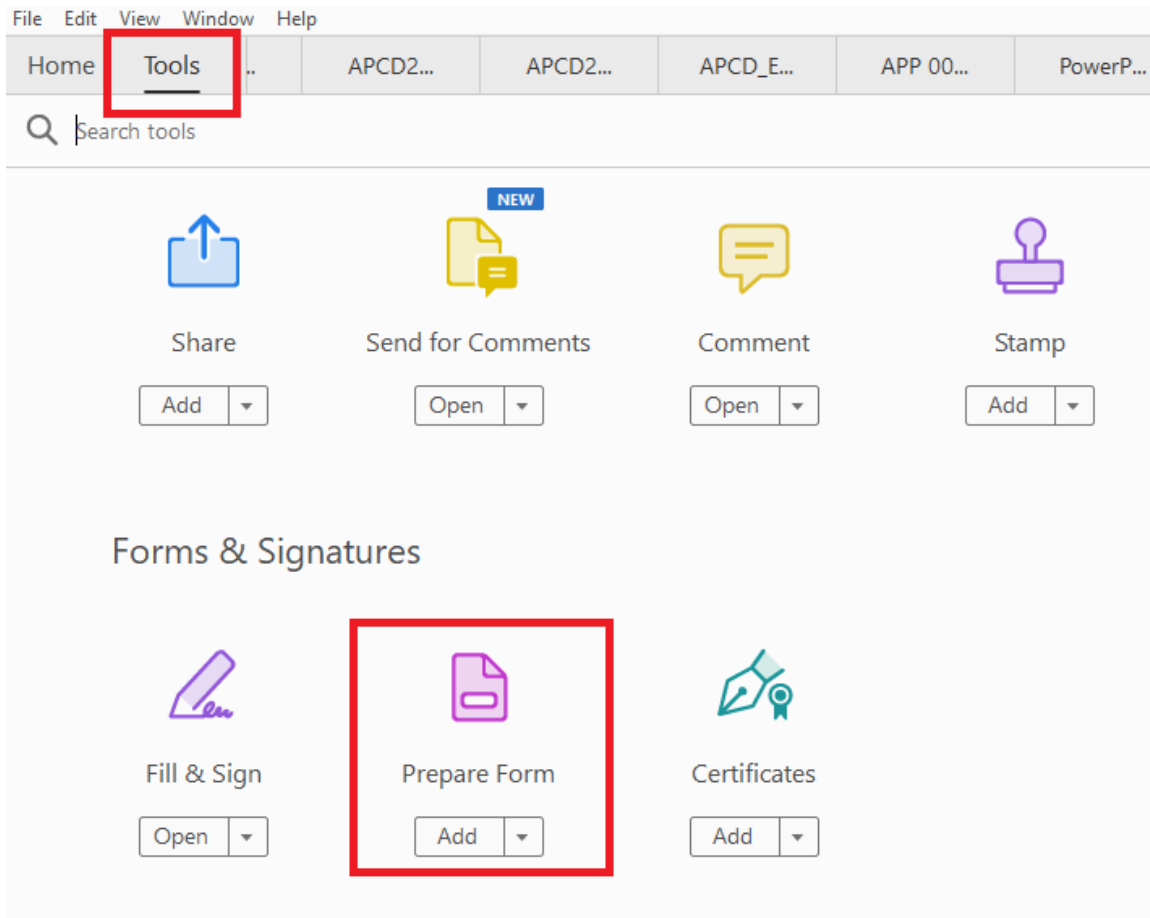
_Note: [ACA] on a field lat means that the information can be viewed by customers in Accela Citizen Access (online permit system)

APCD V 19.1.4 Process Form Engineering Supervisor

After running the final version of the A/C report, an electronic signature can be added to the pdf and then sent electronically to the applicant (and uploaded to BCMS/documentum).

To add the electronic signature, use tools → prepare form. Then use signature tool to draw a new signature and close out of tools which allows you to sign and save the document.

Engineering Division Manual of Procedures



3.25 Guidance on performing the Completeness Review (October, 2020)

1. When reviewing an application for completeness, engineers should focus on the following areas. This review must be completed with 30 days of receipt of the application.

- Did they include the basic application forms
- Can we tell some basic facts about the application from the proposal? (Can we rule out an emission increase/TAC emission increase? Will the application trigger

Engineering Division Manual of Procedures

BACT? Will a public notice be required? Is there information we don't need because the proposal involves minimal review?)

- Based on these facts, do we have all the following information based on what level of review is necessary:
 - Information necessary to conduct HRA
 - Sufficient description of the process including manufacturer data, specifications
 - Information to calculate emissions
 - BACT determination including necessary cost data
 - Material information (SDSs)
 - Technical information regarding emission controls
 - Other information necessary to show compliance with potentially applicable rules

2. If the application is incomplete, a list of the missing information and/or questions should be compiled into a letter or email to be sent to the applicant informing them that the application is incomplete and that additional information is required. Applicants should be requested to provide the information within 30 days and informed that the application may be cancelled if incomplete for more than 180 days. Upload a copy of the letter to BCMS. The BCMS Workflow task must be filled in as pending as shown here:

Engineering Division Manual of Procedures

Task Details - Completeness Determination

Action By Division * [Current Division](#)
APCD Engineering Chem & VR

Action By [ACA] * [Current User](#)
Nicholas Horres

Assigned to Division
APCD Engineering

Assigned to

Current Status
Pending

New Status (Alt + S) [ACA] *
Pending

Hours Spent (Alt + H) *
1.3

Status Date *
09/27/2020

Comments [ACA]
[Standard Comment](#)
Review application, prepare and send incomplete notification.

☐ Overtime

[check spelling](#)

Set status to pending, enter time spent and brief description of work performed

Application Completeness Info

If complete information is received, fill these in:

Enter the date deemed incomplete and check the box indicating that the application was contacted. Also check "no" on the Complete Notification

Application Deemed Complete

Used for Tickler Report

Notification *
☐ Yes ☒ No

If information received is incomplete, fill these in

and set Task status to "Pending"

Application Deemed Incomplete

04/05/2020

Incomplete Notification *
☒ Yes ☐ No

Note: [ACA] on a file customers in Accela Citizen Acc

APCD V 19.1.4 Proce Supervisor

3. If the application is complete, engineers should complete the task in BCMS as follows which will automatically notify the applicant that the application is complete. This email should be uploaded to the application.

Engineering Division Manual of Procedures

Task Details - Completeness Determination

Action By Division * [Current Division](#)
APCD Engineering Chem & VR

Action By [ACA] * [Current User](#)
Nicholas Horres

Assigned to Division
APCD Engineering

Current Status
Pending

Assigned to

New Status (Alt + S) [ACA] *
Complete

Hours Spent (Alt + H) *
0.8

Status Date *
09/27/2020

Real Time Ac
based on

whether the s

and the avail

Comments [ACA]

[Standard Comment](#)

Review additional information, upload documents

☐ Overtime

[check spelling](#)

Set status to complete, enter time spent and
brief comment about work involved

_Note: [ACA] on a fie
customers

in Accela Citizen Acc

Enter the date the application
was deemed complete and check
yes on notification

APCD V 19.1.4 Proce
Supervisor

Application Completeness Info

If complete information is received, fill these in:

Application Deemed Complete

09/27/2020

Notification *

☒ Yes ☐ No

If information received is incomplete, fill these in

Application Deemed Incomplete

09/20/2020

Incomplete Notification *

☒ Yes ☐ No

and set Task status to "Pending"

3.26 Documents required to be uploaded during A/C Evaluation (October, 2020)

Engineering Division Manual of Procedures

It is the Engineer's responsibility to upload all documents for engineering evaluations to Documentum unless otherwise discussed and allowed by your supervisor. The following documents should be present for all applications unless not relevant.

Uploaded before or at A/C Issuance (upload documents as they are available/finalized):

- Application and attachments
- Completeness Notification
- Incompleteness notification
- Response from applicant to incompleteness determination
- Any other additional technical data provided by the applicant
- HRA and AQIA reports
- Copies of any NSR, AB3205 or other public notice
- Invoices to the District for public notice and distribution costs (printing, publishing, mailing)
- Emission Calculations
- Engineering Evaluation
- Any public comments provided and District response (if any)
- Any relevant correspondence with the applicant (while some routine applications will not have any documents in this category, any discussion that clarifies the application submittal or otherwise explains context of a permitting decision should be included)
- Any relevant correspondence with other regulatory agencies (e.g. EPA or CARB) that justifies or explains a decision made in the application or in response to a District notice.
- Authority to Construct

3.27 A/C Extension Requests (October, 2020)

Authorities to Construct are issued for a one year period. If construction has not been completed within this timeframe, the applicant may request an extension of an additional year. This can be repeated up to 4 total times for a total of 5 years. If the applicant does not request an extension or the A/C reaches the five year mark, we must cancel the application. A/C extensions can only be issued when more time is needed to complete construction. An A/C extension is not required once the CCN is submitted and authority to operate under the A/C conditions is in effect until we withdraw the authorization or issue an S/A or P/O.

A/C expiration dates are tracked with various tools including the open applications report, the tickler report and BCMS notifications. BCMS will automatically notify the applicant and cc the engineer prior to expiration. If the applicant does not respond to request an extension, the engineer will make a second attempt to contact them within 5 days of the expiration of the A/C indicating that we intend to cancel the application. If they do not respond within 14 days of A/C expiration, we should send a letter to them indicating that we are cancelling the application. All three contact attempts (initial 30 day

Engineering Division Manual of Procedures

reminder, second reminder and cancellation letter) should be uploaded to BCMS. The supervisor should then be notified to cancel the application.

If the applicant does request an extension, we must ask them the following questions.

This can be done over email or verbally. Brief answers will typically be sufficient.

Why has construction not been completed?

Has construction begun?

How far along is construction and what is the expected completion date?

We ask these questions to determine whether or not any additional requirements need to be added to the A/C. In rare cases prohibitory rules and state and federal rules may change and we should revise the A/C to account for any changes prior to extending.

Additionally if construction has not begun, we can re-review the application for compliance with BACT rules and can revise emission limits if a lower limit or new technology has been found to be cost effective. The Engineer should briefly review whether or not any of these situations can come into play and if so, obtain approval from their supervisor prior to extending.

To extend an A/C, two separate BCMS task entries must be completed as shown in the screenshots below. If the extension was requested by email the request should be uploaded to documentum, otherwise the comments should be used to indicate a verbal request.

First set the CCN task to “Reissue AC” in order to reopen the Issue Authority to Construct task.

Engineering Division Manual of Procedures

Task Details - Construction Completion Notice

Action By Division * [Current Division](#)

APCD Engineering Chem & VR ▼

Action By [ACA] * [Current User](#)

Nicholas Horres ▼

Assign
APCD

Current Status

Assign


New Status (Alt + S) [ACA] *

Reissue AC ▼

Hours Spent (Alt + H) *

0 x

Status Date *

09/27/2020 

Comments [ACA]

 [Standard Comment](#)

☐ Overtime



In the CCN task set the
status to "Reissue AC"

[check spelling](#)

No
cust
in A

APC
Sup

Construction Completion Notice

Now that the A/C task is open, you can extend the deadline by one year and recomplete the task. This will send an automatic email to the applicant listing the extension which should be uploaded to Documentum automatically.

Engineering Division Manual of Procedures

Task Details - Issue Authority to Construct

Action By Division * [Current Division](#)
APCD Engineering Chem & VR

Action By [ACA] * [Current User](#)
Nicholas Horres

Assigned to Division
APCD Engineering

Assigned to

Current Status
Complete

New Status (Alt + S) [ACA] *
Complete

Hours Spent (Alt + H) *
0.3

Status Date *
09/27/2020

Comments [ACA]
[Standard Comment](#)

☐ Overtime

Set status to complete

[check spelling](#)

Revise only the expiration by extending the year of expiration by one

Authority to Construct Information

ATC Issued *
☒ Yes ☐ No

INITIAL Authority to Construct Issue Date
11/28/2018

Authority to Construct Expiration Date
11/28/2020

Real Time Accounting Code will assess, invoice based on whether the specific Task is Billable, your Ti and the available balance in relevant Trust A

Note: [ACA] on a field label means that the information is available in Accela Citizen Access (online permit system)

APCD V 19.1.4 Process Form Engineering Supervisor

TSI: APCD_IATC Version: Feb 2016

3.28 Application deadline (Rule 18) extensions

Extensions should be infrequent but may be necessary due to District and applicant needs. As soon as an engineer determines that there is insufficient time to act on an authority to construct application within the 180 deadline, the supervisor must be informed. If it is determined that a 90-day extension is necessary, we must request a 90-day extension from the permit applicant in writing and they must concur in writing. This response must be uploaded to BCMS prior to the deadline. The request may be informal and typically consist of an email exchange. A request should be made no later than 2 weeks prior to the end of the 180 days for simple projects, or earlier for more complex projects.

Additional 90 day extensions should be avoided. If the application is not expected to be acted upon within the initial 90-day extension, additional extensions must be discussed with the supervisor and the Chief of Engineering.

3.29 Application review regulatory deadlines

District rules contain the following deadlines for application review. Engineers are expected to know these deadlines and utilize available tracking tools (tickler, open apps,

Engineering Division Manual of Procedures

etc.) to ensure projects are completed on time. Supervisors may also help by setting shorter deadlines for simpler projects or incremental deadlines for more complicated projects to ensure smooth work flow and prevent surprises near the end of the timeline.

Deem Application Complete/Incomplete – 30 days after receipt. Applications that are not deemed either complete or incomplete within 30 days are considered by default to be complete which may cause problems meeting the timeline to act on the application.

Act on Application for A/C– 180 days after deemed complete. If the District does not approve or deny an application within 180 days, the application may be considered approved by default may not have the appropriate conditions needed to ensure compliance with District rules. While this does not relieve the operator of the need to comply with rules, it is imperative that we meet this deadline. If this deadline cannot be met, an extension must be requested from the applicant as discussed below.

Applicant Deadline to Respond to Incomplete Determination – 180 days after deemed incomplete. If an applicant fails to respond we are required to cancel the application. If an applicant requests an extension to the deadline, it should be documented in writing in BCMS and discussed with your supervisor to determine if an extension can be issued. Engineers should attempt to contact the applicant at least twice before cancelling the application and upload the correspondence in BCMS. Applications may be cancelled by providing written notice to the applicant. Cancellation notice may be sent electronically for applications where email has been a primary method of communication with the applicant.

Act on Application for P/O – 180 days after receipt of construction completion notice. Engineers should finish the PTO engineering evaluation as soon as possible after being notified that construction is complete but no later than 180 days unless there are circumstances preventing approval of the application such as delayed startup testing. This is important for two primary reasons: it helps ensure that the permit will be issued before the startup authorization expires, and it minimizes the probability that additional renewal fees will be due prior to issuing the permit.

3.30 Documenting Public Comments Received

The District is required to report on public comments received on an annual basis. To facilitate this, Engineers are expected to log any comments received into BCMS as they are received in addition to uploading any written comments received to Documentum. Comments should be logged into the “comments” portlet in BCMS and should contain the following information:

Public Comment Received
Date of Comment:
Type of Notification:
Was response provided?

Engineering Division Manual of Procedures

Comment type:
Comment:
Response (if provided)

As an example, a comment should be entered similarly to this:

APCD2018-APP-005560

A notice was added to this record on 2019-03-14.
Condition: Severity: Notice:
Total conditions: 1 (Notice: 1)
[View notice](#)

Submit Reset Cancel Help

Go To Gas Turbine Activities (0) Activity Summary (15) Address (0) Addtl Info Calendar Classic Reports **Comments (0)**

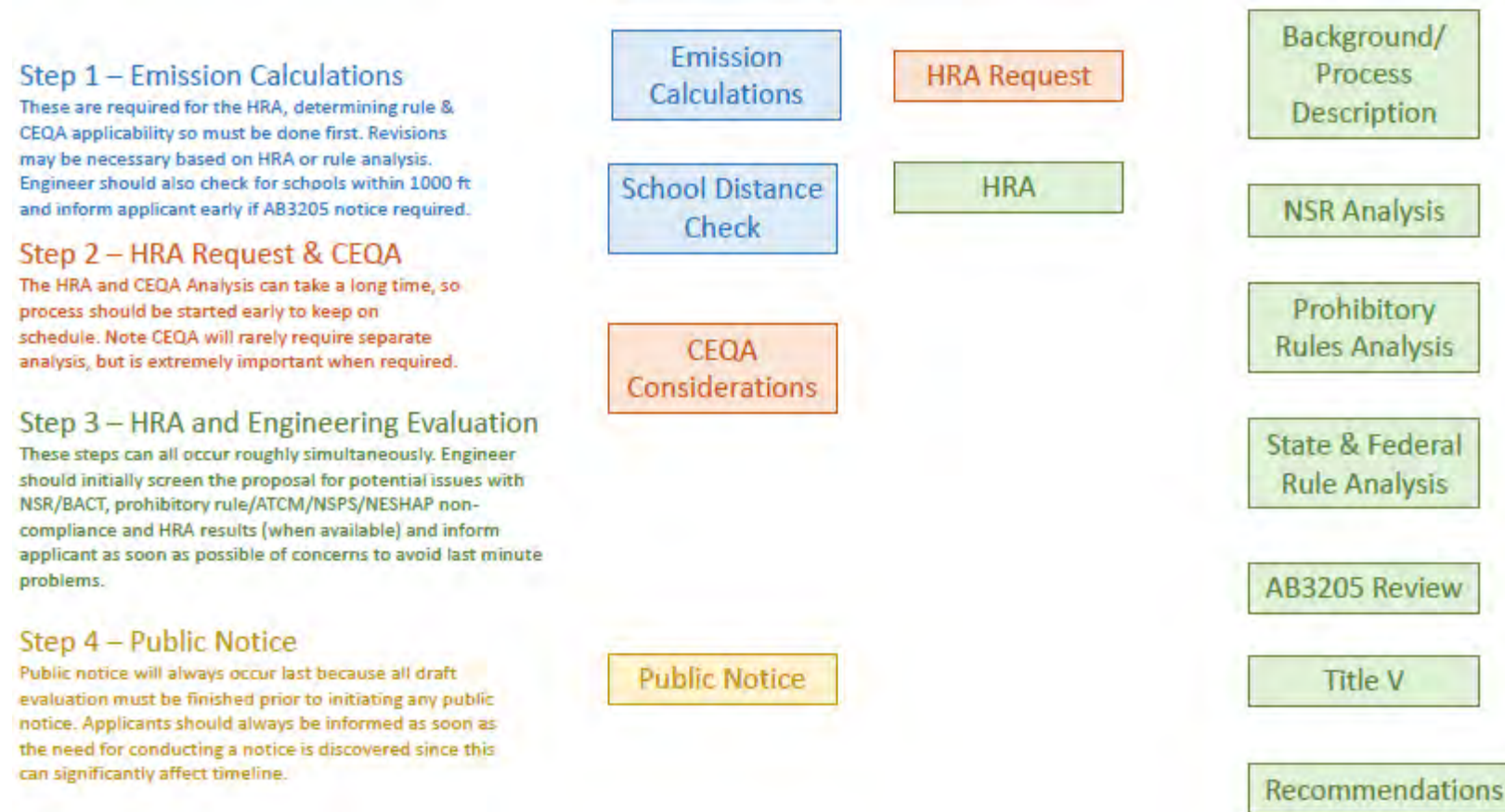
Comment + Standard Comment

Public Comment Received
Date of Comment: 10/13/2020
Type of Notification: AB3205
Was response provided? Yes
Comment type: Email
Comment:
The proposed new project should only be approved if it implements BACT and passes an HRA. Otherwise it should be denied!
Response (if provided)
We responded that we had completed our preliminary evaluation and the project was implementing BACT and had passed an HRA.

Add a new comment and enter it here using the template provided

3.31 Suggested A/C Permit Evaluation Process

To ensure that we meet the regulatory requirements for reviewing applications in a timely fashion, engineers should carefully plan their work on applications so tasks that form the basis of later work are completed first, and any work that can proceed simultaneously is identified to minimize the net time to review applications. The following figure provides an example of a typical A/C evaluation and which steps can occur first or must occur later:



4. New Source Review

4.1 Interpretation of Rule 20.2(d) (August 11, 1986)

Rule 20.2(d) requires BACT or LAER only for those specific pollutants that exceed the "major source" thresholds. The rule was not intended to mean that cases where one pollutant was major, all would be required to install BACT or LAER regardless of emission levels. Accordingly, for new sources, BACT (attainment pollutants) or LAER (non-attainment pollutants) will be required only for those pollutants that are "major," unless BACT is required at lower emission rates by application of Rule 20.2.

4.2 Emissions Counting for NSR Rules (April 9, 1980)

- A. Non-vehicular emissions that are emitted directly from the stationary source (as defined by Rule 20.1(a)(7)) will be summed to determine if threshold levels are exceeded. Direct emissions include, but are not limited to, those associated with the new project from point source (stacks and chimneys), fugitive dust from vehicular traffic, fugitive process emissions, emissions from the stacks and engines of ships when they are in the "hotel" mode while loading or unloading cargo, on-site emissions from railroad train engines associated with the source, etc.
- B. Emissions that should not be included with those from the source are:
 - 1) Increased power plant emissions that result from the production of additional power to accommodate the source unless such power is generated on-site.
 - 2) Fugitive dust emissions that do not occur at the source.
 - 3) Emissions from ships that are in transit to or from the point of cargo transfer.

4.3 Cumulative NSR Emissions Summary Sheets (December 3, 2002)

A standard Cumulative NSR Emissions Summary Sheet should be used by engineers processing permits at existing major sources for calculating and documenting cumulative permitted emission increases to meet federal NSR and PSD requirements in Rules 20.3 and 20.4. The standard form is available on the S-drive.

A Cumulative NSR Emissions Summary Sheet is to be prepared for each permitting action at every existing and proposed new stationary source that emits, or will emit, 25 tons per year or more of VOC or NO_x, or 50 tons per year or more of PM₁₀, SO_x or CO. A completed Summary Sheet is to be included as part of the permitting documentation for permit actions at these stationary sources. Although major sources under NSR are defined by emissions above 50 tons per year (NO_x and VOC) or 100 tons per year (PM₁₀, CO and SO_x), those thresholds are based on potential to emit. The 25/50 ton thresholds

Engineering Division Manual of Procedures

specified in this procedure will be used as a surrogate since in many cases inclusion will be based on a stationary source's actual rather than potential emissions.

A stationary source is affected by this procedure if:

1. It is an existing source with *actual* emissions equal to or greater than any of the following:
 - 25 tons per year of VOC
 - 25 tons per year of NO_x
 - 50 tons per year of CO
 - 50 tons per year of PM₁₀
 - 50 tons per year of SO_x,
- or
2. It is an existing source with actual emissions below the levels specified in #1 but will have emissions at or above any of those levels if the current application is approved, or
3. It is a new stationary source that will be permitted to emit at or above any of the levels specified in #1.

A listing of existing stationary sources with emissions at or above the 25 and 50 tons per year thresholds is available on the S-drive, *APCD /engineering/ NSR emission summaries/NSR and PSD 25 and 50 tpy list Sept 2002* share folder or from the Emissions Inventory section.

If an engineer is processing an application for a new, modified, replacement or relocated emission unit(s) at an affected stationary source, a Cumulative NSR Emissions Summary Sheet must be completed as part of the Authority to Construct (or modified Permit to Operate) evaluation. All criteria pollutant (VOC, NO_x, PM₁₀, SO_x and CO) emissions changes associated with new or modified permits should be placed on a single NSR/PSD summary sheet for each affected stationary source.

[Note: Summary sheets are not required for stationary sources that emit less than 25 tons per year of VOC and NO_x and less than 50 tons per year of PM₁₀, SO_x and CO. However, some have been created in the past for smaller sources and are available in the NSR Site Summaries folders.]

If the application is for an existing stationary source above a 25 or 50 tons per year threshold, you will need to determine if an up-to-date complete Summary Sheet already exists for the stationary source. The S-Drive share folders can be checked for an existing Summary Sheet for the specific stationary source you are working on.

Engineering Division Manual of Procedures

If you open the folder and the icons appear as anything other than Excel icons, change the “properties” of the files as follows: Right-click on any icon; Left-click on “Properties”; under the “General” tab, Left-click on “Change”; Left-click once to highlight the “Microsoft Excel for Windows” option; Left click “OK”. All of the icons should then convert to Excel icons and should be accessible to you for use.

If a Summary Sheet already exists, update it by adding the information for the Authority(ies) to Construct or permit(s) you are approving (and any missing permit actions). Check the permit database and associated permit files for the last several permit actions taken at the source and any other open applications that may be assigned to other engineers. If only old worksheet(s) exist, transfer relevant emissions data to a new Summary Sheet. If you are working on the first application for a new stationary source or no sheet exists on the S-Drive, a new Summary Sheet for the stationary source using the standard form needs to be created. If a Summary Sheet does not exist, or an existing sheet is not up-to-date, the permitting engineer (or applicant – see above) will need to prepare a current sheet that accounts for all permitting actions taken over the current and preceding four calendar years (contemporaneous period under Rule 20.1).

The NSR Emissions Summary Sheet should also be updated if the allowable emissions in the permit(s) are known to have changed from those currently shown on the Summary Sheet for that stationary source.

Note that the form includes the BACT, AQIA, PSD, major source and offset trigger levels at the bottom of the sheet.

Following completion (and Senior review and approval) of the new/updated Summary Sheet, include a copy in the permit file as an attachment to your Engineering Evaluation Cover Sheet. File the completed electronic version of the Summary Sheet in the appropriate *NSR Site Summaries* folder. Filing is to be done alphabetically by stationary source name.

Pursuant to Rule 20.3(d)(8), if an application is for a new major source or a modification at an existing major source, the District project engineer can require the applicant to prepare the contemporaneous emissions increase accounting. Either as part of pre-application consultations or a request for additional information, the applicant should be given the option of preparing the contemporaneous emissions increase accounting OR having the District prepare the accounting as part of the NSR evaluation (at the applicant’s expense). If the applicant elects to prepare the accounting, the District must provide access to or copies of previous/current permit application evaluation information, if requested by the applicant. This can include the information described below. Any accounting prepared by an applicant must be reviewed by the project engineer for completeness, accuracy and that it has been prepared in accordance with the provisions of the NSR rules. If changes are required, the applicant should be given at least one opportunity to make corrections before the District determines either that the application is incomplete and cannot be approved, or that the District will prepare the required contemporaneous accounting.

Engineering Division Manual of Procedures

4.4 RACT/BACT/LAER Clearinghouse Submittals (Tom Weeks, December 3, 2002, Revised 2/2012)

New BACT/LAER determinations must be submitted to ARB in a timely manner. These submittals should not only include controls proposed for major stationary sources but also any BACT determination for non major stationary sources.

BACT/LAER determinations must be submitted to ARB upon senior approval by completing the form available at <http://arbis.arb.ca.gov/bact/bact.htm> (password bact005). ARB has requested up to five determinations per District. Therefore, if you make a determination that is already posted on the Clearinghouse website, you should still complete the form unless there are already five of the same determinations from San Diego.

Submittal of determinations was identified as an area for improvement in a past ARB audit. Permit processing engineers use the Clearinghouse for information on the BACT and LAER determinations made by other districts. Therefore, it is important that we contribute our determinations to this shared resource.

Determination is based on the District's BACT Guidance Document look-up tables need not be submitted.

4.5 Repeal of State Offset Requirements (December 23, 1998)

As of December 17, 1998, Engineers no longer need to implement State offset requirements on pending applications for Authorities to Construct or modified Permits to Operate. The requirements to offset all VOC and NO_x emission increases subject to NSR at facilities with the potential to emit more than 15 tons per year of either VOC or NO_x is no longer in effect. BACT and AQIA requirements still apply. Also federal LAER/BACT offset and PSD requirements still apply.

4.6 Interpretation of Rule 20.3(d)(4)(i) Procedure Regarding Timing of Final Actions on Applications Requiring Public Notice and a 30-Day Comment Period (November 24, 1999)

A question has arisen concerning interpretation of Subsection (d)(4)(i) of Rule 20.3. This subsection provides for a public notice of a proposed action on an application that will result in emission increases sufficient to require an air quality impact analysis, notice of such proposed action to ARB and EPA, availability of specified information for review, and a thirty day period within which comments can be provided. This subsection also requires that these actions be initiated 40 days prior to final action on the application, and that the District consider all comments submitted. Subsection (d)(4)(ii) also provides for a period of ten days after the close of the public comment period for the applicant to respond to comments received.

Engineering Division Manual of Procedures

The question has been raised whether the District can take final action after the 30-day comment period has closed but less than 40 days after the notice of proposed action is given if no comments have been submitted or if the comments submitted can be considered sooner than the 40 days. The intent of the 40 days was to allow the District time to consider comments submitted and for the applicant to respond to comments if the applicant so chooses. The intent was not to extend the opportunity for comment beyond 30 days or to unnecessarily delay taking final action.

Final action on such an application may be taken after the close of the 30 day comment period and before 40 days after notice of the proposed action is given if:

- No comments have been submitted.
- For time critical projects, if all comments submitted have been reviewed and considered before taking final action and the applicant has elected not to respond to the comments or has responded and the applicant's comments have been considered before taking final action. All comments shall be discussed with the Chief of Engineering prior to taking final action.

4.7 Air Quality Impact Modeling Referrals (September 24, 1993)

It has been brought to attention that some Engineering staff have been providing guidance to applicants and their consultants with regard to modeling and procedures for conducting air quality impact studies, both for criteria pollutant modeling and toxic air contaminant impacts, that will be prepared by the applicant or a consultant. This has resulted in incorrect or misunderstood guidance that must be subsequently corrected at the time of modeling protocol submittal. District guidance should come from the group responsible for reviewing and approving such modeling, i.e. the Meteorology and Modeling Section of Monitoring & Technical Services.

To ensure that appropriate guidance is provided, all discussions with applicants or consultants regarding either criteria pollutant or toxic air con t modeling that they will be preparing, beyond just a general description of the APCD process (i.e. if modeling is required, submit protocol for approval, model following approved protocol), are to be referred to the appropriate M&TS Modeling Section staff. If you will be in a meeting with an applicant or consultant at which modeling to be prepared by them may be discussed, you should alert the M&TS Modeling staff and ask them to attend, or join the meeting when modeling is discussed. If you are in a meeting when such modeling is brought up, you should see if a M&TS Modeling staff person is available or, if not, advise the applicant or consultant to contact the appropriate Modeling staff person. You should then advise that staff person to expect the contact and what issues may arise.

4.8 EPA Allowable Preconstruction Activity Guidelines (November 4, 1993)

Engineering Division Manual of Procedures

This section reiterates EPA's longstanding interpretation concerning the range of construction related activities that lawfully may occur prior to the issuance of a permit to construct or modify a facility or emissions unit.

The Clean Air Act mandates a pre-construction review program for sources subject to Prevention of Significant Deterioration (PSD) (§ 165) and New Source Review (NSR) (§§ 172 and 173) requirements. In addition, under § 110 (a)(2)(c), State and local agencies are required to include in their State Implementation Plans pre-construction review programs necessary to assure that construction of any new or modified source is consistent with attainment of the National Ambient Air Quality Standards. To fulfill this requirement, most District rules require that any person building any article, machine, or contrivance which may cause the issuance of air contaminants shall obtain authorization for such construction prior to beginning actual construction. Pre-construction review is a necessary precursor to engineering and public review processes. As a result of this process, the permitting authority may require installation of air pollution control or monitoring equipment that was not initially provided for in the design process. Thus, the pre-construction review process is mandated both to ensure that Clean Air Act requirements are met and to help sources avoid costly construction changes.

The question of what type of preliminary site activities may be conducted prior to permit issuance was addressed by EPA policy memoranda on December 18, 1978, March 28, 1986 and May 13, 1993. These memoranda explain that certain limited activities that do not represent an irrevocable commitment to the project would be allowed, such as planning, ordering of equipment and materials, site clearing, grading, and on-site temporary storage of equipment and materials. Any of these activities, if undertaken prior to issuance of a permit, would be at the risk of the owner or operator.

In contrast, all on-site activities of a permanent nature aimed at completing construction or modification of the source--including, but not limited to, installation of building supports and foundations, paving, laying of underground pipe work, construction of any permanent storage structure, and activities of a similar nature--are prohibited until after the permit is issued and effective, under all circumstances.

4.9 EPA Notifications Required (June 8, 1992)

We are required by District rules, EPA policies and our grant from EPA to notify EPA Region 9 of certain proposed permit actions, and to provide specified background materials. Notice of the following should be provided to EPA Region 9:

- Receipt of an application for permit for any new major source that will cause an increase in emissions greater than 100 tons per year of NO_x, SO_x or total particulates. Notice to be provided within ten days of the receipt of the application.
- Receipt of an application for permit for any major modification of an existing major source that will cause an increase in emissions greater than 40 tons per year of NO_x

Engineering Division Manual of Procedures

or SO_x or 25 tons per year of total particulates or 15 tons per year of PM₁₀. Notice to be provided within ten days of the receipt of the application.

- Proposed Authorities to Construct for any new or modified source that will result in an emissions increase equal to or greater than:

ROG	250 lbs./day or 40 tons per year
NO _x	250 lbs. /day or 40 tons per year
SO _x	250 lbs./ day or 40 tons per year
CO	550 lbs./ day or 100 tons per year
PM ₁₀	80 lbs./day or 15 tons per year

Except for PM₁₀, these notice triggers are identical to that of Rule 20.3. For PM₁₀, the Rule 20.3 trigger of 25 tons of total particulates per year can be used as an indicator of whether PM₁₀ may exceed 15 tons per year. However, the latter is the EPA requirement.

Notice to EPA should be provided 10 days prior to the beginning of the public comment period of Rule 20.3 and should include copies of the public notice, the draft A/C and the Engineering Evaluation Coversheet.

- Proposed draft Authorities to Construct or modified permits for sources that propose to use onsite emission reductions to net out of NSR or PSD review.
- Proposed banking credit certificates. Notice should be provided with submittal of the public notice for publication and should include copies of the draft emission reduction credit certificate, the public notice and the Engineering Evaluation Coversheet.
- A copy of the final Authorities to Construct for projects listed above, including responses to any EPA comments received.

All notifications should be sent to:

New Source Section (A-3-1)
EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105

4.10 Notice of EPA of Banking Actions

EPA must be notified of all banking actions. All notifications to EPA for permitting and banking actions must include a copy of the public notice and a copy of the proposed Authority to Construct, modified Permit to Operate (if no A/C) or banking certificate, as applicable.

Engineering Division Manual of Procedures

4.11 Implementation of 1998 NSR Revisions (December 1998)

With ARB approval of the repeal of the state offset program in San Diego's NSR rules, the requirement to offset all VOC and NO_x emission increases from permitting actions subject to NSR at facilities with the potential to emit more than 15 tons per year of either VOC or NO_x is no longer in effect. BACT and AQIA requirements still apply. Also, federal LAER/BACT, offset and PSD requirements still apply. However, these are triggered at the generally much higher major source, major modification or PSD thresholds specified in the NSR rules.

Engineers should no longer be implementing state offset requirements -on pending applications for Authorities to Construct or modified Permits to Operate. Engineers must continue to calculate and document the emission increases for their applications. Under the ARB approval we will need to periodically assess the overall regional emission effects of repealing the state offset requirements. The Evaluation Coversheet includes a table (and related database) for compiling emission increases (both permitted and expected). This information will be used not only for the tracking required by ARB but also as a means of identifying sources that should be inventoried under the criteria emissions inventory and Toxic Hot Spots programs and as an aid in estimating emission fees.

A. Applying Federal NSR/PSD Requirements

For the vast majority of permitting actions, BACT (and occasionally AQIA requirements) will be the only NSR requirements. Federal NSR/PSD requirements apply only when the project under review:

- By itself constitutes a new major source of VOC or NO_x. This occurs when the new project's post-project potential to emit is equal to or greater than 50 tons per year of either VOC or NO_x (not combined).
- By itself constitutes a new PSD major source. See Rule 20.1 for the emission thresholds for this type source.
- Is located at an existing major stationary source of VOC or NO_x and, in conjunction with other contemporaneous emission increases and decreases from permitting actions occurring at the stationary source, constitutes a major modification (an emissions increase equal to or greater than 25 tons per year of VOC at an existing major VOC stationary source or 25 tons per year of NO_x at an existing major NO_x stationary source).
- Is located at an existing major PSD stationary source and, in conjunction with other contemporaneous emission increases and decreases from permitting actions occurring at the stationary source, constitutes a PSD modification (see Rule 20.1 for the emission increase thresholds for a PSD modification).

Engineering Division Manual of Procedures

Few projects will by themselves constitute a new major source or PSD source or even a PSD modification. However, applications for new or modified emission units or permits at existing major VOC or NO_x sources must be evaluated to see if those applications constitute a major modification for VOC or NO_x. This requires determining not only the emissions increases from the project being evaluated, but also all contemporaneous emission increases and decreases of VOC and NO_x that have been permitted at the major stationary source during the five year contemporaneous period. *(Note: because of changes in federal law, the contemporaneous accounting period has changed from the period back five years from receipt of a complete application to the period consisting of the calendar year in which the project will commence operation and the four preceding calendar years.)*

Whether an existing stationary source is major for VOC and NO_x is based on the source's aggregate potential to emit (PTE). However, doing a PTE inventory on every stationary source for which we receive an application to determine if it is major based on PTE would be time consuming and inefficient. In order to minimize the number of cases where a contemporaneous accounting is needed, permitting engineers are to evaluate whether an existing stationary source is major for VOC and NO_x only in the following cases:

- When the application for a new or modified emission unit results in an annual emissions increase of VOC or NO_x,

and
- The actual emissions at the existing stationary source equal or exceed 25 tons per year of VOC or NO_x, whichever is the pollutant for which the application results in an emission increase. The 25 tpy actual emissions will be used as a surrogate for a PTE of 50 tpy or more.
- A list of existing sources whose actual emissions inventory is equal to or greater than 25 tons per year of VOC or NO_x is available from Emissions Inventory. Engineers should use this list to identify existing potential major sources for initiating a more detailed NSR review. The list will be regularly updated by Emissions Inventory and will be posted in Engineering's VAX share file.
- If actual emissions for the existing stationary source equal or exceed 50 tons per year of VOC or NO_x, then clearly the source is major for that pollutant and a further evaluation of aggregate PTE is unnecessary.
- If actual emissions are equal to or greater than 25 but less than 50 tons per year of VOC or NO_x, then the aggregate PTE must be evaluated to determine if the stationary source is major for either VOC or NO_x. The aggregate PTE

Engineering Division Manual of Procedures

should include all existing permitted emission units and any units/projects for which an Authority to Construct has been issued.

The applicant is to be advised by the project engineer that an evaluation of aggregate PTE will be needed to determine if the stationary source is major, and if major, that a contemporaneous emissions increase accounting will be required. The applicant must be given the option of preparing these evaluations for review by the District or having the District prepare them. An applicant may elect to propose limiting conditions on the total stationary source emissions to ensure that the source PTE is less than major source levels. In this case, a new application should be submitted by the applicant detailing how emissions would be limited and proposing monitoring and records necessary to assure compliance with the aggregate emissions limit(s). Rule 60.2 should be consulted since the procedures will be analogous to that for creating synthetic minor source permits.

Once it is determined that the existing stationary source is major for VOC or NO_x, if the project will result in an annual emissions increase of whichever pollutant is major, an accounting of contemporaneous emission increases and decreases must be done to determine if the project is a major modification and subject to federal LAER/BACT/offset requirements. This accounting must include any other units or projects for which an application is pending review.

B. Permit Limits on Emissions

Another aspect of the NSR changes is that with the repeal of the state offset requirements, the 15 ton per year offset threshold that frequently was used in permits to limit emissions no longer applies. This can affect existing Authorities to Construct and Permits to Operate as well as applications under current review. We should expect that applicants and permit holders with 15 ton per year limits already in their permits will request that the limit be removed. While this may be permissible, it should not be done administratively on a wholesale basis. Releasing the applicant/permittee from this threshold could have implications relative to toxic air contaminant emissions, previous BACT cost effectiveness decisions or compliance with a prohibitory rule.

Therefore, a request to remove a 15 ton per year limitation in a permit or A/C must be done in the form of an application to modify the permit or amend the A/C, respectively. The project engineer must charge the applicant for the costs of evaluating the change, and the change must be evaluated under the provisions of the current Rules and Regulations, including the revised (12/98) NSR rules.

For current open applications and future applications subject to NSR review, emissions may be limited in permits by the most stringent of:

- the operating levels (e.g. hours of operation, fuel/materials usage, production levels) requested in an application by a permit applicant,

Engineering Division Manual of Procedures

- a Rule 1200 review,
- BACT or BACT cost-effectiveness threshold (or limits on the applicability of BACT look-up tables in the BACT Guidance Document),
- AQIA thresholds or an AQIA result,
- public notification thresholds,
- compliance with a District rule or regulation, state ATCM or federal NSPS or NESHAPs (or emissions/operational limits to avoid applicability of one or more such standards),
- the federal NSR or PSD thresholds for major sources /major modifications, or
- the physical capacity of the unit to emit considering any emission controls that are proposed/required for the unit.

In the absence of the 15 ton per year state offset threshold for VOC and NO_x, the allowable emissions for some projects could be relatively high (e.g. up to new major source levels absent any other limiting rules). The District needs to ensure that the apparent emission increases in permits are realistic, consistent with the District's authority in Rule 21 to impose permit conditions necessary to ensure compliance.

Accordingly, the procedure henceforth will be to include in permits as limiting conditions the levels of operation requested by the applicant in the permit application. Those levels may not exceed the physical capacity of the emission unit, and the operations must be in compliance with all applicable District rules and regulations, and with any state or federal rules the District is enforcing. The levels should be those reflected in the final application information on which a permitting decision is being made.

For example, an applicant may specify maximum coatings use in a paint spray booth, at a non-major source, of 2 gallons per hour, 10 gallons per day and 1000 gallons per year. After completion of the engineering evaluation, the project engineer determines that the applicant has proposed BACT and the operations will comply with all District rules. Even though the NSR and Rule 1200 analyses might find that the emission unit would still comply with much higher coatings usage, the permit must be written with conditions limiting usage to the levels requested in the application. (*Note: If there are no acute health effects issues, there may be no need to include an hourly usage limit in the permit.*) The permit must also include conditions requiring the site to keep records necessary to assure on-going compliance with the operational limits. These conditions should be discussed with the applicant before proceeding with the A/C, S/A or P/O, as applicable.

Engineering Division Manual of Procedures

When the operational levels requested by the applicant are the determining limitation on emissions, they are to be reflected in the permit as operational limits, not as underlying emission limits. The permit may also contain emission limits that coincide with emission limits in applicable rules. If the conditions that will be imposed in an Authority to Construct or in a new or modified permit will allow emissions from the emission unit under review to equal or exceed 15 tons per year of either VOC or NO_x, the project engineer must consult with their Senior Engineer and advise the Chief of Engineering before proceeding with the authorization.

C. Deferred/Pending/Provided Offsets

Existing permit (or Authority to Construct) conditions that allowed previous projects to defer small amounts of state offsets (VOC, NO_x, PM₁₀) can be rescinded. This will be done administratively for existing permits to operate and will not require a source to submit a new application. In the case where such a condition appears in an A/C, the project engineer should not carry forward the condition to the permit. However, this does not allow administrative removal of any existing operational or emission limits in the permit or A/C. Any emission or operational limits in the permit or A/C must remain in effect and can only be changed by an application to modify the permit or amend the A/C and after a reevaluation of the new request under current NSR and other applicable rules.

Where an A/C requires that an applicant provide state offsets before commencing operations, but the ERC's have not yet been surrendered to the District, the requirement to provide offsets is to be rescinded by the project engineer by issuing a revised AIC (with the applicant's concurrence). An application to amend the A/C would not be required for this change.

Where an application is pending and the Applicant was told that offsets were required, the project engineer is to advise the applicant that offsets are no longer required. This must be documented in the application file.

Where an applicant/permittee has already provided state offsets for a project the ERC's have been surrendered to the District, and the operations being offset have commenced, those ERC's are no longer valid and cannot be returned to the applicant/permittee.

All labor spent on an application associated with the above procedures must be charged to the application.

The above procedures do not apply to offsets required to meet federal NSR, to mitigate a local air quality impact, or required as a result of a CEQA analysis.

Engineering Division Manual of Procedures

5. Toxic New Source Review

5.1 Rule 1200 Toxic Screening Procedure and Screening Emission Rates (April 12, 1998, modified April, 2009, modified September 2, 2010, modified May 2012, modified February 2016)

OVERVIEW

This procedure provides District engineering staff and permit applicants with a screening tool that can be used to evaluate projects which undergo toxic new source review in accordance with District Rule 1200. If a project meets the applicability criteria and has emissions less than the screening emission rates in Tables 3 and 4, the project is in compliance with Rule 1200 and will not require further evaluation. Projects that do not meet the screening criteria or which have emissions greater than the screening emission rates on Tables 3 and 4 will require further evaluation using refined health risk assessment (HRA) procedures.

The procedure is intended to be health protective. Therefore, caution should be exercised when using the results of this procedure to set usage or emissions limits for equipment being evaluated. Additionally, as with any application, equipment should not be purchased or installed until after the District has issued an Authority to Construct.

Screening emission rates on Table 3 and 4 may be adjusted for projects with receptors greater than 25 meters away or for sources with exhaust stacks 15 feet tall or greater.

This procedure will be revised periodically to reflect updates to health (dose-response) data, addition or deletion of listed toxic air contaminants, and changes in risk assessment methodology. The District Toxics Section is responsible for updating this procedure and screening emission rate values as needed.

APPLICABILITY

The screening emission values specified in Table 3 can be used to evaluate point sources that meet all of the following minimum criteria:

1. Sources with vertical exhaust stacks without raincaps or other obstructions to vertical flow.
2. Sources with exhaust stacks 5 feet above ground level or greater.
3. Sources with exhaust stack exit velocities of 2 feet per second or greater.
4. Sources with a distance from the stack to nearest facility boundary (fence line) of 10 meters or greater.
5. Sources with stacks exceeding the height of all buildings within a distance of 5 times the height of the stack.

The screening emission values specified in Table 4 can be used to evaluate non-elevated volume sources where the distance from the volume source to the nearest facility

Engineering Division Manual of Procedures

boundary (fence line) is 10 meters or greater. Non-elevated volume sources are typically fugitive sources that are not captured and vented through an exhaust system. They can be either inside or outside of a building. If you are unsure if a source can be evaluated as a non-elevated volume source under this procedure, consult the District Toxics Section.

The procedure can be used to evaluate sources with multiple emission points. To do this the total of the ratios of the potential emissions to the screening emissions values for each source are assumed to be additive, and are summed to determine the aggregate impacts.

Per Rule 1200, a higher cancer risk is allowed for sources equipped with Toxics Best Available Control Technology (TBACT). However, if the calculated emission rates are greater than the screening level emission rates (for only one toxic air contaminant emitted) or if the sum of the ratios of potential emissions to screening level emissions are greater than 1.0 (for more than one toxic air contaminant emitted), further evaluation using a refined HRA is required. The permit engineer shall provide all the pertinent information to conduct an HRA to the District Toxics Section. The District Toxics Section shall provide an HRA report to the permit engineer which presents the risks to determine compliance with Rule 1200. Permit applicants may consult with the appropriate District engineering section for assistance in determining if the proposed level of control is considered to be TBACT.

These procedures are not applicable to projects with emissions of dense gasses or emissions which are not continuous. A dense gas is an emission of high concentrations of a TAC that is significantly heavier than air and/or is significantly below ambient temperature. Emissions that occur for periods of less than one hour are not considered to be continuous.

PROCEDURE FOR TOXIC SCREENING

Identify Toxic Air Contaminants

Emissions of any amount of a toxic air contaminant listed on Table 3 and Table 4 must be evaluated. Many toxic air contaminants have a number of synonyms. For example, methyl chloroform, TCA and 1,1,1-trichloroethane are the same substance. One way to ensure you have evaluated all subject compounds is to cross reference the Chemical Abstract Service (CAS) registry number (available on most MSDS sheets) against Table 3 and 4. EPA's cross-reference booklet, Common Synonyms (EPA 745-R-95-008), is useful for this. The National Institute of Standards and Technology (NIST) has a useful website at <http://webbook.nist.gov/chemistry/> may also be used to cross reference the CAS registry numbers and common synonyms.

In addition, several classes of compounds are identified by group, such as chlorofluorocarbons, zinc compounds, chlorinated dibenzodioxins and furans, and others. Consult with the District Toxics Section for questions regarding identification of specific toxic air contaminants with listed groups of compounds.

Engineering Division Manual of Procedures

Determine Averaging Times for Assessment

Source emission rates must be calculated to correspond to the averaging periods of the screening emission rates listed in Tables 3 and 4. Based on the potential health effects related to each toxic air contaminant, either or both the annual and/or maximum hourly emission rates must be calculated. For example, nickel has both an annual and maximum hourly screening emission rate listed on Tables 3 and 4, therefore, emission rates must be calculated for both averaging times. Lead has only an annual emission rate listed on Tables 3 and 4 and therefore, only the annual emission rate must be calculated.

Calculate Potential Emissions for each Applicable Averaging Time

Emissions can be calculated using emission factors, mass balance, engineering calculations, source test results or toxic compound speciation profiles. The District Toxics Section has compiled emission estimation methods for a number of common processes. These methods are presented on the District's website at <http://www.sdapcd.org/toxics/emissions/emissions.html>. You may consult with the District Toxics Section concerning emission calculations unless a simple mass balance or a previously established emission estimation method is available.

Annual emissions are the total potential emissions (expressed in pounds per year) of the listed toxic air contaminant released under expected maximum operating conditions during a one-year period. Maximum hourly emissions are the maximum potential emissions (expressed in pounds per hour) of the toxic air contaminant occurring in one hour under expected maximum operating conditions. Guidance on determining the emission increases, potential to emit and emission reductions are presented in Rule 1200(e).

Calculate Receptor Proximity Adjustment Factor and/or Stack Height Adjustment Factor (Option 1)

The screening emission rate values presented in Tables 3 and 4 are based on the assumption that the nearest receptor is 10 meters from the emission source. If the nearest receptor is a distance of 25 meters or more, dispersion from the source will be greater which results in higher screening emission rate values. In addition, the screening emission rate values presented in Table 3 are based on a stack height of 5 feet. If the source being evaluated has a stack 15 feet tall or taller, dispersion from the source will be greater which also results in higher screening emission rate values. This toxic screening procedure allows the screening emission rate values to be adjusted for additional dispersion by use of a dispersion adjustment factor (DA).

The source to receptor distance (D) must be known in order to calculate the DA factor. Source to receptor distance is the minimum distance from any source of emissions from the emission unit being evaluated to any receptor. The term receptor, as used in the calculation of the DA factor is defined as a residence, business, school, daycare center, hospital, hotel, government facility, retirement home, or any other location where

Engineering Division Manual of Procedures

extended public access is possible. When calculating a DA factor for use with an acute screening emission rate value, the definition above is expanded to also include any location where short-term (one-hour) public access is likely. This typically entails determination of two DA factors; one for calculation of cancer and chronic DA factor, and one for calculation of the acute DA factor. The two DA factors may be based on separate receptor distances - one for cancer and chronic exposures and one for acute exposure.

The Rule 1200 submittal package must include a map that shows the source location(s), facility boundary, nearest receptor(s) and dimensions of any building(s) within 5 times the height of the stack.

Table 1 is used to calculate dispersion adjustment factor (DA) as a function of receptor distance and stack height.

Table 1
Dispersion Adjustment (DA) Factors

Source Type	Averaging Time	Receptor Distance, D (meters)						
		10 to <25	25 to <50	50 to <75	75 to <100	100 to <150	150 to <200	>200
Point Source (5 to <15 foot stack height)	Annual	1.0	2.0	4.5	7.7	11.7	21.5	33.6
	1-hour	1.0	1.9	3.8	6.4	7.1	9.5	12.1
Point Source (>15 foot stack height)	Annual	1.0	7.2	10.9	15.9	21.4	33.3	46.6
	1-hour	1.0	8.3	14.3	19.0	22.8	30.5	40.1
Volume Source	Annual	1.0	3.4	9.8	18.7	29.7	57.7	92.6
	1-hour	1.0	1.8	2.7	3.9	5.2	8.2	11.6

Ratio of Toxics Screening Dispersion Factors using the AERSCREEN Model (Option 2)

A ratio of the dispersion parameter X/Q ($\mu\text{g}/\text{m}^3$)/(g/s) from AERSCREEN to those listed in Table 2 below may be used to adjust the screening emissions rates in Tables 3 and 4 as follows:

(Toxics Screening X/Q from Table 2) / (AERSCREEN X/Q) * Screening Emission Rates listed in Tables 3 and 4. As with Table 1, Table 2 Toxics Screening Dispersion Factors are a function of receptor distance and stack height.

Table 2
AERSCREEN Dispersion Adjustment (DA) Factors, ($\mu\text{g}/\text{m}^3$)/(g/s)

Source Type	Averaging Time	Receptor Distance, D (meters)						
		10 to <25	25 to <50	50 to <75	75 to <100	100 to <150	150 to <200	>200

Engineering Division Manual of Procedures

		10 to <25	25 to <50	50 to <75	75 to <100	100 to <150	150 to <200	>200
Point Source (5 to <15 foot stack height)	Annual	5933	2276	935	546	362	197	126
	1-hour	70156	37330	18353	11017	9893	7417	5790
Point Source (>15 foot stack height)	Annual	600	656	473	310	220	131	91
	1-hour	16309	8486	4908	3691	3081	2296	1748
Volume Source	Annual	12120	3567	1237	649	408	210	138
	1-hour	121200	61255	40645	28567	21291	13441	9474

Compare Calculated Emission Rates with Screening Emission Rate Values

Annual and maximum hourly screening emission rates for toxic air contaminants are listed in Tables 3 and 4. Using the appropriate table (Table 3 for point sources or Table 4 for non-elevated volume sources), determine the screening annual emission rate and/or the screening maximum hourly emission rate, whichever apply. If appropriate, these emission rates may be adjusted for receptor proximity by multiplying them by the DA factor presented in Tables 1 or 2 above. Note: if the screening emission rates are adjusted, only one of the two adjustment options may be used.

If only one toxic air contaminant is emitted and the calculated emission rates for each applicable averaging time is less than the screening level emission rates, the risks are expected to comply with Rule 1200 and no further review is required. Documentation of the evaluation must be provided to the District Toxics Section.

If more than one toxic air contaminant is emitted, the evaluation is based on the sum of the ratios of potential emissions to screening emission rates for each toxic air contaminant evaluated. This is done separately for each applicable averaging time. If the sum of the ratios of potential emissions to screening emission rates are less than or equal to 1.0, the risks are expected to comply with Rule 1200 and no further review is required. This procedure is demonstrated in the example calculation below. Documentation of the evaluation must be provided to the District Toxics Section.

The same method is used to determine the aggregate effect of multiple emission points or sources that are considered to be part of the same project. To do this the total of the ratios of the potential emissions to the screening emissions values for each source are assumed to be additive, and are summed to determine the aggregate impacts. If the sum of the ratios of potential emissions to screening emission rates are less than or equal to 1.0, the risks are expected to comply with Rule 1200 and no further review is required. Documentation of the evaluation must be provided to the District Toxics Section.

If more than one toxic air contaminant is emitted and the sum of the ratios of potential emissions to screening emission rates are greater than 1.0, further evaluation using refined HRA procedures is necessary. The permit engineer shall provide all the pertinent information to conduct a refined HRA to the District Toxics Section. The District Toxics

Engineering Division Manual of Procedures

Section shall provide a refined HRA report to the permit engineer which presents the potential risks to determine compliance with Rule 1200.

The screening levels in Tables 3 and 4 should not be used to limit emissions for a source whose emissions exceed those levels. This could result in unnecessarily limiting the facility's operation due to the conservative nature of the screening level analysis. Instead, a project that has emissions above the screening emissions should undergo further evaluation using a refined HRA.

Engineering Division Manual of Procedures

Example Calculations 1:

A source is estimated to emit xylene at a rate of 10,000 pounds per year and 9.0 pounds per hour. It is also estimated to emit toluene at a rate of 6,000 pounds per year and 3.0 pounds per hour. The source emits through an exhaust stack that is 20 feet tall at a velocity greater than 2 feet per second. There are no buildings greater than 20 feet in height within 100 feet of the stack. The stack is not fitted with a rain cap and is uncontrolled and therefore not a TBACT source. The distance from the stack to the nearest receptor is 65 meters.

From Table 3, the screening emission rates for xylene are 1.15E+04 pounds per year and 2.49 pounds per hour, and for toluene, 4.93E+03 pounds per year and 4.19 pounds per hour. The dispersion adjustment factors from Table 1 are 10.9 (annual) and 14.3 (one hour). For xylene, DA factor adjusted screening emission rates are 125,350 pounds per year (11,500 x 10.9) and 35.6 pounds per hour (2.49 x 14.3). For toluene, the DA factor adjusted screening emission rates are 53,737 pounds per year (4,930 x 10.9) and 59.9 pounds per hour (4.19 x 14.3). The acceptability test for the **annual** assessment is as follows:

$$\left(\frac{10,000 \text{ lb Xylene/yr}}{125,350 \text{ lb Xylene/yr}} \right) + \left(\frac{6,000 \text{ lb Toluene/yr}}{53,737 \text{ lb Toluene/yr}} \right) = 0.08 + 0.11 = 0.19 \text{ which is less than } 1.0$$

The acceptability test for the **hourly** assessment is as follows:

$$\left(\frac{9.0 \text{ lb Xylene/hr}}{35.6 \text{ lb Xylene/hr}} \right) + \left(\frac{3.0 \text{ lb Toluene/hr}}{59.9 \text{ lb Toluene/hr}} \right) = 0.25 + 0.05 = 0.30 \text{ which is less than } 1.0$$

Both the annual emission rate and the one-hour emission rate pass the test and therefore the project does not need to be evaluated further.

Example Calculations 2:

Using the same information provided for Example Calculations 1, ratio of the dispersion parameter X/Q (ug/m³)/(g/s) from AERSCREEN to those listed in Table 2 to adjust the screening emissions rates in Tables 3 and 4 as follows:

AERSCREEN is run and results in an hourly X/Q of 510 (ug/m³)/(g/s) adjusted to an annual concentration (0.1 * hourly) of 51 (ug/m³)/(g/s).

Table 2 Dispersion Factors are an annual concentration of 473 (ug/m³)/(g/s) and an hourly of 4908 (ug/m³)/(g/s).

(Toxics Screening X/Q) from Table 2) / (AERSCREEN X/Q) * Screening Emission Rates listed in Tables 3 and 4.

Annual Dispersion Factor Ratio:

Engineering Division Manual of Procedures

$$\left(\frac{473 X / Q}{51 X / Q} \right) (11,500 \text{ lb Xylene} / \text{yr}) = 106,657 \text{ lb Xylene} / \text{yr}$$

$$\left(\frac{10,000 \text{ lb Xylene} / \text{yr}}{106,657 \text{ lb Xylene} / \text{yr}} \right) = 0.094 \text{ which is less than } 1.0$$

Hourly Dispersion Factor Ratio:

$$\left(\frac{4908 X / Q}{510 X / Q} \right) (2.49 \text{ lb Xylene} / \text{hr}) = 24 \text{ lb Xylene} / \text{hr}$$

$$\left(\frac{9 \text{ lb Xylene} / \text{hr}}{24 \text{ lb Xylene} / \text{hr}} \right) = 0.38 \text{ which is less than } 1.0$$

Both the annual and hourly emission rates pass and therefore the project does not need to be further evaluated.

Requests for Additional Toxic Evaluation

Sources which do not meet the criteria for this screening procedure and projects with the sum of the ratios of potential emissions to screening emission rates are greater than 1.0 must be evaluated further through a refined HRA. It should not be assumed that a source that fails this screening procedure would not pass a more site-specific review. Additional review can be done by either the facility or the District Toxics Section.

The District Toxics Section typically conducts a screening-level HRA using a screening-level dispersion program (AERSCREEN) and simplified procedures. The screening-level HRA incorporates stack parameters (height, diameter, temperature, and flow rate), distance to offsite receptors, and building dimensions. Sources with better dispersion potential (generally higher stack heights, temperature and flow rate), and greater distance to offsite property are more likely to benefit from this secondary screening.

If this secondary screening is not successful, the District Toxics Section, in conjunction with the Meteorology and Modeling Section, will conduct a refined HRA using detailed source, building, receptor and site information in conjunction with actual meteorological data to evaluate potential risk.

Engineering Division Manual of Procedures

Table 3
Rule 1200 Screening Emission Rates for Point Sources

Chemical Name	Chemical Abstract Number	Annual Emission Rate lb/yr	Hourly Emission Rate lb/hr
ACETALDEHYDE	75-07-0	2.09E+00	5.32E-02
ACETAMIDE	60-35-5	2.99E-01	
ACROLEIN	107-02-8	2.74E+00	2.83E-04
ACRYLAMIDE	79-06-1	4.65E-03	
ACRYLIC ACID	79-10-7		6.79E-01
ACRYLONITRILE	107-13-1	2.09E-02	
ALLYL CHLORIDE	107-05-1	9.96E-01	
2-AMINOANTHRAQUINONE	117-79-3	6.34E-01	
AMMONIA	7664-41-7	3.29E+03	3.62E-01
ANILINE	62-53-3	3.67E+00	
ARSENIC AND COMPOUNDS (INORGANIC)	7440-38-2	6.82E-05	2.26E-05
ARSINE	7784-42-1	5.87E-02	2.26E-05
ASBESTOS	1332-21-4	2.85E-07	
BENZENE	71-43-2	2.09E-01	3.05E-03
BENZIDINE (AND ITS SALTS)	92-87-5	4.18E-05	
BENZIDINE BASED DYES	1020	4.18E-05	
DIRECT BLACK 38	1937-37-7	4.18E-05	
DIRECT BLUE 6	2602-46-2	4.18E-05	
DIRECT BROWN 95 (technical grade)	16071-86-6	4.18E-05	
BENZYL CHLORIDE	100-44-7	1.23E-01	2.72E-02
BERYLLIUM AND COMPOUNDS	7440-41-7	2.49E-03	
BIS(2-CHLOROETHYL)ETHER (Dichloroethyl Ether)	111-44-4	8.36E-03	
BIS(CHLOROMETHYL)ETHER	542-88-1	4.55E-04	
POTASSIUM BROMATE	7758-01-2	4.27E-02	
1,3-BUTADIENE	106-99-0	3.49E-02	7.47E-02
CADMIUM AND COMPOUNDS	7440-43-9	1.39E-03	
CAPROLACTAM	105-60-2	2.74E+01	5.66E-03
CARBON DISULFIDE	75-15-0	1.32E+04	7.01E-01
CARBON TETRACHLORIDE (Tetrachloromethane)	56-23-5	1.39E-01	2.15E-01
CHLORINATED PARAFFINS	108171-26-2	2.35E-01	
CHLORINE	7782-50-5	3.29E+00	2.38E-02
CHLORINE DIOXIDE	10049-04-4	9.87E+00	
4-CHLORO-O-PHENYLENEDIAMINE	95-83-0	1.31E+00	
CHLOROBENZENE	108-90-7	1.64E+04	
CHLOROFORM	67-66-3	1.10E+00	1.70E-02

Engineering Division Manual of Procedures

CHLOROPHENOLS	N/A		
PENTACHLOROPHENOL	87-86-5	1.16E+00	
2,4,6-TRICHLOROPHENOL	88-06-2	2.99E-01	
CHLOROPICRIN	76-06-2	6.58E+00	3.28E-03
p-CHLORO-o-TOLUIDINE	95-69-2	7.74E-02	
CHROMIUM 6+	18540-29-9	1.29E-05	
BARIUM CHROMATE	10294-40-3	6.29E-05	
CALCIUM CHROMATE	13765-19-0	3.88E-05	
LEAD CHROMATE	7758-97-6	8.03E-05	
SODIUM DICHROMATE	10588-01-9	3.25E-05	
STRONTIUM CHROMATE	7789-06-2	5.06E-05	
CHROMIC TRIOXIDE (as chromic acid mist)	1333-82-0	2.48E-05	
COPPER AND COMPOUNDS	7440-50-8		1.13E-02
p-CRESIDINE	120-71-8	1.39E-01	
CRESOLS (mixtures of)	1319-77-3	9.87E+03	
M-CRESOL	108-39-4	9.87E+03	
O-CRESOL	95-48-7	9.87E+03	
P-CRESOL	106-44-5	9.87E+03	
CUPFERRON	135-20-6	9.50E-02	
Cyanide And Compounds (inorganic)	57-12-5	1.48E+02	3.85E-02
HYDROGEN CYANIDE (Hydrocyanic Acid)	74-90-8	1.48E+02	3.85E-02
2,4-DIAMINOANISOLE	615-05-4	9.09E-01	
2,4-DIAMINOTOLUENE	95-80-7	5.23E-03	
1,2-DIBROMO-3-CHLOROPROPANE (DBCP)	96-12-8	2.99E-03	
p-DICHLOROBENZENE	106-46-7	5.23E-01	
3,3-DICHLOROBENZIDINE	91-94-1	1.74E-02	
1,1,-DICHLOROETHANE (Ethylidene Dichloride)	75-34-3	3.67E+00	
DI(2-ETHYLHEXYL)PHTHALATE (DEHP)	117-81-7	1.51E-01	
DIETHANOLAMINE	111-42-2	4.93E+01	
p-DIMETHYLAMINOAZOBENZENE	60-11-7	4.55E-03	
N,N-DIMETHYL FORMAMIDE	68-12-2	1.32E+03	
2,4-DINITROTOLUENE	121-14-2	6.75E-02	
1,4-DIOXANE (1,4-Diethylene dioxide)	123-91-1	7.74E-01	3.39E-01
EPICHLOROHYDRIN (1-Chloro-2,3-epoxypropane)	106-89-8	2.61E-01	1.47E-01
1,2-EPOXYBUTANE	106-88-7	3.29E+02	
ETHYL BENZENE	100-41-4	2.40E+00	
ETHYL CHLORIDE (Chloroethane)	75-00-3	4.93E+05	
ETHYLENE DIBROMIDE (1,2-Dibromoethane)	106-93-4	8.36E-02	
ETHYLENE DICHLORIDE (1,2-Dichloroethane)	107-06-2	2.90E-01	
ETHYLENE GLYCOL	107-21-1	6.58E+03	
ETHYLENE OXIDE (1,2-Epoxyethane)	75-21-8	6.75E-02	
ETHYLENE THIOUREA	96-45-7	4.65E-01	
FLUORIDES AND COMPOUNDS	1101	1.36E+01	2.72E-02

Engineering Division Manual of Procedures

HYDROGEN FLUORIDE (Hydrofluoric Acid)	7664-39-3	1.37E+01	2.72E-02
FORMALDEHYDE	50-00-0	9.96E-01	6.22E-03
GLUTARALDEHYDE	111-30-8	1.32E+00	
GLYCOL ETHERS	N/A		
ETHYLENE GLYCOL BUTYL ETHER – EGBE	111-76-2		1.58E+00
ETHYLENE GLYCOL ETHYL ETHER – EGEE	110-80-5	1.15E+03	4.19E-02
ETHYLENE GLYCOL ETHYL ETHER ACETATE – EGEEA	111-15-9	4.93E+03	1.58E-02
ETHYLENE GLYCOL METHYL ETHER – EGME	109-86-4	9.87E+02	1.05E-02
ETHYLENE GLYCOL METHYL ETHER ACETATE – EGMEA	110-49-6	1.48E+03	
HEXACHLOROBENZENE	118-74-1	1.16E-02	
HEXACHLOROCYCLOHEXANES (mixed or technical grade)	608-73-1	3.10E-04	
alpha-HEXACHLOROCYCLOHEXANE	319-84-6	3.10E-04	
beta- HEXACHLOROCYCLOHEXANE	319-85-7	3.10E-04	
gamma-HEXACHLOROCYCLOHEXANE (Lindane)	58-89-9	1.13E-03	
n-HEXANE	110-54-3	1.15E+05	
HYDRAZINE	302-01-2	1.23E-03	
HYDROCHLORIC ACID (Hydrogen Chloride)	7647-01-0	1.48E+02	2.38E-01
HYDROGEN SULFIDE	7783-06-4	1.64E+02	4.75E-03
ISOPHORONE	78-59-1	3.29E+04	
ISOPROPYL ALCOHOL (Isopropanol)	67-63-0	1.15E+05	3.62E-01
LEAD AND COMPOUNDS (inorganic)	7439-92-1	1.87E-02	
LEAD ACETATE	301-04-2	2.93E-02	
LEAD PHOSPHATE	7446-27-7	2.43E-02	
LEAD SUBACETATE	1335-32-6	2.43E-02	
MALEIC ANHYDRIDE	108-31-6	1.15E+01	
MANGANESE AND COMPOUNDS	7439-96-5	6.66E-01	
MERCURY AND COMPOUNDS (INORGANIC)	7439-97-6	4.90E-02	6.79E-05
MERCURIC CHLORIDE	7487-94-7	4.90E-02	6.79E-05
METHANOL	67-56-1	6.58E+04	3.17E+00
METHYL BROMIDE (Bromomethane)	74-83-9	8.22E+01	4.41E-01
METHYL tertiary-BUTYL ETHER	1634-04-4	1.16E+01	
METHYL CHLOROFORM (1,1,1-Trichloroethane)	71-55-6	1.64E+04	7.69E+00
METHYL ETHYL KETONE (2-Butanone)	78-93-3		1.47E+00
METHYL ISOCYANATE	624-83-9	1.64E+01	
4,4'-METHYLENE BIS (2-CHLOROANILINE) (MOCA)	101-14-4	1.39E-02	
METHYLENE CHLORIDE (Dichloromethane)	75-09-2	5.97E+00	1.58E+00
4,4'-METHYLENE DIANILINE (AND ITS DICHLORIDE)	101-77-9	6.11E-04	
METHYLENE DIPHENYL ISOCYANATE	101-68-8	1.15E+01	
MICHLER'S KETONE (4,4'-Bis(dimethylamino)benzophenone)	90-94-8	2.43E-02	
N-NITROSODI-n-BUTYLAMINE	924-16-3	1.90E-03	

Engineering Division Manual of Procedures

N-NITROSODI-n-PROPYLAMINE	621-64-7	2.99E-03	
N-NITROSODIETHYLAMINE	55-18-5	5.81E-04	
N-NITROSODIMETHYLAMINE	62-75-9	1.31E-03	
N-NITROSODIPHENYLAMINE	86-30-6	2.32E+00	
N-NITROSO-N-METHYLETHYLAMINE	10595-95-6	9.50E-04	
N-NITROSOMORPHOLINE	59-89-2	3.12E-03	
N-NITROSOPIPERIDINE	100-75-4	2.22E-03	
N-NITROSOPYRROLIDINE	930-55-2	9.96E-03	
NICKEL AND COMPOUNDS	7440-02-0	2.30E-02	2.26E-05
NICKEL ACETATE	373-02-4	6.92E-02	6.81E-05
NICKEL CARBONATE	3333-67-3	4.65E-02	4.58E-05
NICKEL CARBONYL	13463-39-3	6.68E-02	6.58E-05
NICKEL HYDROXIDE	12054-48-7	3.63E-02	3.57E-05
NICKELOCENE	1271-28-9	4.66E-02	4.58E-05
NICKEL OXIDE	1313-99-1	2.92E-02	2.88E-05
Nickel refinery dust from the pyrometallurgical process	1146	2.30E-02	2.26E-05
NICKEL SUBSULFIDE	12035-72-2	9.41E-02	9.26E-05
NITRIC ACID	7697-37-2		9.73E-03
p-NITROSODIPHENYLAMINE	156-10-5	9.50E-01	
OZONE	10028-15-6		2.04E-02
PARTICULATE EMISSIONS FROM DIESEL-FUELED ENGINES	9901	1.90E-02	
PERCHLOROETHYLENE (Tetrachloroethylene)	127-18-4	9.96E-01	2.26E+00
PHENOL	108-95-2	3.29E+03	6.56E-01
PHOSGENE	75-44-5		4.53E-04
PHOSPHINE	7803-51-2	1.32E+01	
PHOSPHORIC ACID	7664-38-2	1.15E+02	
PHTHALIC ANHYDRIDE	85-44-9	3.29E+02	
PCB (POLYCHLORINATED BIPHENYLS) (unspeciated mixture) [high risk]	1336-36-3	2.27E-04	
PCB (POLYCHLORINATED BIPHENYLS) (speciated)	N/A		
3,3',4,4'-TETRACHLOROBIPHENYL (PCB 77)	32598-13-3	2.40E-05	
3,4,4',5-TETRACHLOROBIPHENYL (PCB 81)	70362-50-4	8.01E-06	
2,3,3',4,4'-PENTACHLOROBIPHENYL (PCB 105)	32598-14-4	8.01E-05	
2,3,4,4',5-PENTACHLOROBIPHENYL (PCB 114)	74472-37-0	8.01E-05	
2,3',4,4',5-PENTACHLOROBIPHENYL (PCB 118)	31508-00-6	8.01E-05	
2,3',4,4',5'-PENTACHLOROBIPHENYL (PCB 123)	65510-44-3	8.01E-05	
3,3',4,4',5-PENTACHLOROBIPHENYL (PCB 126)	57465-28-8	2.40E-08	
2,3,3',4,4',5-HEXACHLOROBIPHENYL (PCB 156)	38380-08-4	8.01E-05	
2,3,3',4,4',5'-HEXACHLOROBIPHENYL (PCB 157)	69782-90-7	8.01E-05	
2,3',4,4',5,5'-HEXACHLOROBIPHENYL (PCB 167)	52663-72-6	8.01E-05	
3,3',4,4',5,5'-HEXACHLOROBIPHENYL (PCB 169)	32774-16-6	8.01E-08	
2,3,3',4,4',5,5'-HEPTACHLOROBIPHENYL (PCB 189)	39635-31-9	8.01E-05	

Engineering Division Manual of Procedures

POLYCHLORINATED DIBENZO-P-DIOXINS (PCDD) (Treat as 2,3,7,8-TCDD for HRA)	1086	2.66E-09
2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN	1746-01-6	2.66E-09
1,2,3,7,8-PENTACHLORODIBENZO-P-DIOXIN	40321-76-4	2.66E-09
1,2,3,4,7,8-HEXACHLORODIBENZO-P-DIOXIN	39227-28-6	2.66E-08
1,2,3,6,7,8-HEXACHLORODIBENZO-P-DIOXIN	57653-85-7	2.66E-08
1,2,3,7,8,9-HEXACHLORODIBENZO-P-DIOXIN	19408-74-3	2.66E-08
1,2,3,4,6,7,8-HEPTACHLORODIBENZO-P-DIOXIN	35822-46-9	2.66E-07
1,2,3,4,6,7,8,9-OCTACHLORODIBENZO-P-DIOXIN	3268-87-9	8.86E-06
POLYCHLORINATED DIBENZOFURANS (PCDD) (Treat as 2,3,7,8-TCDD for HRA)	1080	3.85E-09
2,3,7,8-TETRACHLORODIBENZOFURAN	51207-31-9	3.85E-08
1,2,3,7,8-PENTACHLORODIBENZOFURAN	57117-41-6	1.28E-07
2,3,4,7,8-PENTACHLORODIBENZOFURAN	57117-31-4	1.28E-08
1,2,3,4,7,8-HEXACHLORODIBENZOFURAN	70648-26-9	3.85E-08
1,2,3,6,7,8-HEXACHLORODIBENZOFURAN	57117-44-9	3.85E-08
1,2,3,7,8,9-HEXACHLORODIBENZOFURAN	72918-21-9	3.85E-08
2,3,4,6,7,8-HEXACHLORODIBENZOFURAN	60851-34-5	3.85E-08
1,2,3,4,6,7,8-HEPTACHLORODIBENZOFURAN	67562-39-4	3.85E-07
1,2,3,4,7,8,9-HEPTACHLORODIBENZOFURAN	55673-89-7	3.85E-07
1,2,3,4,6,7,8,9-OCTACHLORODIBENZOFURAN	39001-02-0	1.28E-05
POLYCYCLIC AROMATIC HYDROCARBON (PAH) [Treat as B(a)P for HRA]	1151	7.49E-05
BENZ(A)ANTHRACENE	56-55-3	7.49E-04
BENZO(A)PYRENE	50-32-8	7.49E-05
BENZO(B)FLUORANTHENE	205-99-2	7.49E-04
BENZO(J)FLUORANTHENE	205-82-3	7.49E-04
BENZO(K)FLUORANTHENE	207-08-9	7.49E-04
CHRYSENE	218-01-9	7.49E-03
DIBENZ(A,H)ACRIDINE	226-36-8	7.49E-04
DIBENZ(A,H)ANTHRACENE	53-70-3	2.13E-04
DIBENZ(A,J)ACRIDINE	224-42-0	7.49E-04
DIBENZO(A,E)PYRENE	192-65-4	7.49E-05
DIBENZO(A,H)PYRENE	189-64-0	7.49E-06
DIBENZO(A,I)PYRENE	189-55-9	7.49E-06
DIBENZO(A,L)PYRENE	191-30-0	7.49E-06
7H-DIBENZO(C,G)CARBAZOLE	194-59-2	7.49E-05
7,12-DIMETHYLBENZ(A)ANTHRACENE	57-97-6	3.49E-06
1,6-DINITROPYRENE	42397-64-8	7.49E-06
1,8-DINITROPYRENE	42397-65-9	7.49E-05
INDENO(1,2,3-C,D)PYRENE	193-39-5	7.49E-04
3-METHYLCHOLANTHRENE	56-49-5	3.97E-05
5-METHYLCHRYSENE	3697-24-3	7.49E-05
NAPHTHALENE	91-20-3	1.74E-01
5-NITROACENAPHTHENE	602-87-9	6.72E-03

Engineering Division Manual of Procedures

6-NITROCHRYSENE	7496-02-8	7.49E-06	
2-NITROFLUORENE	607-57-8	7.49E-03	
1-NITROPYRENE	5522-43-0	7.49E-04	
4-NITROPYRENE	57835-92-4	7.49E-04	
1,3-PROPANE SULTONE	1120-71-4	8.71E-03	
PROPYLENE (PROPENE)	115-07-1	4.93E+04	
PROPYLENE GLYCOL MONOMETHYL ETHER	107-98-2	1.15E+05	
PROPYLENE OXIDE	75-56-9	1.61E+00	3.51E-01
SELENIUM AND COMPOUNDS	7782-49-2	4.28E-01	
HYDROGEN SELENIDE	7783-07-5		5.66E-04
SELENIUM SULFIDE	7446-34-6	4.28E-01	
	7631-86-9		
SILICA [CRYSTALLINE, RESPIRABLE]	[1175]	4.93E+01	
SODIUM HYDROXIDE	1310-73-2		9.05E-04
STYRENE	100-42-5	1.48E+04	2.38E+00
SULFATES	9960		1.36E-02
SULFURIC ACID AND OLEUM	7664-93-9	1.64E+01	1.36E-02
SULFURIC ACID	7664-93-9	1.64E+01	1.36E-02
SULFUR TRIOXIDE	7446-71-9	1.64E+01	1.36E-02
OLEUM	8014-95-7		1.36E-02
1,1,2,2-TETRACHLOROETHANE	79-34-5	1.05E-01	
THIOACETAMIDE	62-55-5	3.43E-03	
TOLUENE	108-88-3	4.93E+03	4.19E+00
TOLUENE DIISOCYANATES	26471-62-5	5.36E-01	
TOLUENE-2,4-DIISOCYANATE	584-84-9	5.36E-01	
TOLUENE-2,6-DIISOCYANATE	91-08-7	5.36E-01	
1,1,2-TRICHLOROETHANE (Vinyl Trichloride)	79-00-5	3.67E-01	
TRICHLOROETHYLENE	79-01-6	2.99E+00	
TRIETHYLAMINE	121-44-8	3.29E+03	3.17E-01
URETHANE (Ethyl Carbamate)	51-79-6	2.09E-02	
VANADIUM COMPOUNDS	N/A		
VANADIUM (fume or dust)	7440-62-2		3.39E-03
VANADIUM PENTOXIDE	1314-62-1		3.39E-03
VINYL ACETATE	108-05-4	3.29E+03	
VINYL CHLORIDE (Chloroethylene)	75-01-4	7.74E-02	2.04E+01
VINYLDENE CHLORIDE (1,1-Dichloroethylene)	75-35-4	1.15E+03	
XYLENES (mixed isomers)	1330-20-7	1.15E+04	2.49E+00
m-XYLENE	108-38-3	1.15E+04	2.49E+00
o-XYLENE	95-47-6	1.15E+04	2.49E+00
p-XYLENE	106-42-3	1.15E+04	2.49E+00

Engineering Division Manual of Procedures

Table 4
Rule 1200 Screening Emission Rates for Volume Sources

Chemical Name	Chemical Abstract Number	Annual Emission Rate lb/yr	Hourly Emission Rate lb/hr
ACETALDEHYDE	75-07-0	7.3E-01	3.4E-02
ACETAMIDE	60-35-5	1.0E-01	
ACROLEIN	107-02-8	9.6E-01	1.8E-04
ACRYLAMIDE	79-06-1	1.6E-03	
ACRYLIC ACID	79-10-7		4.3E-01
ACRYLONITRILE	107-13-1	7.3E-03	
ALLYL CHLORIDE	107-05-1	3.5E-01	
2-AMINOANTHRAQUINONE	117-79-3	2.2E-01	
AMMONIA	7664-41-7	1.1E+03	2.3E-01
ANILINE	62-53-3	1.3E+00	
ARSENIC AND COMPOUNDS (INORGANIC)	7440-38-2	2.4E-05	1.4E-05
ARSINE	7784-42-1	2.1E-02	1.4E-05
ASBESTOS	1332-21-4	1.0E-07	
BENZENE	71-43-2	7.3E-02	1.9E-03
BENZIDINE (AND ITS SALTS)	92-87-5	1.5E-05	
BENZIDINE BASED DYES	1020	1.5E-05	
DIRECT BLACK 38	1937-37-7	1.5E-05	
DIRECT BLUE 6	2602-46-2	1.5E-05	
DIRECT BROWN 95 (technical grade)	16071-86-6	1.5E-05	
BENZYL CHLORIDE	100-44-7	4.3E-02	1.7E-02
BERYLLIUM AND COMPOUNDS	7440-41-7	8.7E-04	
BIS(2-CHLOROETHYL)ETHER (Dichloroethyl Ether)	111-44-4	2.9E-03	
BIS(CHLOROMETHYL)ETHER	542-88-1	1.6E-04	
POTASSIUM BROMATE	7758-01-2	1.5E-02	
1,3-BUTADIENE	106-99-0	1.2E-02	4.7E-02
CADMIUM AND COMPOUNDS	7440-43-9	4.9E-04	
CAPROLACTAM	105-60-2	9.6E+00	3.6E-03
CARBON DISULFIDE	75-15-0	4.6E+03	4.5E-01
CARBON TETRACHLORIDE (Tetrachloromethane)	56-23-5	4.9E-02	1.4E-01
CHLORINATED PARAFFINS	108171-26-2	8.2E-02	
CHLORINE	7782-50-5	1.1E+00	1.5E-02
CHLORINE DIOXIDE	10049-04-4	3.4E+00	
4-CHLORO-O-PHENYLENEDIAMINE	95-83-0	4.6E-01	
CHLOROBENZENE	108-90-7	5.7E+03	
CHLOROFORM	67-66-3	3.8E-01	1.1E-02
CHLOROPHENOLS	N/A		
PENTACHLOROPHENOL	87-86-5	4.1E-01	
2,4,6-TRICHLOROPHENOL	88-06-2	1.0E-01	
CHLOROPICRIN	76-06-2	2.3E+00	2.1E-03
p-CHLORO-o-TOLUIDINE	95-69-2	2.7E-02	
CHROMIUM 6+	18540-29-9	4.5E-06	
BARIUM CHROMATE	10294-40-3	2.2E-05	
CALCIUM CHROMATE	13765-19-0	1.4E-05	
LEAD CHROMATE	7758-97-6	2.8E-05	

Engineering Division Manual of Procedures

SODIUM DICHROMATE	10588-01-9	1.1E-05	
STRONTIUM CHROMATE	7789-06-2	1.8E-05	
CHROMIC TRIOXIDE (as chromic acid mist)	1333-82-0	8.7E-06	
COPPER AND COMPOUNDS	7440-50-8		7.2E-03
p-CRESIDINE	120-71-8	4.9E-02	
CRESOLS (mixtures of)	1319-77-3	3.4E+03	
M-CRESOL	108-39-4	3.4E+03	
O-CRESOL	95-48-7	3.4E+03	
P-CRESOL	106-44-5	3.4E+03	
CUPFERRON	135-20-6	3.3E-02	
Cyanide And Compounds (inorganic)	57-12-5	5.2E+01	2.4E-02
HYDROGEN CYANIDE (Hydrocyanic Acid)	74-90-8	5.2E+01	2.4E-02
2,4-DIAMINOANISOLE	615-05-4	3.2E-01	
2,4-DIAMINOTOLUENE	95-80-7	1.8E-03	
1,2-DIBROMO-3-CHLOROPROPANE (DBCP)	96-12-8	1.0E-03	
p-DICHLOROBENZENE	106-46-7	1.8E-01	
3,3-DICHLOROBENZIDINE	91-94-1	6.1E-03	
1,1,-DICHLOROETHANE (Ethylidene Dichloride)	75-34-3	1.3E+00	
DI(2-ETHYLHEXYL)PHTHALATE (DEHP)	117-81-7	5.3E-02	
DIETHANOLAMINE	111-42-2	1.7E+01	
p-DIMETHYLAMINOAZOBENZENE	60-11-7	1.6E-03	
N,N-DIMETHYL FORMAMIDE	68-12-2	4.6E+02	
2,4-DINITROTOLUENE	121-14-2	2.4E-02	
1,4-DIOXANE (1,4-Diethylene dioxide)	123-91-1	2.7E-01	2.2E-01
EPICHLOROHYDRIN (1-Chloro-2,3-epoxypropane)	106-89-8	9.1E-02	9.3E-02
1,2-EPOXYBUTANE	106-88-7	1.1E+02	
ETHYL BENZENE	100-41-4	8.4E-01	
ETHYL CHLORIDE (Chloroethane)	75-00-3	1.7E+05	
ETHYLENE DIBROMIDE (1,2-Dibromoethane)	106-93-4	2.9E-02	
ETHYLENE DICHLORIDE (1,2-Dichloroethane)	107-06-2	1.0E-01	
ETHYLENE GLYCOL	107-21-1	2.3E+03	
ETHYLENE OXIDE (1,2-Epoxyethane)	75-21-8	2.4E-02	
ETHYLENE THIOUREA	96-45-7	1.6E-01	
FLUORIDES AND COMPOUNDS	1101	4.8E+00	1.7E-02
HYDROGEN FLUORIDE (Hydrofluoric Acid)	7664-39-3	4.8E+00	1.7E-02
FORMALDEHYDE	50-00-0	3.5E-01	4.0E-03
GLUTARALDEHYDE	111-30-8	4.6E-01	
GLYCOL ETHERS	N/A		
ETHYLENE GLYCOL BUTYL ETHER – EGBE	111-76-2		1.0E+00
ETHYLENE GLYCOL ETHYL ETHER – EGEE	110-80-5	4.0E+02	2.7E-02
ETHYLENE GLYCOL ETHYL ETHER ACETATE – EGEEA	111-15-9	1.7E+03	1.0E-02
ETHYLENE GLYCOL METHYL ETHER – EGME	109-86-4	3.4E+02	6.7E-03
ETHYLENE GLYCOL METHYL ETHER ACETATE – EGMEA	110-49-6	5.2E+02	
HEXACHLOROBENZENE	118-74-1	4.1E-03	
HEXACHLOROCYCLOHEXANES (mixed or technical grade)	608-73-1	1.1E-04	
alpha-HEXACHLOROCYCLOHEXANE	319-84-6	1.1E-04	
beta- HEXACHLOROCYCLOHEXANE	319-85-7	1.1E-04	
gamma-HEXACHLOROCYCLOHEXANE (Lindane)	58-89-9	3.9E-04	

Engineering Division Manual of Procedures

n-HEXANE	110-54-3	4.0E+04	
HYDRAZINE	302-01-2	4.3E-04	
HYDROCHLORIC ACID (Hydrogen Chloride)	7647-01-0	5.2E+01	1.5E-01
HYDROGEN SULFIDE	7783-06-4	5.7E+01	3.0E-03
ISOPHORONE	78-59-1	1.1E+04	
ISOPROPYL ALCOHOL (Isopropanol)	67-63-0	4.0E+04	2.3E-01
LEAD AND COMPOUNDS (inorganic)	7439-92-1	6.5E-03	
LEAD ACETATE	301-04-2	1.0E-02	
LEAD PHOSPHATE	7446-27-7	8.5E-03	
LEAD SUBACETATE	1335-32-6	8.5E-03	
MALEIC ANHYDRIDE	108-31-6	4.0E+00	
MANGANESE AND COMPOUNDS	7439-96-5	2.3E-01	
MERCURY AND COMPOUNDS (INORGANIC)	7439-97-6	1.7E-02	4.3E-05
MERCURIC CHLORIDE	7487-94-7	1.7E-02	4.3E-05
METHANOL	67-56-1	2.3E+04	2.0E+00
METHYL BROMIDE (Bromomethane)	74-83-9	2.9E+01	2.8E-01
METHYL tertiary-BUTYL ETHER	1634-04-4	4.1E+00	
METHYL CHLOROFORM (1,1,1-Trichloroethane)	71-55-6	5.7E+03	4.9E+00
METHYL ETHYL KETONE (2-Butanone)	78-93-3		9.3E-01
METHYL ISOCYANATE	624-83-9	5.7E+00	
4,4'-METHYLENE BIS (2-CHLOROANILINE) (MOCA)	101-14-4	4.9E-03	
METHYLENE CHLORIDE (Dichloromethane)	75-09-2	2.1E+00	1.0E+00
4,4'-METHYLENE DIANILINE (AND ITS DICHLORIDE)	101-77-9	2.1E-04	
METHYLENE DIPHENYL ISOCYANATE	101-68-8	4.0E+00	
MICHLER'S KETONE (4,4'- Bis(dimethylamino)benzophenone)	90-94-8	8.5E-03	
N-NITROSODI-n-BUTYLAMINE	924-16-3	6.6E-04	
N-NITROSODI-n-PROPYLAMINE	621-64-7	1.0E-03	
N-NITROSODIETHYLAMINE	55-18-5	2.0E-04	
N-NITROSODIMETHYLAMINE	62-75-9	4.6E-04	
N-NITROSODIPHENYLAMINE	86-30-6	8.1E-01	
N-NITROSO-N-METHYLETHYLAMINE	10595-95-6	3.3E-04	
N-NITROSOMORPHOLINE	59-89-2	1.1E-03	
N-NITROSOPIPERIDINE	100-75-4	7.8E-04	
N-NITROSPYRROLIDINE	930-55-2	3.5E-03	
NICKEL AND COMPOUNDS	7440-02-0	8.0E-03	1.4E-05
NICKEL ACETATE	373-02-4	2.4E-02	4.3E-05
NICKEL CARBONATE	3333-67-3	1.6E-02	2.9E-05
NICKEL CARBONYL	13463-39-3	2.3E-02	4.2E-05
NICKEL HYDROXIDE	12054-48-7	1.3E-02	2.3E-05
NICKELOCENE	1271-28-9	1.6E-02	2.9E-05
NICKEL OXIDE	1313-99-1	1.0E-02	1.8E-05
Nickel refinery dust from the pyrometallurgical process	1146	8.0E-03	1.4E-05
NICKEL SUBSULFIDE	12035-72-2	3.3E-02	5.9E-05
NITRIC ACID	7697-37-2		6.2E-03
p-NITROSODIPHENYLAMINE	156-10-5	3.3E-01	
OZONE	10028-15-6		1.3E-02
PARTICULATE EMISSIONS FROM DIESEL-FUELED ENGINES	9901	6.6E-03	
PERCHLOROETHYLENE (Tetrachloroethylene)	127-18-4	3.5E-01	1.4E+00

Engineering Division Manual of Procedures

PHENOL	108-95-2	1.1E+03	4.2E-01
PHOSGENE	75-44-5		2.9E-04
PHOSPHINE	7803-51-2	4.6E+00	
PHOSPHORIC ACID	7664-38-2	4.0E+01	
PHTHALIC ANHYDRIDE	85-44-9	1.1E+02	
PCB (POLYCHLORINATED BIPHENYLS) (unspeciated mixture) [high risk]	1336-36-3	7.9E-05	
PCB (POLYCHLORINATED BIPHENYLS) (speciated)	N/A		
3,3',4,4'-TETRACHLOROBIPHENYL (PCB 77)	32598-13-3	8.4E-06	
3,4,4',5-TETRACHLOROBIPHENYL (PCB 81)	70362-50-4	2.8E-06	
2,3,3',4,4'-PENTACHLOROBIPHENYL (PCB 105)	32598-14-4	2.8E-05	
2,3,4,4',5-PENTACHLOROBIPHENYL (PCB 114)	74472-37-0	2.8E-05	
2,3',4,4',5-PENTACHLOROBIPHENYL (PCB 118)	31508-00-6	2.8E-05	
2,3',4,4',5'-PENTACHLOROBIPHENYL (PCB 123)	65510-44-3	2.8E-05	
3,3',4,4',5-PENTACHLOROBIPHENYL (PCB 126)	57465-28-8	8.4E-09	
2,3,3',4,4',5-HEXACHLOROBIPHENYL (PCB 156)	38380-08-4	2.8E-05	
2,3,3',4,4',5'-HEXACHLOROBIPHENYL (PCB 157)	69782-90-7	2.8E-05	
2,3',4,4',5,5'-HEXACHLOROBIPHENYL (PCB 167)	52663-72-6	2.8E-05	
3,3',4,4',5,5'-HEXACHLOROBIPHENYL (PCB 169)	32774-16-6	2.8E-08	
2,3,3',4,4',5,5'-HEPTACHLOROBIPHENYL (PCB 189)	39635-31-9	2.8E-05	
POLYCHLORINATED DIBENZO-P-DIOXINS (PCDD) (Treat as 2,3,7,8-TCDD for HRA)	1086	9.3E-10	
2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN	1746-01-6	9.3E-10	
1,2,3,7,8-PENTACHLORODIBENZO-P-DIOXIN	40321-76-4	9.3E-10	
1,2,3,4,7,8-HEXACHLORODIBENZO-P-DIOXIN	39227-28-6	9.3E-09	
1,2,3,6,7,8-HEXACHLORODIBENZO-P-DIOXIN	57653-85-7	9.3E-09	
1,2,3,7,8,9-HEXACHLORODIBENZO-P-DIOXIN	19408-74-3	9.3E-09	
1,2,3,4,6,7,8-HEPTACHLORODIBENZO-P-DIOXIN	35822-46-9	9.3E-08	
1,2,3,4,6,7,8,9-OCTACHLORODIBENZO-P-DIOXIN	3268-87-9	3.1E-06	
POLYCHLORINATED DIBENZOFURANS (PCDD) (Treat as 2,3,7,8-TCDD for HRA)	1080	1.3E-09	
2,3,7,8-TETRACHLORODIBENZOFURAN	51207-31-9	1.3E-08	
1,2,3,7,8-PENTACHLORODIBENZOFURAN	57117-41-6	4.5E-08	
2,3,4,7,8-PENTACHLORODIBENZOFURAN	57117-31-4	4.5E-09	
1,2,3,4,7,8-HEXACHLORODIBENZOFURAN	70648-26-9	1.3E-08	
1,2,3,6,7,8-HEXACHLORODIBENZOFURAN	57117-44-9	1.3E-08	
1,2,3,7,8,9-HEXACHLORODIBENZOFURAN	72918-21-9	1.3E-08	
2,3,4,6,7,8-HEXACHLORODIBENZOFURAN	60851-34-5	1.3E-08	
1,2,3,4,6,7,8-HEPTACHLORODIBENZOFURAN	67562-39-4	1.3E-07	
1,2,3,4,7,8,9-HEPTACHLORODIBENZOFURAN	55673-89-7	1.3E-07	
1,2,3,4,6,7,8,9-OCTACHLORODIBENZOFURAN	39001-02-0	4.5E-06	
POLYCYCLIC AROMATIC HYDROCARBON (PAH) [Treat as B(a)P for HRA]	1151	2.6E-05	
BENZ(A)ANTHRACENE	56-55-3	2.6E-04	
BENZO(A)PYRENE	50-32-8	2.6E-05	
BENZO(B)FLUORANTHENE	205-99-2	2.6E-04	
BENZO(J)FLUORANTHENE	205-82-3	2.6E-04	
BENZO(K)FLUORANTHENE	207-08-9	2.6E-04	
CHRYSENE	218-01-9	2.6E-03	
DIBENZ(A,H)ACRIDINE	226-36-8	2.6E-04	
DIBENZ(A,H)ANTHRACENE	53-70-3	7.4E-05	
DIBENZ(A,J)ACRIDINE	224-42-0	2.6E-04	

Engineering Division Manual of Procedures

DIBENZO(A,E)PYRENE	192-65-4	2.6E-05	
DIBENZO(A,H)PYRENE	189-64-0	2.6E-06	
DIBENZO(A,I)PYRENE	189-55-9	2.6E-06	
DIBENZO(A,L)PYRENE	191-30-0	2.6E-06	
7H-DIBENZO(C,G)CARBAZOLE	194-59-2	2.6E-05	
7,12-DIMETHYLBENZ(A)ANTHRACENE	57-97-6	1.2E-06	
1,6-DINITROPYRENE	42397-64-8	2.6E-06	
1,8-DINITROPYRENE	42397-65-9	2.6E-05	
INDENO(1,2,3-C,D)PYRENE	193-39-5	2.6E-04	
3-METHYLCHOLANTHRENE	56-49-5	1.4E-05	
5-METHYLCHRYSENE	3697-24-3	2.6E-05	
NAPHTHALENE	91-20-3	6.1E-02	
5-NITROACENAPHTHENE	602-87-9	2.3E-03	
6-NITROCHRYSENE	7496-02-8	2.6E-06	
2-NITROFLUORENE	607-57-8	2.6E-03	
1-NITROPYRENE	5522-43-0	2.6E-04	
4-NITROPYRENE	57835-92-4	2.6E-04	
1,3-PROPANE SULTONE	1120-71-4	3.0E-03	
PROPYLENE (PROPENE)	115-07-1	1.7E+04	
PROPYLENE GLYCOL MONOMETHYL ETHER	107-98-2	4.0E+04	
PROPYLENE OXIDE	75-56-9	5.6E-01	2.2E-01
SELENIUM AND COMPOUNDS	7782-49-2	1.5E-01	
HYDROGEN SELENIDE	7783-07-5		3.6E-04
SELENIUM SULFIDE	7446-34-6	1.5E-01	
	7631-86-9		
SILICA [CRYSTALLINE, RESPIRABLE]	[1175]	1.7E+01	
SODIUM HYDROXIDE	1310-73-2		5.8E-04
STYRENE	100-42-5	5.2E+03	1.5E+00
SULFATES	9960		8.6E-03
SULFURIC ACID AND OLEUM	7664-93-9	5.7E+00	8.6E-03
SULFURIC ACID	7664-93-9	5.7E+00	8.6E-03
SULFUR TRIOXIDE	7446-71-9	5.7E+00	8.6E-03
OLEUM	8014-95-7		8.6E-03
1,1,2,2-TETRACHLOROETHANE	79-34-5	3.7E-02	
THIOACETAMIDE	62-55-5	1.2E-03	
TOLUENE	108-88-3	1.7E+03	2.7E+00
TOLUENE DIISOCYANATES	26471-62-5	1.9E-01	
TOLUENE-2,4-DIISOCYANATE	584-84-9	1.9E-01	
TOLUENE-2,6-DIISOCYANATE	91-08-7	1.9E-01	
1,1,2-TRICHLOROETHANE (Vinyl Trichloride)	79-00-5	1.3E-01	
TRICHLOROETHYLENE	79-01-6	1.0E+00	
TRIETHYLAMINE	121-44-8	1.1E+03	2.0E-01
URETHANE (Ethyl Carbamate)	51-79-6	7.3E-03	
VANADIUM COMPOUNDS	N/A		
VANADIUM (fume or dust)	7440-62-2		2.2E-03
VANADIUM PENTOXIDE	1314-62-1		2.2E-03
VINYL ACETATE	108-05-4	1.1E+03	
VINYL CHLORIDE (Chloroethylene)	75-01-4	2.7E-02	1.3E+01
VINYLDIENE CHLORIDE (1,1-Dichloroethylene)	75-35-4	4.0E+02	
XYLENES (mixed isomers)	1330-20-7	4.0E+03	1.6E+00
m-XYLENE	108-38-3	4.0E+03	1.6E+00

Engineering Division Manual of Procedures

o-XYLENE	95-47-6	4.0E+03	1.6E+00
p-XYLENE	106-42-3	4.0E+03	1.6E+00

References:

Air Toxics "Hot Spots" Program Guidance Manual for the Preparation of Risk Assessemnts (Guidance Manual) – SRP Draft [10/14/14]

Air Toxics "Hot Spots" Program Risk Assessment Guidelines Technical Support Document for the Derivation of Noncancer Reference Exposure Levels. [12/19/08]

Air Toxics "Hot Spots" Program Risk Assessment Guidelines Part II: Technical Support Document for Cancer Potency Factors. [06/01/09]

Air Toxics Hot Spots Program Risk Assessment Guidelines: Technical Support Document for Exposure Assessment and Stochastic Analysis, [08/27/12]

5.2 Rule 1200 Requirements for Health Risk Assessment (Tom Weeks, February 2001, modified April 2009)

This document indicates the level of HRA review anticipated under Rule 1200 and the fees and supplemental information that should be submitted with the permit applications to allow expeditious review. It is the basis of the HRA time estimates used in the Application Fee Deposit Reference Sheet (see Section 2.4 above).

Category 1 and 2 applications are expected to pass a screening level HRA using “look-up” tables and generally will require approximately one hour of evaluation time. Category 3 applications are expected to require a site specific screening HRA using a simple dispersion model and will require approximately four hours of evaluation time. Category 4 applications are expected to require a refined site specific HRA. The Toxics Section must be consulted concerning the required evaluation time for Category 4 applications.

Permit engineers must be notified by the Toxics Section if actual costs incurred will exceed the initial estimate and the permit engineer must prepare an invoice for the additional fees prior to the additional analysis unless approved by a senior engineer.

HRA REVIEW CATEGORY

CATEGORY 0 - NO ANALYSIS REQUIRED (NEGLIGIBLE TOXIC EMISSIONS OR EXEMPT)

CATEGORY 1 - EXPECTED TO PASS HRA USING SCREENING EMISSION RATE TABLES

CATEGORY 2 - EXPECTED TO PASS HRA USING DISPERSION LOOK-UP TABLES

CATEGORY 3 - EXPECTED TO PASS SCREENING HRA

CATEGORY 4 - REFINED HRA REQUIRED

Engineering Division Manual of Procedures

NOTES AND QUALIFIERS

A - HRA required only if materials containing chromium, nickel, lead, or copper are used or processed.

B - Facility uses propane or natural gas as fuel and annually cremates less than 300 human bodies or
43,200 lbs of remains (human or animal)

C - HRA not required if electrically heated.

D - HRA required only if Rule 1200 listed materials are processed, produced or otherwise used.

E - HRA not required if the P/O is issued with a throughput limitation that assures risks are < 100E-6 and HHI 10.0

G - HRA not required if 2 gallons per day or less of all graphic arts materials are used (minus water)

H - Should be Category 4 if initial application review indicates that a refined HRA is required or is provided with the application for review.

FEE SCHEDULE

CATEGORY, QUALIFIER

SCHEDULE 1: Abrasive Blasting Equipment Excluding Rooms and Booths

- | | |
|--|------|
| (a) Pot 100 Pounds Capacity or Larger with no Peripheral Equipment | 2, A |
| (b) Pot 100 Pounds Capacity or Larger Loaded Pneumatically or from Storage Hoppers | 2, A |
| (c) Bulk Abrasive Blasting Material Storage System | 2, A |
| (d) Spent Abrasive Handling System | 2, A |
| (x) Portable Abrasive Blasting Unit, Registration Under Rule 12.1 | 0 |

SCHEDULE 2: Abrasive Blasting Cabinets, Rooms and Booths

- | | |
|--|------|
| (a) Abrasive Blasting Cabinet, Room or Booth | 1, A |
| (b) Cabinet, Room or Booth with an Abrasive Transfer or Recycle System | 1, A |

SCHEDULE 3: Asphalt Roofing Kettles and Tankers used to Store Heat, Transport, and Transfer Hot Asphalt

- | | |
|---|---|
| (a) Kettle or Tanker with Capacity Greater than 85 Gallons | 0 |
| (b) Kettle or Tanker with Capacity Greater than 85 Gallons and Requiring Emission Control Equipment | 0 |
| (w) Asphalt Roofing Kettles and Tankers, Registration Under Rule 12 | 0 |
| (z) Asphalt Roofing Kettles and Tankers, Registration Under Rule 12, Conversion from Valid Permit | 0 |

SCHEDULE 4: Hot-Mix Asphalt Paving Batch Plants	3
---	---

SCHEDULE 5: Rock Drills

- | | |
|---|---|
| (a) Drill with Water Controls | 1 |
| (b) Drill with Controls other than Water | 1 |
| (w) Drill, Registration Under Rule 12 | 0 |
| (z) Drill, Registration Under Rule 12, Conversion from Valid Permit | 0 |

Engineering Division Manual of Procedures

SCHEDULE 6: Sand, Rock, and Aggregate Screens, when not used in Conjunction with other Permit Items in these Schedules

- | | | |
|-----|---|---|
| (a) | Screen Set | 1 |
| (x) | Portable Sand and Gravel Screen, Registration Under Rule 12.1 | 0 |

SCHEDULE 7: Sand, Rock, and Aggregate Plants 3

- | | | |
|-----|---|---|
| (a) | Crusher System | 3 |
| (b) | Screening System | 3 |
| (c) | Loadout System | 3 |
| (d) | Aggregate Dryer System | 3 |
| (x) | Portable Rock Crushing System, Registration Under Rule 12.1 | 0 |

SCHEDULE 8: Concrete Batch Plants, Concrete Mixers Over One Cubic Yard Capacity and Separate Cement Silo System 3

- | | | |
|-----|---|---|
| (a) | Concrete Batch Plant (including Cement-Treated Base Plants) | 3 |
| (b) | Mixer over One Cubic Yard Capacity | 3 |
| (c) | Cement or Fly Ash Silo System not part of another system requiring a permit | 3 |
| (x) | Portable Concrete Batch Plant, Registration Under Rule 12.1 | 0 |

SCHEDULE 9: Concrete Product Manufacturing Plants 2

SCHEDULE 10: Brick Manufacturing Plants 1

- | | | |
|-----|------------------------------------|---|
| (a) | Clay Batching and Extruding System | 1 |
| (b) | Crusher-Screen System | 1 |
| (c) | Kiln | 3 |

SCHEDULE 11: Tire Buffers 0

SCHEDULE 12: Fish Canneries and Smoke Houses 1

- | | | |
|-----|---|---|
| (a) | Dryer (also called Meal Drying and Grinding System) | 1 |
| (b) | Precooker | 1 |
| (c) | Vat and Vibrating Screen System | 1 |
| (d) | Scrap Cooker and Grinder System | 1 |
| (e) | Cooker | 1 |
| (f) | Dry Pet Food Processing System | 1 |
| (g) | Digester Tank | 1 |
| (h) | Smoke House | 1 |
| (i) | Loadout System | 1 |

SCHEDULE 13: Boilers and Heaters

- | | | |
|-----|---|------|
| (a) | 1 MM BTU/HR up to but not including 50 MM BTU/HR Input | 2 |
| (b) | 50 MM BTU/HR up to but not including 250 MM BTU/HR Input | 3, H |
| (c) | 250 MM BTU/HR up to 1050 MM BTU/HR Input or up to but not including 100 Megawatt Gross Output whichever is Greater (Based on an Average Boiler Efficiency of 32.5%) | 3, H |
| (d) | 100 Megawatt Gross Output or Greater (Based on an Average Boiler Efficiency of 32.5%) | 3, H |
| (f) | 1 MM BTU/HR up to but not including 50 MM BTU/HR Input at a Single Site where more than 5 such Units are Located | 3, H |

Engineering Division Manual of Procedures

- (g) Notice of Intention - 250 MM BTU/HR up to 1050 BTU/HR or up to but not including 100 Megawatt Output 3, H
- (h) Notice of Intention - Each 100 Megawatt Output or Greater 3, H

SCHEDULE 14: Non-Municipal Incinerators

- (a) Waste Burning Capacity up to and including 100 LBS/HR 2, B
- (b) Waste Burning Capacity Greater than 100 LBS/HR 2, B
- (c) Burning Capacity up to and including 50 LBS/HR used exclusively for the Incineration or Cremation of Animals 2, B
- (d) Emission Controls or Modifications 0

SCHEDULE 15: Burn Out Ovens

- (b) Wire Reclamation Oven 2
- (c) IC Engine Parts Refurbishing Unit 2
- (z) Navy: Burn Out IC Engine Parts (98-99 Only) 0

SCHEDULE 16: Core and Plastics Annealing/Softening Ovens

- (a) Core Oven 2
- (b) Plastic Annealing/Softening Ovens 0, C

SCHEDULE 17: Brake Debonders 1

SCHEDULE 18: Metal Melting Devices

- (a) Sweat Furnace 2
- (b) Electric Arc Furnace 2
- (c) Pit or Stationary Crucible 2
- (d) Pot Furnace 3
- (e) Induction Furnace 3
- (f) Cupola 3
- (g) Reverberatory Furnace 3
- (h) Brass Metal Melting Furnace - U.S. Navy 3

SCHEDULE 19: Oil Quenching and Salt Baths 1

SCHEDULE 20: Gas Turbine Engines, Test Cells and Test Stands

GAS TURBINE, TURBOSHAFT, TURBOJET & TURBOFAN ENGINE TEST CELLS AND STANDS

- (a) Aircraft Propulsion Turbine, Turboshift, Turbojet or Turbofan Engine Test Cell or Stand 2
- (b) Aircraft Propulsion Test Cell or Stand at a Facility where more than one such Unit is located 2
- (c) Non-Aircraft Turbine Test Cell or Test Stand 2

GAS TURBINE ENGINES

- (d) Non-Aircraft Turbine Engine 1 MM BTU/HR up to but not including 50 MM BTU/HR input 1
- (e) Non-Aircraft Turbine Engine 50 MM BTU/HR up to but not including 250 MM BTU/HR input 2
- (f) Non-Aircraft Turbine Engine 250 MM BTU/HR or greater input 3

Engineering Division Manual of Procedures

(g) Unit used solely for Peak Load Electric Generation	3
(h) Standby Gas Turbines used for Emergency Power Generation	1

SCHEDULE 21: Waste Disposal and Reclamation Units

(a) Paper or Wood Shredder or Hammermill Grinder	0
(b) Metal Shredder	0
(c) Garbage and Refuse Shredder	1
(d) Air Classifier	1
(e) Dryer	0

SCHEDULE 22: Feed and Grain Mills and Kelp Processing Plants

(a) Receiving System (includes Silos)	0
(b) Grinder, Cracker, or Roll Mill	0
(c) Shaker Stack, Screen Set, Pelletizer System, Grain Cleaner, or Hammermill	0
(d) Mixer System	0
(e) Truck or Rail Loading System	0

SCHEDULE 23: Bulk Terminal Grain and Dry Chemical Transfer and Storage Facility Equipment

(a) Receiving System (Railroad, Ship and Truck Unloading)	1
(b) Storage Silo System	1
(c) Loadout Station System	1
(d) Belt Transfer Station	1

SCHEDULE 24: Dry Chemical Mixing and Detergent Spray Towers

(a) Grain Mixing System (Includes Receiving, Transfer, Mixing or Blending, Storage, Loadout Bagging)	1
(b) Detergent Spray Tower	1
(c) Dry Chemical Mixers with capacity over One-Half Cubic Yard	1

SCHEDULE 25: Volatile Organic Compound Terminals, Bulk Plants and Intermediate Refueler Facilities

PART 1 - BULK PLANTS AND BULK TERMINALS EQUIPPED WITH OR PROPOSED TO BE EQUIPPED WITH A PROCESSOR

(a) Per Tank	3
(b) Tank Rim Seal Replacement	0
(c) Per Truck Loading Head	3
(d) Per Vapor Processor	3

PART 2 - BULK PLANTS NOT EQUIPPED WITH OR NOT PROPOSED TO BE EQUIPPED WITH A VAPOR PROCESSOR

(e) Per Tank	2
(f) Per Truck Loading Head	2

PART 3 - FACILITIES FUELING INTERMEDIATE REFUELERS (IR) FOR SUBSEQUENT FUELING OF MOTOR VEHICLES, BOATS OR AIRCRAFT

(h) Per IR Loading Connector	2
------------------------------	---

SCHEDULE 26: Non-Bulk Volatile Organic Compound Dispensing Facilities Subject to District Rules 61.0 thru 61.6

(a) Phase I and Phase II Vapor Recovery Facility	0, E
--	------

Engineering Division Manual of Procedures

- (b) Replacement or Addition of Tanks at a Permitted Facility 0, E
- (c) Facilities where only Phase I controls are required 0, E
- (d) Addition of Nozzles at Permitted Facilities where Phase II is required 0, E
- (e) Non-Retail Facilities with 250-550 Gallon Tanks and no other Non-Bulk Gasoline Dispensing Permits 0, E
- (f) Phase II Bootless or Mini-Booted Nozzles Vacuum Assist Systems Facility 0, E

SCHEDULE 27: Application of Materials Containing Organic Solvents (includes coatings, adhesives, and other materials containing volatile organic compounds (VOC))

PART 1 - MARINE COATINGS

- (t) Marine Coating Application at Facilities where combined coating and cleaning solvents usage is < 3 gallons/day and <100 gallons/year 1
- (a) Marine Coating Application at Facilities emitting < 10 tons/year of VOC from Marine Coating Operations 3
- (b) Marine Coating Application at Facilities emitting ≥ 10 tons/year of VOC from Marine Coating Operations 3
- (c) Each additional Marine Coating Permit Unit 2

PART 2 - INDUSTRIAL MATERIAL APPLICATIONS and MANUFACTURING

- (d) Surface Coating Application Station using > 1 gallon/day without Control Equipment and not covered by other Fee Schedules at Facilities emitting < 5 tons/year 2
- (e) Surface Coating Application Station without Control Equipment and not covered by other Fee Schedules at Facilities emitting ≥ 5 tons/year 2
- (f) Fiberglass, Plastic or Foam Product Process Line at Facilities emitting < 10 tons/year from these types of Operations 3
- (g) Fiberglass, Plastic or Foam Product Process Line at Facilities emitting ≥ 10 tons/year from these types of Operations 3
- (i) Surface Coating Application Station requiring Control Equipment 3
- (j) Surface Coating Application Station Subject to Rules 67.3 or 67.9 without Control Equipment at Facilities emitting < 5 tons/year 2
- (k) Surface Coating Application Station Subject to Rules 67.3 or 67.9 without Control Equipment at Facilities emitting ≥ 5 tons/year 2
- (l) Wood Products Coating Application Station without Control Equipment at Facilities emitting < 5 tons/year and using > 500 gallons/year 2
- (m) Wood Products Coating Application Station without Control Equipment at Facilities emitting ≥ 5 tons/year 3
- (n) Press or Operation at a Printing or Graphic Arts Facility Subject to Rule 67.16 0, G
- (o) Union Tribune Publishing Graphic Arts Operation 1, G
- (p) Surface Coating Application Station without Control Equipment where combined coating and cleaning solvent usage is < 1 gallon/day or ≤ 50 gallons/year 1
- (q) Wood Products Coating Application Station without Control Equipment at Facilities using ≤ 500 gallons/year 1

PART 3 - AUTOMOTIVE PAINTING

- (r) Facility applying < 5 gallons/day of Coating Materials Subject to Rule 67.20 (as applied or sprayed) 1
- (s) Facility applying ≥ 5 gallons/day of Coating Materials Subject to Rule 67.20 (as applied or sprayed) 1

Engineering Division Manual of Procedures

PART 4 - ADHESIVE MATERIALS APPLICATION OPERATIONS

- | | |
|---|---|
| (u) Adhesive Materials Application Station without Control Equipment at Facilities emitting < 5 tons/year of VOC | 2 |
| (v) Adhesive Materials Application Station without Control Equipment at Facilities emitting \geq 5 tons/year of VOC | 2 |
| (w) Adhesive Materials Application Station without Control Equipment using < 55 gallons/year of Adhesive Materials | 1 |

SCHEDULE 28: Vapor and Cold Solvent Cleaning Operations and Metal Inspection Tanks

- | | |
|--|------|
| (a) Vapor Degreaser (> 5 sq. ft.) | 1 |
| (b) Cold Solvent Degreaser (> 5 sq. ft.) | 0 |
| (c) Corrosion Control Carts | 1 |
| (d) Paint Stripping Tanks | 3 |
| (e) Vapor Phase Solder Reflow Unit | 1 |
| (f) Remote Reservoir Cleaners | 0, D |
| (h) Vapor Degreaser (< 5 sq. ft.) | 0, D |
| (i) Cold Solvent Degreaser (< 5 sq. ft.) | 0, D |
| (j) Metal Inspection Tanks | 1 |
| (k) Contract Service Remote Reservoir Cleaners | 0, D |
| (l) Small Contract Service Cold Degreasers (< 5 sq. ft.) | 0 |
| (m) Facility-Wide Solvent Application Operations | 2 |

SCHEDULE 29: Solder Levelers and Hydrosqueegees

SCHEDULE 30: Kelp and Biogum Products Solvent Dryer

SCHEDULE 31: Dry Cleaning Facilities

- | | |
|---|------|
| (a) Facility using Halogenated Hydrocarbon Solvents required to install Control Equipment | 1, E |
| (b) Facility using Petroleum Based Solvents | 0, D |
| (c) Facility using Solvents not required to install Control Equipment | 1 |

SCHEDULE 32: Acid Chemical Milling, Copper Etching and Hot Dip Galvanizing

- | | |
|--------------------------------|---|
| (a) Copper Etching Tank | 3 |
| (b) Acid Chemical Milling Tank | 3 |
| (c) Hot Dip Galvanizing Tank | 3 |

SCHEDULE 33: Can and Coil Manufacturing and Coating Operations

- | | |
|--|---|
| (a) Process Line Applying \geq 1000 Gallons/Year | 2 |
| (b) Research and Development Coil Coating Line | 2 |
| (c) Process Line Applying <1000 Gallons Per Year | 1 |

SCHEDULE 34: Piston Type Internal Combustion Engines

- | | |
|---|---|
| (a) Cogeneration Engine with In-Stack Emission Controls | 2 |
| (b) Cogeneration Engine with Engine Design Emission Controls | 2 |
| (c) Emergency Standby Engine (for electrical or fuel interruptions beyond control of Permittee) | 2 |
| (d) Engine for Non-Emergency and Non-Cogeneration Operation | 1 |
| (e) Grouping of Engines (\geq 200 Horsepower) for Dredging or Crane Operation | 2 |
| (f) Diesel Pile-Driving Hammer | 2 |

Engineering Division Manual of Procedures

(g) Engine for Non-Emergency and Non-Cogeneration Operation (< 200 Horsepower)	2
(w) Specific Eligible Engines, Registration Under Rule 12	0
(x) Specific Eligible Portable Engines, Registration Under Rule 12.1	0
(z) Specific Eligible Engines, Registration Under Rule 12, Conversion from Valid Permit	0
 SCHEDULE 35: Bulk Flour, Powered Sugar and Dry Chemical Storage System	 0, D
 SCHEDULE 36: Grinding Booths and Rooms	 0, D
 SCHEDULE 37: Plasma Electric and Ceramic Deposition Spray Booths	 2
 SCHEDULE 38: Paint, Stain, Ink, Solder Paste, and Dielectric Paste Manufacturing	
(a) Paint, Stain or Ink Manufacturing Lines Producing $\geq 10,000$ Gallons	2
(b) Can Filling Lines	2
(c) Each Process Line for Solder Paste or Dielectric Paste Manufacturing	2
(d) Paint, Stain or Ink Manufacturing Lines Producing <10,000 Gallons	2
 SCHEDULE 39: Precious Metals Refining	 2, A
 SCHEDULE 40: Asphalt Pavement Heaters/Recyclers	
(a) Processor	1
 SCHEDULE 41: Perlite Processing	 0
 SCHEDULE 42: Electronic Component Manufacturing	 1
(a) Electronic Manufacturing Operations	1
(b) Electronic Manufacturing Screen Printing	1
(c) Electronic Manufacturing Coating/Maskant Application Excluding Conformal Operations	1
(d) Electronic Manufacturing Conformal Coating	1
(e) Electronic Manufacturing Facility-wide Solvent Application	1
 SCHEDULE 43: Ceramic Slip Casting	 1
 SCHEDULE 44: Evaporators, Dryers, & Stills Processing Organic Materials	
(a) Evaporators and Dryers	2
(b) Solvent Recovery Stills	2
 SCHEDULE 45: Rubber Mixers	 0
 SCHEDULE 46: Reverse Osmosis Membrane Manufacturing	 3
 SCHEDULE 47: Organic Gas Sterilizers	 2
(a) Organic Gas Sterilizers requiring control	2
(b) Stand Alone Organic Gas Aerator requiring control	2
(c) Organic Gas Sterilizer not requiring control	2
(d) Stand Alone Organic Gas Aerator not requiring control	2

Engineering Division Manual of Procedures

SCHEDULE 48: Municipal Waste Storage and Processing

(a) Sanitary Landfill	3
(b) Temporary Storage and/or Transfer Station	2
(c) Landfill Gas Flare or Containment System	3
(d) Municipal Waste Incinerator	4
(e) North County Resource Recovery	3

SCHEDULE 49: (a) Non-Operational Status Equipment	
(b) Activating Non-Operational Status Equipment	0

SCHEDULE 50: Coffee Roasters	1
------------------------------	---

SCHEDULE 51: Industrial Waste Water Treatment

(a) Processing Line - Onsite	3
(b) Processing Line - Offsite	3

SCHEDULE 52: Air Stripping and Soil Remediation Equipment

(a) Air Stripping Equipment	3
(b) Soil Remediation Equipment - Onsite	3
(c) Soil Remediation Equipment - Offsite	4

SCHEDULE 53: Lens Casting Equipment

(a) Lens Casting Equipment	3
(b) Lens Coating Equipment	2

SCHEDULE 54: Pharmaceutical Manufacturing

(a) Pharmaceutical Manufacturing	1
(b) Protein Synthesis Employing Solvents	1

SCHEDULE 55: Hexavalent Chromium Plating & Chromic Acid Anodizing

(a) Emissions Collection System serving one or more Plating and/or Anodizing Tank(s)	3
(b) Decorative Plating Tank(s) Only	3
(c) Hard Chrome Plating or Chromic Acid Tank	3

SCHEDULE 56: Sewage Treatment Facilities

(a) Sewage Treatment Facility	3
(b) Wastewater Odor Treatment System that is not part of a Permitted Sewage Treatment Facility	3
(c) Sewage Sludge Composting Facility	2

SCHEDULE 57: Laundry Facilities Processing Material Containing Organic Compounds	2
--	---

SCHEDULE 58: Bakeries	0
-----------------------	---

5.3 Supplemental Guidance For Rule 1200 HRA Review (Tom Weeks, September 2004)

Engineering Division Manual of Procedures

The following guidance shall be followed when performing Rule 1200 Health Risk Assessments.

Toxics New Source Review (TNSR) Labor Tracking and Cost Accounting -Toxics New Source Review (Rule 1200) applies to any new, relocated, or modified emission unit which may increase emissions of one or more toxic air contaminant and for which an Authority to Construct or Permit to Operate is required pursuant to Rule 10. Rule 40(d)(5) allows the District to recover fees for TNSR analysis by charging additional engineering evaluation fees. Estimated HRA review time is presented in the Engineering Division MOP Section 5.2.

Recent review of T&M applications indicates that HRA fees are not consistently collected and that labor time is not always tracked correctly. Fees must be collected for all sources that undergo TNSR. Facilities that undergo TNSR should be quoted and must submit the combined application fee and TNSR fee (along with any other appropriate fee add-on such as those for NSR, source testing, NESHAP and ATCM review) for all emission units. Labor spent performing TNSR, either by the permit engineer or the Toxics section must be coded as billable time in labor tracking.

Submittal of TNSR De minimis Screening HRAs to the Toxics Section - Rule 1200 requires that the District "develop screening risk assessment procedures for common equipment and toxic air contaminants to expedite and standardize review for compliance with Section (d)" and "propose additional exemptions to Section (b) that the Air Pollution Control Officer deems appropriate, based on the results of these screening procedures." In order to do that it is necessary to review data on emission units that pass the District's de minimis screening procedure. Therefore, all de minimis screening HRAs must be submitted to the Toxics Section Aide.

Review of Applicant Prepared Health Risk Assessments - Health Risk Assessments prepared by applicants and submitted with an application should be forwarded, upon receipt, to the Toxics Section for review. Although it may, in some cases, be easier to perform a de minimis screening HRA, refined HRAs submitted by the applicant cannot be ignored. Refined HRAs often result in lower estimated risk than screening analyses which can impact the results of the engineering evaluation. In addition, submittal of these refined HRAs early in the evaluation process will help expedite permit issuance.

5.4 Rule 11(a)(6) Interpretation (Tom Weeks, November, 2010)

Rule 11(a)(6) states that the exemption from permit requirements specified in section (d) "...shall not apply to any new or modified equipment, operation or process which emits or may emit toxic air contaminants, as defined in Rule 1210, and which the Air Pollution control Officer determines has emissions which, in the absence of any emission control device or limitation on material usage or production, may be expected to exceed any standard specified in Rule 1200(d)(1)(i), (d)(2) or (d)(3)."

Engineering Division Manual of Procedures

In the past this has been interpreted to mean that any exempt emission unit that emits a Rule 1200 toxic air contaminant in quantities greater than de minimis amounts, no longer qualifies for an exemption and must obtain a District permit. However, de minimis toxic emission rates are highly health protective and exceeding these levels does not mean that an emission unit will “exceed a standard specified in Rule 1200(d)(1)(i), (d)(2) or (d)(3).”

Therefore, prior to imposing the Rule 11(a)(6) exclusion, a site specific health risk assessment must be performed. Because most exempt equipment emit TACs and do not to present a public health risk, the request to perform a refine HRA should be based on knowledge that the subject equipment differs in some way from the other equipment in the exempt category and may therefore be expected to exceed a standard specified in Rule 1200(d)(1)(i), (d)(2) or (d)(3).

5.5 Procedure for Updating Tables in Rule 1200 and 1210

The following procedure shall be used to update tables in Rules 1200 and 1210.

- 1) Edit the table and include the new revision dates on each table as applicable
- 2) Publish a 30 day notice
- 3) After the comment period ends, an Advisory is mailed to all permit holders and the District’s general mailing list. The advisory should include a brief description of the nature of the changes, who to contact with questions.
- 4) Revised table are distributed as rule book updates.
- 5) Rules with revised tables are posted on the website.

6. Permit to Operate Evaluations

6.1 P/O Engineer Evaluation Requirements and Process (October, 2020, Nick Horres)

The purpose of the PTO evaluation is to explain the results of the initial inspection and how any specific initial compliance requirements were fulfilled. It should also highlight any changes made to the equipment since the A/C, discuss additional rule analysis if necessary due to changes, and explain any changes made to the conditions. Finally, it contains our recommendation for either approving or denying the permit. There is a standard format for the evaluation available as a template which contains the following sections:

7.0 Inspection Report

- This section should include the results of the initial inspection and any discussion about changes to the equipment from the A/C to the proposed PTO. It should be as specific as possible and not simply state that the equipment met the requirements. Typical information that should be noted in the PTO evaluation includes:

Engineering Division Manual of Procedures

- Listing of each piece of equipment inspected and whether it matched the requirements of the A/C or there is a minor change. E.g.:

“The engine matched the A/C description, with a S/N of BC204820485 which was added to the S/A” or
“The installed burner was a slightly different model number, VC300-2 and had a slightly lower heat input, 22 MMBtu/hr compared to 22.5 MMBtu/hr listed in the application.”
- Discussion of each permit condition that was reviewed during the inspection and how compliance was demonstrated. If there was a source test conducted, state that the source test results showed compliance with permit limits (or didn't). E.g.:

“The engine was equipped with an hour meter (with a reading of 6.5 hr) and the operator provided the maintenance manual, maintenance records and engine log book” or
“The baghouse was equipped with a magnahelic gauge; however, the incorrect gauge was installed and the range (1”-2” H₂O) is not sufficient for the range of the filter (1”-6”). A new part had already been ordered, so a requirement was added to the S/A to replace the gauge within 14 days and provide a photo to demonstrate”
- State that there are inspection photos available or explain why there aren't any.
- If the equipment installed deviated from the equipment description in any way that potentially could affect permit requirements, there should be a discussion of how the change continues to comply with the same conditions on the A/C or required reanalysis. Typical reasons you may need to consider changes/rule analysis:
 - The equipment installed is larger than the proposed equipment
 - A different engine is installed that has higher diesel PM emissions
 - A coating process is found to consist of different types of coating than proposed (e.g. proposed as metal coating but during inspection you find aerospace components)
 - Initial material usage is higher than expected and causing exceedance of emission limits
 - Different monitoring equipment is installed than proposed
 - The applicant requests changes to the A/C requirements that could affect emissions
- Explain any changes to permit conditions, potentially including attachments or other aids to more easily show what is changing. A spreadsheet comparing A/C to PTO or listing strikeout/highlight versions of the conditions in the evaluation typically is the best way.

8.0 Recommended PTO Conditions

This section should state the conclusions of the evaluation and either recommend that permit be issued or the application denied. If proposing approval, the CON record should

Engineering Division Manual of Procedures

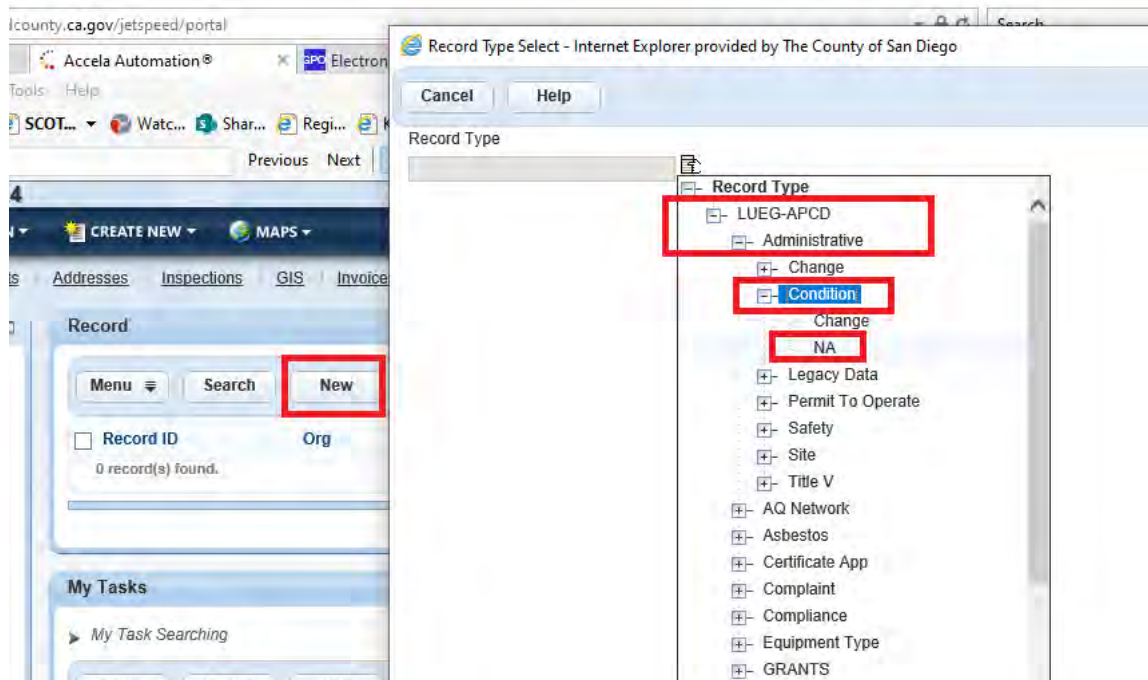
be listed and whether it was new or modified, and whether it deviated from the A/C requirements.

6.2 Creating Conditions for PTOs (October, 2020 Nick Horres)

Conditions for permits will typically be very similar to conditions for the authority to construct. Standard condition sets are maintained in BCMS as “CON” records. If an already approved CON with no changes is being used (e.g. for a standard emergency engine) then you only need to apply the condition set to the permit. If not, a new condition set is prepared or an existing CON is revised.

The first step in preparing the conditions is typically to finalize all the conditions on the application record and then copy them to the PTO. Alternatively, if you do not need to issue an S/A with the final PTO conditions, conditions can be finalized on the new CON record instead. For any new or revised conditions, the engineer should follow through the steps outlined in the A/C evaluation procedures to identify if there is an already approved reference condition that meets the same need, and if revised conditions are present only on the permits affected by the application.

If creating a new CON, the next step is to create the record in BCMS. The following steps show how to create and name the CON. To name the CON, the fee schedule and brief description are listed as the organization name:



Engineering Division Manual of Procedures

New Record By Single - Internet Explorer provided by The County of San Diego

10/06/2020

Detailed Description

[check spelling](#)

Entered by Division [Current Division](#)
APCD Engineering Chem & VR

Entered by Staff * [Current User](#)
Nicholas Horres

Entered Date

Assigned to Division [Current Division](#)
--Select--

Assigned to Staff [Current User](#)
--Select--

Record Name

APCD New Record Form 7.1

APCD Customer (This section is not required.)

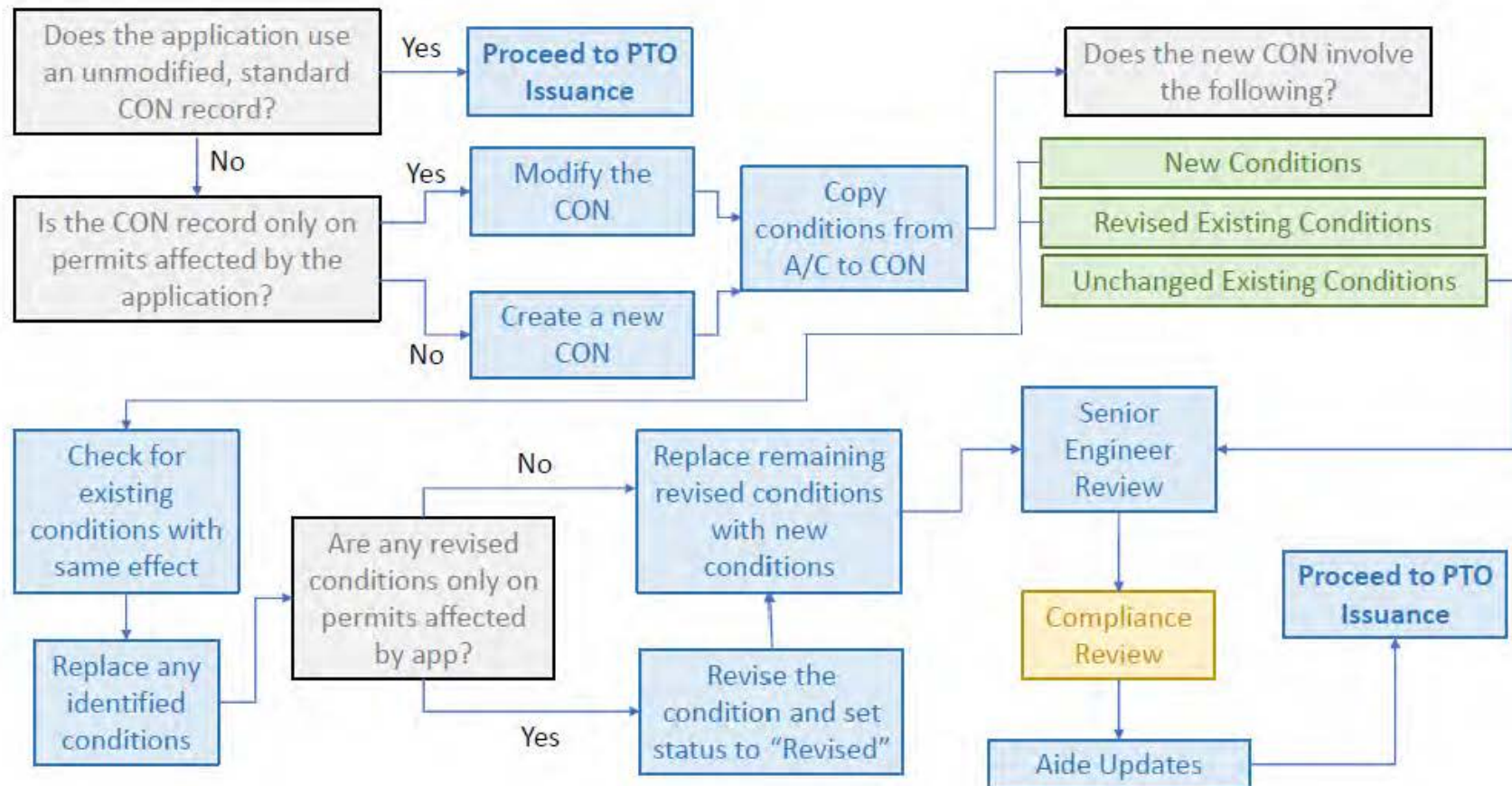
[Search](#) [As Contact](#)

Type *	First Name	Last Name	Full Name	Relationship	Title	Organization Name	Street Address	Business Phone	Address Line 2
APCD Customer				--Select--		27R - Automotive coating, HHHHHH exempt, custom VOC an			

Once the CON record is created, conditions should be copied from the APP record and any updates made. The initial workflow step should then be completed by the permit engineer. The engineer should then notify their senior engineer that it is ready for review and provide any relevant information explaining what changes were made and why. The senior engineer then completes the workflow step and forwards the request to a representative from Compliance for review and approval. Compliance review is primarily focused on enforceability. Compliance will complete their review and the workflow task and forward the request to the engineering aide to finalize the condition setup. Finally, the aide will notify the permit engineer that the set is ready and the permit issuance process can proceed. Review time should be charged to the underlying applications, not to the CON record itself.

The following diagram provides a rough outline of a typical permit condition/CON record setup process.

Condition Management Process



Engineering Division Manual of Procedures

6.3 Permit Condition Language Guidance (October, 2020 Nick Horres)

General Guidance

Writing good permit conditions is one of the most important steps in the application review process. We utilize standard conditions whenever possible, but a high percentage of applications will need new conditions. Engineers should generally consider the following principles when drafting conditions and also follow any directions from their supervisor:

- Utilize existing conditions whenever possible
- Duplicate existing wording only changing the relevant sections. For example: if there is a standard condition for a temperature limit at 700 degrees C and you need a limit of 750 degrees C, copy the existing condition and update the limit rather than attempting to write a new condition.
- Pay close attention to usage of “and”, “or” and comma placement to ensure the condition is enforceable as intended. Something that may be implied when used normally in spoken English can be vague in the context of a permit condition. A common mistake is to use phrasing similar to:

Emissions from this equipment shall be below 10 lb/day or 5 tons/year.

The usage of “or” in the above sentence can be interpreted as saying that the applicant only needs to meet one of the limits rather than both. In this condition the “or” should be replaced with “and”

- Use definitive language. E.g. always specify “the operator shall do A...” not “the operator should do B...”
- Be clear and concise. It’s better to have more, simpler conditions than fewer longer conditions.
- Utilize “permit streamlining” principles (if one rule requires meeting an emission limit of 10 ppm and one requires meeting 15 ppm, you can combine them and list an emission limit of 10 ppm)
- There must be a mechanism (typically a test or monitoring requirement) to demonstrate compliance with any condition on the permit
- Many limits will also require recordkeeping conditions requiring the owner/operator to maintain documentation to show they comply with all limits/requirements (maintenance records, material usage records, etc.)
- Include rule references in the condition. The ideal form of rule references is to place brackets around them but parentheses are also acceptable. You may also cite multiple rules in one condition so that the condition can be used on a greater variety of permits. For example: All fuel used in this engine must be CARB diesel. [Rule 69.4.1 and/or 17 CCR 93115 and/or 17 CCR 93116]
- Avoid employing complex calculations within conditions unless absolutely necessary
- Pollutant and chemical names should be used, spelled correctly and for TAC limits include the CAS #

Engineering Division Manual of Procedures

- Be specific whenever possible. The vaguer a condition is, the more likely that the facility will eventually misunderstand it and it will be harder for Compliance to enforce the requirement.
- When stating things like calculation methodologies, test procedures or similar requirements that are not specified in the regulation, consider including phrasing similar to "...or alternative procedure approved in writing in advance by the District"
- Do not refer to other conditions by number or as "below" or "above" since conditions can easily be reordered/renumbered
- Consider who the operator/permittee is. Larger, more sophisticated companies with dedicated environmental staff and past experience working with permits will have an easier time complying with more complex requirements than a small operation new to permitting

6.4 Preparing a PTO in BCMS

The last step in finishing a PTO evaluation is to prepare the PTO in BCMS. Depending on the application type, this may require modifying an existing permit, relocating an existing permit, or creating a new permit. When possible, modifying/relocating an existing permit should be utilized instead of creating a new permit.

Modifying an existing permit

The two parts of a permit that need to be modified when finishing an application are the permit record and the conditions.

In the permit record, the equipment description, equipment types, BEC and version history need to be revised. For the version history, the PTE and expected actual emission values must be completed for any application that involved emission calculations.

NOTE: It is extremely critical that the PTE and expected actual emissions are completed accurately on any permit when the application involved emission calculations or emission calculations are readily available from previous applications. These will be utilized as data made available to the public through AB423 changes, so accuracy and completeness is key.

Engineering Division Manual of Procedures

APCD2020-PTO-003445 - Caterpillar Model: C175-20 DM 8854

Save

Reset

Help

Go To

Summary

Record

- Permit to Operate

Activities (0)

Activity Summary (1)

Address (0)

Ac

Permit Description

Emergency Diesel Engine Generator: Caterpillar Model C175-20 DM8854-02, S/N BXR01999; Engine Family JCPXL106.NZS; tier 2 certified; 5646 bhp rated; turbocharged with air cooler; driving a 4 MW emergency electrical generator

The permit/equipment description should be input here

[check spelling](#)

BEC

APCD2015-CON-000928

Type - [Portable/Stationary]

Stationary

Legacy Data

Legacy Reference ID

Legacy BEC

Inspection Frequency

Annual

Throughput

Unit of Measure

P/V Valve manufacturer

--Select--

Capacity

5646

Unit of Measure 2

bhp

Field N

Enter the BEC and throughput or capacity data, also whether equipment is portable or stationary

Fill in these fields to ensure that correct renewal fees are collected each year. You can also add multiple types of fee schedule.

EQUIPMENT TYPES

Add

Delete

CSV

CSV Export

☐ Number of Units(Number)

1

Equipment Type *

[34H] California Certified Emergency Standby Engine

Assess on Renewal *

☒ Yes ☐ No

Enter PTE and expected actual emissions for each pollutant

VERSION HISTORY

Add

Delete

CSV

CSV Export

Each time the application is approved, create a new version history and fill in these fields

☐ Version Number(Number) *

1

Revision Date *

02/24/2020

Application(Text)

APCD2016-APP-004747

Site(Text)

APCD1976-SITE-00243

Reason

Initial

Notes(Text)

PTE NOx (#)

54.6

The equipment type section is what determines annual renewal fees. Some fee schedules are based on each emission unit while some are based on each facility, so these should be set correctly as listed in Rule 40. In some cases, such as rock plants, there may be multiple fee schedules on the same permit that are set to assess renewal. For coating permits that involve multiple types of coating, each fee schedule should be added, but only the highest renewal fee should be set to assess.

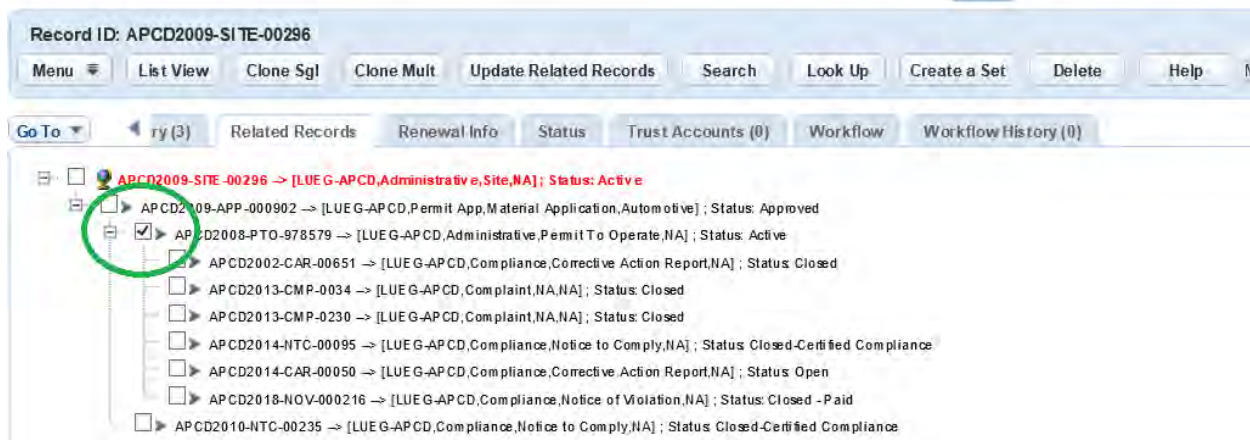
The last step is to apply the conditions from the approved CON by copying to the permit as shown in other procedures.

Relocating a permit

Before submitting the final evaluation for approval, the existing permit needs to be moved to the new site ID. This can be accomplished as follows. This covers only those additional steps for changing a permit's location. All other steps should be followed as usually for BCMS and completing the PTO evaluation. Permit Engineers can carry these steps out themselves or request an aide to move the permit.

Engineering Division Manual of Procedures

1. Open the old site record that is associated with the permit to be moved in “related records”. Find the permit in question and check the box next to it.



2. Click “Delete” from the menu. Note that this does not delete the permit, it deletes the association to the old SITE.



After clicking the button, the old site will now no longer be connected to the permit.



3. Open the change of location application in the “related records” tab. Select the “look up” function.

Engineering Division Manual of Procedures

Record ID: APCD2019-APP-006078

Menu List View Clone Sgl Clone Mult Update Related Records Search Look Up Create a Set Delete Help

Go To (2) Related Records Renewal Info Status Trust Accounts (16) Workflow Workflow History (6)

APCD2019-SITE-03207 → [LUE G-APCD, Administrative, Site, NA] ; Status: Active

APCD2019-APP-006078 → [LUE G-APCD, Permit App, Material Application, Automotive] ; Status: Open

Search for the permit that is being relocated.

Record ID: APCD2019-APP-006078

Submit Reset Cancel Help Enable Soundex Search

Go To (2) Related Records Renewal Info Status Trust Accounts (16) Workflow Workflow History (6)

Record ID [Alt + R] % is wildcard
%PTO-978579

Opened Date:
From: To: 11/19/2019

Status [Alt + S]
--Select--

Record Type
Group Type Subtype Category
LUEG-APCD --Select-- --Select-- --Select--

After clicking submit and finding the permit, check the box next to the application and click “select as child”. Since you are on the application record, this selects the permit as being under it, following the typical record relationships.

Record ID: APCD2019-APP-006078

Menu Select as Parent Select as Child Search Cancel Help

Go To (2) Related Records Renewal Info Status Trust Accounts (16) Workflow Workflow History (6)

Record ID	Brief Description	Type	Sub Type
<input checked="" type="checkbox"/> APCD2008-PTO-978579		LUEG-APCD/Administrative	Permit To Operate/NA

After this, a window will pop up asking what parameters should be copied. Select only “Contact” and click submit. This copies the application contact information, including equipment location, to the permit.

Engineering Division Manual of Procedures

Submit Reset Cancel Help

Record Specific Information

- ☐ Fee Items ([Select](#))
- ☐ Workflow Status
- ☐ Inspection ([Select](#))
- ☐ Record Specific Info ([Select](#))
- ☐ Additional Info
- ☐ Valuation Calc.
- ☐ Workflow Task Specific Information
- ☐ Status or New Status: --Select--
- ☐ Status History

General Record Information

- ☐ Record Details ([Set Application Description](#))
- ☐ Parcel
- ☐ Parcel Owner
- ☐ Address
- ☐ Assets
- ☐ Licensed Professionals ([Select](#))
- ☒ **Contact ([Select](#))**
- ☐ Document
- ☐ Preserve Dates

This should successfully move the permit to the new site and place it under the application.

Record ID: APCD2019-APP-006078

Menu List View Clone Sgl Clone Mult Update Related Records Search Look Up Create

Go To (2) Related Records Renewal Info Status Trust Accounts (16) Workflow Workf

1 record(s) added successfully.

- APCD2019-SITE-03207 → [LUE G-APCD, Administrative, Site, NA] ; Status: Active
- APCD2019-APP-006078 → [LUE G-APCD, Permit App, Material Application, Automotive]; Status: Open**
- APCD2008-PTO-978579 → [LUE G-APCD, Administrative, Permit To Operate, NA] ; Status: Active
- APCD2002-CAR-00651 → [LUE G-APCD, Compliance, Corrective Action Report, NA] ; Status: Closed
- APCD2013-CMP-0034 → [LUE G-APCD, Complaint, NA, NA] ; Status: Closed
- APCD2013-CMP-0230 → [LUE G-APCD, Complaint, NA, NA] ; Status: Closed
- APCD2014-NTC-00095 → [LUE G-APCD, Compliance, Notice to Comply, NA] ; Status: Closed-Certified Compliance
- APCD2014-CAR-00050 → [LUE G-APCD, Compliance, Corrective Action Report, NA] ; Status: Open
- APCD2018-NOV-000216 → [LUE G-APCD, Compliance, Notice of Violation, NA] ; Status: Closed - Paid

- Now the data just needs to be cleaned up. First open the permit and delete the old contacts. There should only be one of each contact type. Note that the new equipment location must be changed to the primary contact to allow deleting the old equipment location.

Record ID: APCD2008-PTO-978579

Menu Message Contacts View Log Help

Go To New Record - Permit to Operate Activities (0) Activity Summary (15) Address (1) Addtl Info Calendar Classic Reports Commen

Deactivate

- ☐ Contact Sync from Reference
- ☐ 6474874 Sync to Reference
- ☐ 6023210 Stop Sync
- ☐ 6474874 Remove
- ☐ 6474874 APCD Equipment Owner
- ☐ 60232105 APCD Invoice Mailing
- ☐ 64748746 APCD Invoice Mailing
- ☒ 60232104 APCD PTO Mailing
- ☐ 64748745 APCD PTO Mailing

First Name	Last Name	Org Name	Address Line 1	Address Line 2	City
Zarina	Gonzalez	International Trailer S...	1421 N Wanda Rd #140		Orange
Doug	Dickey	International Trailer S...	2001 Enrico Fermi Dr #D		San Diego
		International Trailer S...	9170 Siempre Viva Road		San Diego
		International Trailer S...	1421 N Wanda Rd #140		Orange
Barry	Denes	International Trailer S...	1421 N Wanda Rd #140		Orange
		International Trailer S...	1421 N Wanda Rd #140		Orange
Barry	Denes	International Trailer S...	1421 N Wanda Rd #140		Orange
		International Trailer S...	1421 N Wanda Rd #140		Orange

Engineering Division Manual of Procedures

Record ID: APCD2008-PTO-978579

Save Reset Cancel Help

Go To Summary Record Permit to Operate Activities (0) Activity Summary (15) Address (1) Addtl

Type [Required] * First Name Last Name Full Name
APCD Equipment Location ▼ Zarina Gonzalez Zarina Gonzalez

Relationship Title
--Select-- ▼

Primary
No ▼

Organization Name
International Trailer Services Inc

Street Address
2001 Enrico Fermi Dr #D

Address Line 2

Address Line 3

City State Zip Code Country
San Diego CA 92154 --Select-- ▼

E-mail

Business Phone
619-661-5394

Mobile Phone

Home Phone

Fax
619-661-5396

After cleanup, there should only be one of each contact type.

Record ID: APCD2008-PTO-978579

Menu Manage Contacts View Log Help

Go To Summary Record Permit to Operate Activities (0) Activity Summary (15) Address (1) Addtl Info Calen

2 record(s) deleted successfully.

Contact ID	Type	First Name	Last Name	Org Name	Address Line 1
64748742	APCD ATC Mailing			International Trailer S...	1421 N Wanda Rd #140
64748744	APCD Equipment Location	Doug	Dickey	International Trailer S...	9170 Siempre Viva Road
64748743	APCD Equipment Owner			International Trailer S...	1421 N Wanda Rd #140
64748746	APCD Invoice Mailing			International Trailer S...	1421 N Wanda Rd #140
64748745	APCD PTO Mailing	Barry	Denes	International Trailer S...	1421 N Wanda Rd #140

5. After moving the permit, this has left the original application record by itself. To prevent loss of documents in accordance with the retention schedule, the original application should also be moved and associated with the permit.

Finally, the PTO record data and permit conditions should be updated as necessary following the same steps as for a modified permit.

Creating a new permit

To create a new permit, the application record will be “cloned” to copy key information over. This is done from the related records tab in BCMS

Engineering Division Manual of Procedures

APCD2018-APP-005644 Use the Clone Mult function from the application

Menu List View Clone Sgl **Clone Mult** Update Related Records Search Look Up

Go To Related Records Renewal Info Status Trust Accounts (0) Workflow Wor

APCD1997-SITE-09883 --> [LUEG-APCD,Administrative,Site,NA] ; Status: Active

APCD2018-APP-005644 --> [LUEG-APCD,Permit App,Vapor Recovery,EVR Phase II OTC] ; Status: Approved

Now set the record type to PTO and create the new record. When prompted, select to copy contact information and then submit to create the new PTO record.

APCD2018-APP-005644 Lastly, press submit

Submit New Set Existing Set Cancel Help

Go To Related Records Renewal Info Status Trust Accounts (0) Workflow Workflow History (10)

of Clones per Record Type 1 Clone To Set: Clear

Please select the Record Type

Record Type

- LUEG-APCD
 - Administrative
 - Change
 - Condition
 - Legacy Data
 - Permit To Operate
 - NA**
 - Safety
 - Site
 - Title V
 - AQ Network

Press the arrow to move the type over

Set the record type tree to Permit To Operate/NA as shown

Please select the Record Type

LUEG-APCD/Administrative/Permit To Operate/NA

Submit Reset Cancel Help

Record Specific Information

- ☐ Fee Items [\(Select\)](#)
- ☐ Workflow Status
- ☐ Inspection [\(Select\)](#)
- ☐ Record Specific Info [\(Select\)](#)
- ☐ Additional Info
- ☐ Valuation Calc
- ☐ Workflow Task Specific Information
- ☐ Status or New Status: --Select--
- ☐ Status History

General Record Information

- ☐ Record Details [\(Set Application Description\)](#)
- ☐ Parcel
- ☐ Parcel Owner
- ☐ Address
- ☐ Assets
- ☐ Licensed Professionals [\(Select\)](#)
- ☒ **Contact [\(Select\)](#)**
- ☐ Document
- ☐ Preserve Dates

Engineering Division Manual of Procedures

APCD2018-APP-005644

Menu List View Clone Sgl Clone Mult Update Related Records Search Look Up Cr

Go To Related Records Renewal Info Status Trust Accounts (0) Workflow Workfl

1 record(s) added successfully.

+	APCD1997-SITE-09883 --> [LUEG-APCD,Administrative,Site,NA] ; Status: Active
-	APCD2018-APP-005644 --> [LUEG-APCD,Permit App,Vapor Recovery,EVR Phase II OTC] ; Status: Approved
+	APCD2020-PTO-003462 --> [LUEG-APCD,Administrative,Permit To Operate,NA] ; Status: Unapproved

Now that the new permit is created, the same steps should be followed as for modifications to create the record data and apply the conditions.

6.5 Permit Streamlining (October, 2020)

It is important that engineers finalize permit evaluations as soon as possible after compliance with permit conditions has been established. Startup Authorizations are typically issued for 6 months, and ideally the final permit should be issued before the startup authorization expires. Additionally, applications for new equipment only include renewal fees for one year of operation, and extending the startup authorization period beyond one year can result in an applicant having to pay fees before their permit becomes active.

6.6 Denials (November 2021)

Before an application for an A/C is denied, the applicant generally will be notified by telephone of the proposed action with the reasons and the call will be documented. The applicant will be given an opportunity to submit any revised or new information in order to demonstrate that the application should not be denied. This must be done through the submittal of a new application and a fee that will be determined in accordance with Rule 40(a)(4). If such a demonstration is not made as soon as is reasonably possible (within 10 working days), the denial action will be taken. Proposed P/O denials will be reviewed with the supervisor. If there is a benefit in notifying the applicant of the proposed action before it is taken, it will be done in a manner similar to that for an A/C denial. All A/C or P/O denial actions (except routine, off-the-shelf equipment) will be approved by the chief of engineering and the deputy director. The section's senior engineer will sign all denial letters. The section's senior engineer will sign all denial letters.

Operation of equipment without written authorization is a misdemeanor subject to fines or penalties up to \$10,000 a day. If the withdrawal of an S/A or denial of an application is due to an emission violation and operation of the equipment continues, an additional penalty of up to \$75,000 a day may be assessed

When denying or canceling an application, the applicant will be advised that if there is construction without an A/C, Rule 10(a) will be violated or if there is operation without a P/O, Rule 10(b) will be violated. Notice that a violation of any District rule or regulation will be subject to civil and criminal penalties also will be stated. Similar language will be used when there may be the potential to violate other District rules.

Engineering Division Manual of Procedures

The following letter template, or an equivalent as approved by the Senior Engineer, shall be used for all denials.

Month DD, YYYY

Applicant Name

Applicant DBA

Applicant Title

Address

City, CA, ZIP

APPLICATION
NO.: APCD20XX-APP-
XXXXXX

Dear _____,

This is in reference to the permit application filed by [Applicant DBA] with the San Diego County Air Pollution Control District (District) for an Authority to Construct (ATC) [Project Description] to be located at [Equipment Location Address]. After a detailed review, the District has concluded the proposed project as specified in Application No. APCD20XX-APP-XXXXXX, will not comply with applicable District rules (and/or state and/or federal air quality laws & regulations). Specifically, the proposed equipment will not comply with District Rule [...list all District, state and federal rules, laws or regulations requirements not met].

Therefore, in accordance with District Rule 22 - Denial of Applications, this application for an Authority to Construct and Permit to Operate is hereby denied.

Please note that [Applicant DBA] may appeal this denial through the filing of a petition with the District Hearing Board for a public hearing. Such a petition must be made within 30 days after receipt of this letter. [Applicant DBA] may also submit another application to the District for an Authority to Construct and Permit to Operate for equipment which will comply with applicable District rules (and all applicable state and federal laws and regulations).

Construction or operation of equipment without written authorization from the District is a misdemeanor subject to fines or penalties as specified in California Health and Safety Code.

If you have any questions regarding this action, please contact [District Project Engineer] at (858) XXX-XXXX, [District Project Engineer e-mail address] or the undersigned at (Tel. No. & email address).

Senior Engineer Name

Senior Engineer Title

Engineering Division Manual of Procedures

6.7 Review of Conditions by Applicants (October 2020)

Before issuing a PTO, we must ensure that the applicant/operator understands the conditions and can comply with them. Conditions should initially be reviewed with the operator before the S/A is issued. If any changes are necessary, the Engineer should provide the applicant the opportunity to review and comment on the proposal. Typically this can be done by issuing an S/A with the updated conditions prior to beginning work on the CON approval or once reviewed by Compliance.

The engineer should consult with their supervisor to determine when conditions should be provided to the applicant. For minor changes or changes that are expected to be approved by the senior engineer and Compliance, the conditions may be provided concurrently with CON review. If there is uncertainty, conditions should typically be approved by Compliance prior to providing to the applicant unless they are made aware that changes are likely.

6.8 Applications Required for Expired Permits (April 24, 1979)

Rule 10(h) requires an application for an annual renewal permit prior to the expiration date of the current permit. If no such application is made, the permit is expired.

In order to provide some flexibility to handle late applications for renewal in a reasonable manner, Rule 10(h) provides a six-month period within which an expired permit can be reinstated as though it were an annual renewal, provided an application for renewal is made and all fees and penalties are paid. Submittal date is the postmarked date, if the application is mailed.

Once the six-month period has passed, the permit is expired, and all current rules and regulations of the District apply. Therefore, a new application for an A/C and P/O will be required.

6.9 Documents to be upload prior to submitting the PTO for approval

In addition to the documents required to be uploaded during the A/C review and issuance process, the following documents are expected to be uploaded as they become available/finalized during PTO evaluation, prior to submitting the application for final approval:

- Signed CCN returned by applicant
- Inspection Report/PTO Evaluation
- Startup Authorization
- Inspection Photos
- Source Test Report
- Supplemental test data or other information required as part of satisfying a condition

Engineering Division Manual of Procedures

- Any relevant correspondence with applicant or other regulatory agencies
- Invoices sent for additional fee deposits

7. Startup Authorization (S/A)

7.1 S/A Issuance (February 22, 1984)

- A. When a P/O evaluation that clearly demonstrates that the subject operation is in compliance with District requirements is done, an S/A will be issued allowing operation until a P/O is issued. This type of S/A will be issued for six months.
- B. When equipment has been installed in accordance with an A/C or installed properly if an A/C is to be issued concurrently with a P/O and appears to be operating properly with no apparent violation of a District requirement, but will require further evaluation (i.e. source testing), an S/A may be issued for shakedown and test. The S/A will be issued for no longer than is reasonable to conduct the shakedown/testing and for the District to verify compliance. S/As of this type will not be issued for longer than 30 days without specific approval from the senior engineer. The senior engineer will approve extension of this type of S/A.
- C. When the initial P/O evaluation indicates that operation of the subject equipment does not meet District standards but the problem may be corrected readily, an S/A will be issued for shakedown and test. A senior engineer will approve S/As of this type in advance. They will be of limited duration (i.e 10 days) and will specify as a condition of the S/A, what corrective action must be taken. When liquid leaks are found, an S/A will be issued consistent with this type of policy only if a condition is added to the S/A that requires such leaks to be corrected within one working day from the issuance of the S/A.
- D. In the event a P/O evaluation indicates that operation of the subject equipment does not meet District requirements and substantial rework or replacement would be required for compliance to be achieved, the matter will be discussed with the supervisor regarding possible denial, S/A issuance or notification that a variance is needed to continue operation. The supervisor or deputy director will provide guidance.
- E. Only the vapor control staff will issue Notices to Repair.
- F. For portable, off-the-shelf equipment, such as tar kettles and abrasive blast pots that will not exceed any NSR rule thresholds and that are not subject to any emission limitation other than Rule 50, the applicant will be advised that upon receipt of the application, he must notify the District the first time the equipment will be used in the county and that failure to do so will result in a violation of District rules. When

Engineering Division Manual of Procedures

the District is so notified and either an engineer or an inspector observes the source in operation, an S/A can be issued to cover the approximately 60-day P/O issuance turnover time. For those cases where an inspector will issue the S/A, the District will provide the Compliance division with the appropriate conditions that must be included with the S/A. (December 19, 1979)

- G. The S/A date cannot be changed once it has been entered on the VAX. The present coding of the screen has been set up so that once the data has been entered and saved (committed) users cannot modify it. This information can be modified by Data Management. (March 10, 1994)

7.2 Implementation Procedures for Rule 24 (July 1, 1997)

On March 20, 1996, the Board repealed old Rule 24 and adopted a new Rule 24 entitled **Temporary Permit to Operate**. With the repeal of old Rule 24, applicants can no longer deem their permit applications denied if not acted upon within 90 days and can no longer appeal that presumptive denial to the Hearing Board.

New Rule 24 contains provisions that allow new, modified and existing equipment to temporarily operate, under specified circumstances, without a Startup Authorization or Permit to Operate or Hearing Board variance. You should already have a copy of new Rule 24 in your Rules and Regulations.

In the past, businesses could not operate their emission units without written District authorization. This meant that new or modified emission units with an A/C could not operate until Engineering conducted an inspection and issued a S/A. It also meant that new (or modified) units built without an A/C could not legally operate until their applications were evaluated, an A/C was issued, and an inspection done and an S/A issued. A facility's only recourse to obtain operating authority pending issuance of a S/A was to petition the Hearing Board for a variance. This was time consuming and costly.

In 1996, the District decided to write a new Rule 24 to streamline this process. In general, Rule 24 allows the A/C to serve as a temporary permit to operate new or modified emission units, and a substantially complete application to serve as a temporary permit to operate existing emission units installed without the required A/C. Compliance action is still applicable to equipment installed without an A/C and operation must still be in compliance with all applicable District rules.

Rule 24 does not significantly change current Engineering procedures for evaluating and issuing Authorities to Construct, Startup Authorizations or Permits to Operate. However, it does require change in two areas:

- A. Authorities to Construct for new or modified emission units must contain provisions that implement a temporary permit to operate once construction is complete and the applicant provides the required notice to the District.

Engineering Division Manual of Procedures

- B. This procedure describes the process for the applicant to notify the District that construction is complete in accordance with the A/C, for the District to document this for the file, and for the Compliance Division to access information on the status.

There may also be occasions when the Compliance Division will inquire if an application submitted for a previously permitted or existing, unpermitted emission unit is substantially complete and the project engineer will need to respond. Guidance on whether an application will be considered substantially complete is provided later in this memo.

When a facility operating under a Rule 24 temporary permit to operate is determined by the District to not be in compliance, the temporary permit to operate can be withdrawn. The procedures for withdrawing a temporary permit are also discussed later in this memo.

Note: Rule 24 is not intended to provide a temporary Title V permit to operate. Title V sources that operate new or modified emission units pursuant to authorizations under Rule 24 are in compliance with District Rule 10 permit requirements, but are obligated to ensure they have also met the requirements of District Regulation XIV which prescribes the Title V permit program in San Diego.

Procedures

The temporary permits to operate provided by Rule 24 are not to be a basis for delays in permit application processing. The requirements of Rule 18 still apply, as do all policies, procedures and customer expectations for timely actions on applications.

- A. Rule 24, Sections (a) and (b) - New and Modified Emission Units:

The Authority to Construct for new or modified emission units will serve as a temporary Permit to Operate once the owner/operator provides written notification that construction is complete in accordance with the Authority to Construct. Note that Rule 24(a) defines a new emission unit as one not previously authorized by the District to operate in the county and for which a currently valid A/C has been (or is being) issued.

For purposes of Rule 24, a relocated or replacement emission unit will be considered a modified emission unit and the procedures described below apply. However, an emission unit that has been relocated without an Authority to Construct but for which a substantially complete application has been submitted could be operated under the provisions of Rule 24, Section (d) as an existing emission unit.

- B. To implement Rule 24, Sections (a) and (b):

Engineering Division Manual of Procedures

- 1) When issuing an Authority to Construct for a new or modified emission unit, include the following as the last condition of the Authority to Construct:

"This Authority to Construct authorizes temporary operation of the above specified equipment. This temporary permit to operate shall take effect upon written notification to the District that construction (*or modification*) has been completed in accordance with this Authority to Construct. This temporary permit to operate will remain in effect, unless withdrawn or modified by the District, until the equipment is inspected by the District and a revised temporary permit (Startup Authorization) is issued or a Permit to Operate is granted or denied."

"Upon completion of construction (*or modification*) in accordance with this Authority to Construct and prior to commencing operation, the applicant must complete and mail, deliver or fax the enclosed Construction Completion Notice to the District. After mailing, delivering or faxing the Notice, the applicant may commence operation of the equipment-. Operation must be in compliance with all of the conditions of this Authority to Construct and applicable District rules."

"This Authority to Construct shall be posted on or within 25 feet of the above described equipment, ' or maintained readily available at all times on the operating premises."

- 2) Delete the language in the Authority to Construct that states that the A/C is not a permit to operate and that operation without District authorization or Hearing Board variance is a violation.
- 3) Include in the Authority to Construct conditions regarding operation of the emission unit as necessary to ensure compliance. Under current permitting procedures, A/C's should already contain anticipated P/O conditions. This procedure must be diligently followed. This does not preclude revising conditions for the S/A or P/O, as needed, to ensure compliance and with the knowledge of the applicant.
- 4) Word Processing will include a stamped, self-addressed Construction Completion Notice with each Authority to Construct letter and with letters to extend Authorities to Construct. A copy of the Notice form is attached. Word Processing will fill in the following information on the Notice, before mailing, based on information from the application and Authority to Construct:

Company Name (DBA)
Application Number
Equipment Address
Type of Equipment
Project Engineer Name/Phone Number

Engineering Division Manual of Procedures

- 5) The applicant must notify the District of construction, installation or modification of the emission unit(s) by mailing, faxing or delivery of the completed Notice. If the applicant calls to notify you, make a note in the file but advise the applicant to complete and mail/fax/deliver the Construction Completion Notice.
- 6) The date of District receipt of all Construction Completion Notices will be time-stamped by Clerical on the Notice. Permit Processing will enter the "Construction Completion Date" and "Construction Notification Date" in the corresponding fields in the application file on the VAX, using the information provided on the Construction Completion Notice. Permit Processing will then forward the Notice to the appropriate project engineer. Compliance will use this VAX information to verify that Notices have been received.

If an engineer receives a notice directly, a copy should be forwarded to Permit Processing for recording.

Note: The current "Equipment Installed Date" field in the VAX application file is being deleted in favor of the "Construction Completion Date" field. Also, the Construction Completion Date input by Permit Processing cannot be changed except by a senior engineer.

- 7) On receiving the Construction Completion Notice, the project engineer will contact the applicant to inform them that the Notice was received, verify construction completion and schedule an inspection. This contact should generally be made within one working day, but not later than one week, of receiving the Notice. The project engineer will add the Notice to the application evaluation file.
- 8) The current policies and procedures regarding inspections, Startup Authorizations and permit to operate evaluations/actions will continue to be followed.
- 9) After inspecting the equipment and determining whether it has been constructed/installed/modified in accordance with the A/C and in compliance with applicable District rules, the project engineer must determine whether to issue a Startup Authorization and also update the application file in the VAX system. The date when the project engineer issues the initial startup authorization should be entered by the project engineer in the "S/A Issued Date" field. The "S/A Action Code" field should be completed with the appropriate code depending on whether the S/A is for shake down and testing or operation until a permit can be issued.
- 10) If the Authority to Construct will expire after notice is received that construction is complete, but before an inspection can occur and a S/A issued,

Engineering Division Manual of Procedures

the project engineer should extend the Authority to Construct (not beyond the 5 years from original issuance allowed by Rule 17) by reissuing the A/C or by a letter extending the A/C with the same terms and conditions. Make sure that Compliance receives a copy of the reissued A/C or letter extending the A/C.

- 11) If the project engineer finds that the emission unit is not constructed in accordance with Authority to Construct, or is not in compliance with a District rule, because of minor, easily correctable deficiencies (e.g. missing label, pressure tap or temperature gauge), but can reasonably be expected to operate in compliance with the substantive requirements of applicable rules, the project engineer should issue a Startup Authorization for shake down and testing for a reasonable period of time with conditions requiring the minor deficiencies be corrected by specific dates.

(Note: This procedure is what the language in Rule 24, Sections (a) and (b) is referring to when it talks about the APCO granting a reasonable period of time for the construction to be completed in accordance with the A/C before acting on the P/O. This is not a new procedure. Refer to the attached copies of permit policy memos dated February 22, 1984 and March 29, 1993.)

- 12) If the permit engineer finds that the equipment was not built in accordance with the Authority to Construct, has major deficiencies, and/or is unlikely to be able to operate in compliance with the Authority to Construct or applicable District rules, the engineer should consult with their senior engineer and inform the applicant verbally and in writing of the non-compliance. At that time the engineer is to also advise the applicant that the temporary permit to operate contained in the Authority to Construct is being withdrawn effective 10 calendar days after the date of written District notice.

The written notice to the applicant must cite the reasons why the temporary permit is being withdrawn and advise the applicant that continued operation of the emission unit without written District authorization or a Hearing Board variance will be in violation of District Rule 10(b). When withdrawal of a temporary permit is necessary, the project engineer will discuss with the senior engineer and Chief of Engineering the appropriate disposition of the pending application.

The engineer must also advise the Compliance Division if the noncompliance. The Compliance Division will determine if any follow-up Compliance action is appropriate.

C. Rule 24, Section (c) – Previously Permitted Emission Units

The provisions of Rule 24, Section (c) primarily affect emission units that had valid permits but the permit has expired or has been retired. Section (c) allows the application for permit to serve as the temporary Permit to Operate if the application

Engineering Division Manual of Procedures

is substantially complete. Operation must be in compliance with the previous permit description and conditions, and applicable District rules.

Section (c) only applies to emission units that are not portable (per Rule 20.1 definition), that have not changed ownership, have not been relocated to another stationary source, and have not been altered or modified since holding the previous permit. In these latter cases, Sections (b) or (d) of Rule 24 may apply depending on whether the emission unit is being relocated or otherwise modified, whether an A/C has been or is being granted, and whether the unit is portable. If the emission unit is proposed to be (or has been) altered, modified, or relocated, an Authority to Construct is required and NSR, Rule 1200 and AB3205 may be applicable. In these cases, the implementation procedures described above for Rule 24 Sections (a) and (b) would apply.

Section (c) also only applies if the application for permit is received within 18 months of when the previous permit expired. Since expired permits can be administratively renewed or reinstated (by Permit Processing) within 12 months of expiring (or within 6 months of being retired), Rule 24(c) will generally only have relevance for Engineering when an application to reissue a permit is filed between 12 and 18 months after the previous permit has expired (or between 6 and 18 months after a previous permit was retired). These types of permit applications are infrequent.

The following procedures regarding Rule 24(c) will apply for Engineering:

- 1) If the emission unit has not been altered, modified or relocated (to another stationary source or contrary to a permit condition) since the previous permit, an Authority to Construct is not required, and NSR and the AB3205 notification process do not apply.

The permit evaluation would consist of determining whether the application is substantially complete and whether the emission unit is in compliance with its former permit and with currently applicable District rules. This will typically be based on an inspection, review of the previous evaluation, permit description and conditions, and an evaluation of compliance with current applicable rules.

- 2) For purposes of Rule-24, an application will be considered substantially complete if:
 - the general application form has been completed and signed,
 - appropriate initial fees have been submitted,
 - the application is accompanied by complete supplemental forms, as applicable, and

Engineering Division Manual of Procedures

- all information specifically identified by the District, in writing or on the application or supplemental forms, prior to the filing of the application has been provided.

This does not preclude an application from being determined incomplete for purposes of Rule 18. However, if within 30 days of receipt of an application the permit engineer does not inform the applicant in writing that an application is incomplete, it is automatically deemed complete for purposes of Rule 18, and would be considered substantially complete for purposes of Rule 24.

- 3) If a substantially complete application has been submitted, that application serves as a temporary permit to operate until the unit is inspected and a revised temporary permit to operate (S/A) is issued, or the Permit to Operate is granted to denied.
- 4) The current policies and procedures regarding inspections, Startup Authorizations and permit to operate evaluations/actions will continue to be followed.
- 5) If during the course of the evaluation, the project engineer determines that the emission unit is not operating in compliance with any applicable District rules and regulations, the engineer should consult with their senior engineer, inform the applicant verbally of the noncompliance, and advise the Compliance Division of the noncompliance. The Compliance Division will determine if the temporary permit to operate will be withdrawn and provide written notice of that determination to the applicant.

The project engineer must also advise the applicant, in writing, of the reasons why the equipment is not in compliance and what the applicant must do to bring the equipment into compliance. The project engineer should check with Compliance as to their decision on the temporary permit. If the Compliance Division has determined that the temporary permit to operate provided under Rule 24(c) should be withdrawn, the notice of that determination should be coordinated with the project engineer's correspondence regarding noncompliance and required remedial action(s).

When withdrawal of a temporary permit (or Startup Authorization) is necessary, the project engineer is to discuss with the senior engineer and Chief of Engineering the appropriate disposition of the pending application.

D. Rule 24, Section (d) Existing Emission Units.

Rule 24, Section (d) provides that a substantially complete application can serve as a temporary permit to operate for an existing emission unit that has been constructed, erected or installed without a currently valid Authority to Construct.

Engineering Division Manual of Procedures

This section is intended to reduce the need for applicants to obtain a Hearing Board variance while they wait for an Authority to Construct and a Startup Authorization to be issued.

A facility might construct or install an emission unit without an A/C (in violation of District Rule 10), but then operate it under Rule 24, Section (d) by submitting a substantially complete permit application. However, Section (d) does not grant the facility any immunity from Compliance of the violation of Rule 10(a), i.e. constructing, erecting or installing the emission unit without an A/C, nor immunity from having to comply with District rules.

Section (d) does not apply to applications for portable emission units, nor to emission units subject to the AB3205 notification program, nor to projects that would constitute new or modified major stationary sources as defined in Rule 20.1. (Note: This does not mean that Rule 24(d) does not apply to all emission units at major stationary sources. Instead, Rule 24(d) excludes only those emission units or projects whose emission increases constitute a new major source or a major modification of an existing major source.) Emission units must be operated in compliance with all applicable District rules.

Section (d) should not significantly impact Engineering's permit processing procedures. Engineers should be familiar with Section (d) so they can answer applicant questions regarding it. Also, Compliance Division staff may periodically ask if an application received is substantially complete. In such case, the criteria described above in Section (c) and repeated below apply. If those criteria have been met, the application is considered substantially complete for purposes of Rule 24, but is not necessarily complete for purposes of Rule 18.

- 1) For purposes of Rule 24 an application will be considered substantially complete if:
 - the general application form has been completed and signed,
 - appropriate initial fees have been submitted,
 - the application is accompanied by complete supplemental forms, as applicable, and
 - all information identified by the District, in writing or on the application or supplemental forms prior to the filing of the application, has been provided.
- 2) Standard engineering evaluation, A/C issuance, inspection, S/A and P/O issuance procedures will continue to apply except as follows.
- 3) If NSR applies, no benefit should be accorded the applicant for installing the equipment without an A/C. For example, in determining BACT cost-effectiveness, no costs associated with retrofitting controls to the existing emission unit should be allowed. Costs should be determined as if the

Engineering Division Manual of Procedures

emission unit had not yet been installed. Similarly, air quality impact analysis (AQIA) requirements should be applied as if the emission unit had not yet been installed.

- 4) If Rule 1200 applies, again no benefit should be accorded the applicant for installing the equipment without an A/C.
- 5) Temporary permit to operate provisions should be incorporated into the Authority to Construct, if approved. The procedures described above regarding Rule 24, Sections (a) and (b), and new conditions in the Authority to Construct apply.
- 6) If during the course of the evaluation, the project engineer determines that the emission unit is not operating in compliance with any applicable District rules and regulations, the engineer should consult with their senior engineer, inform the applicant verbally of the noncompliance, and advise the Compliance Division of the noncompliance. The Compliance Division will determine if the temporary permit to operate will be withdrawn and provide written notice of that determination to the applicant.

The project engineer must also advise the applicant, in writing, of the reasons why the equipment is not in compliance and what the applicant must do to bring the equipment into compliance. The project engineer should check with Compliance-regarding their decision on the temporary permit. If the Compliance Division has determined that the temporary permit to operate provided under Rule 24(c) should be withdrawn, the notice of that determination should be coordinated with the project engineer's correspondence regarding non-compliance and required remedial action(s).

When withdrawal of a temporary permit (or Startup Authorization) is necessary, the project engineer is to discuss with the senior engineer and Chief of Engineering the appropriate disposition of the pending application.

- E. Rule 24, Section (e) - Withdrawal of Temporary Permit to Operate
- Rule 24, section (e) codifies the District's ability to withdraw or modify a temporary Permit to Operate that may derive from an Authority to Construct, substantially complete application, or a Startup Authorization. Under Section (e), a temporary permit to operate can be modified or withdrawn, in writing, if operation of an emission unit is in violation of any condition of the temporary permit or an applicable provision of the District rules and regulations.

This ability to withdraw extends to cases where the District requests additional information on an application, the applicant fails to provide the information, and the application is cancelled pursuant to Rule 17. When the permit engineer advises the applicant, in writing, that the application is cancelled, the engineer is to also advise the applicant that the temporary permit to operate (via Rule 24 or a startup

Engineering Division Manual of Procedures

authorization) is being withdrawn effective 10 calendar days following the date of the District written notice.

To ensure that applicants are fully aware of this, the following standard condition is to be included in all Startup Authorizations:

"This Startup Authorization shall expire on the date specified above, or 10 calendar days following written notice from the District that the equipment is not in compliance with an applicable requirement and that this Startup Authorization is being withdrawn, or upon receipt of a Permit to Operate, or written notice of denial of a Permit to Operate, whichever is sooner."

7.3 Equipment Deficiency Letters (February 22, 1984)

These letters will be used only when an equipment deficiency has been noted and an S/A will not be issued. Such letters will notify applicants that operation of the equipment without written authorization is a violation of Rule 10(b) and may be subject to a civil penalty of \$1,000 per day and that the letter "is not a written authorization to operate."

7.4 S/As vs. AECPs (June 18, 1990)

The ARB audit report noted two occasions when S/A's were issued to sources, intending to comply by use of an alternative emissions compliance plan (AECP), before the AECP had been developed, reviewed and approved. ARB pointed out that compliance could not have been determined, and therefore an S/A should not have been issued, without an approved AECP in place. To ensure that this is not repeated in the future, although we expect few additional sources to comply with use of AECP'S, the following procedures shall be implemented by Engineering staff:

- A. A startup authorization shall not be issued on any VOC source that proposes to comply with a VOC rule through use of an Alternative Emissions Control Plan (AECP) unless the AECP has been submitted to the District, reviewed and approved, and the approved AECP is implemented as a condition of the S/A.

This requirement shall not apply to any current S/A's. However, if any such S/A's have been issued without a deadline for submittal and approval of an AECP, then the S/A shall be modified, in writing, within two weeks of this directive, to include conditions that require the AECP to be submitted and approved within thirty days.

- B. Authorities to Construct for sources pro n to implement AECPs shall not be approved until the source has submitted the AECP methodology and record-keeping provisions, and they have been approved by the District.

7.5 Expired S/As (October 21, 1991)

Procedures to be followed for facilities with expired Start-Up Authorizations (S/As).

Engineering Division Manual of Procedures

- A. If during a compliance inspection, the field inspector determines that a Start-Up Authorization has expired, the inspector shall complete the Expired Start-Up Authorization Report and submit it with the inspection report. The AQ HI will pass the report to the APC Aide.
- B. The Aide completes the lower portion of the form with the expiration date, the name of the appropriate AQ III and the date due back from Engineering. The form is to be returned by Engineering within three (3) working days.
- C. The Aide provides a copy of the report to the appropriate Senior Engineer and puts the original in the tickler file. Reports are filed according to the due date.
- D. The Aide will check the tickler file daily. All expired S/A reports which have been returned by Engineering with revised expiration dates will be distributed to the appropriate inspector with a copy to the engineering file. When the Aide determines the report is late or is returned without a revised expiration date a copy of the report will be annotated, dated and given to the appropriate AQ III for follow-up.
- E. If the S/A is not extended, the AQ III will notify the field inspector to issue a violation.

7.6 Startup Authorization/Permit to Operate Procedures (March 29, 1993)

In the context of discussing permit-streamlining issues with a local industry task force, two concerns were expressed that seem readily addressed.

- A. Startup Authorizations (S/A's) that are issued for short periods (30 or 60 days) and are continuously being extended for short periods immediately before or after S/A expiration. This places facility operators on near-constant alert, unsure whether the S/A will be extended, whether they need to petition for a variance or are at risk of receiving a Notice of Violation. On occasion, it also impose a burden on applicants to remind the project engineer to extend S/A's when issuance of the permit is likely beyond the applicant's control.

To correct this, the following revision to S/A procedures is to take effect immediately:

- 1) If upon inspection the project Engineer determine that an operation is in compliance with applicable requirements and a Permit to Operate (P/O) will be granted, an S/A should be issued with appropriate conditions for a period of 180s day. The S/A should be checked as being for purposes of allowing operation until a P/O has been issued.

Engineering Division Manual of Procedures

- 2) If an S/A is to be issued for purposes of shaking down, testing and/or evaluating the operation, the S/A shall be issued for up to 60 days with appropriate conditions. If more than 60 days is needed due to source test scheduling or the nature of the operation a shakedown period of up to 120 days can be granted with the approval of the Senior Engineer. Shakedown periods greater than 120 days must be discussed with Chief, Engineering Division, and the Senior Engineer prior to approval.
 - 3) A standard condition shall be added to all S/A's as follows:
This S/A shall expire on the date specified above or 10 days following written notice from the District that the equipment is not in compliance with an applicable rule, receipt of a Permit to Operate, or notice of denial of a Permit to Operate, whichever is sooner.
 - 4) Existing procedures regarding S/A's issued to allow operation while minor deficiencies, which do not affect the compliance status of the equipment, are being corrected shall remain unchanged.
- B. P/O's that are issued with conditions different than the S/A are creating some problems. If there are issues with the conditions, the applicant is faced with having to try and resolve them or file an appeal within 10 days. The applicant may feel it necessary to file an appeal so as not to lose their appeal rights.

To an extent practicable, S/A's issued to allow operation until a permit is received should have conditions that mirror the BEC conditions that will be applied to the permit. In addition, the project engineer shall provide the applicant with a copy of the conditions recommended for the P/O, if they differ substantively from the S/A conditions, at least 10 days prior to permit issuance. Any issues raised by the applicant are to be brought to the Senior Engineers attention. It is suggested that the applicant be provided the permit condition prior to or concurrent with the submittal of the permit recommendations to the Senior Engineer for approval.

8. Title V Permits

8.1 Instructions for Title V Application

INTRODUCTION

This application package contains the instructions and forms to apply for a Title V permit. All The application must be submitted with a base fee of \$2200 and a deposit of \$20,000 for permit evaluation and issuance.

The following forms are required for each application:

Stationary Source Summary [Forms 1401-A1 and 1401-A2]

Engineering Division Manual of Procedures

Insignificant Activity List [Form 1401-G]
Applicable Requirements Summary Check List [Form 1401-H1]
List of Permits by Equipment Category [Form 1401-H2]
Certification Statement [Form 1401-I]
Compliance Certification Schedule [Form 1401-K]
Abatement Devices [Form 1401-M]

The following form may also be required:

Schedule of Compliance [Form 1401-L]

The following forms are optional:

Alternative Operating Scenario [Form 1401-N]
Multiple Applicable Requirements Streamlining [Form 1401-O]
Outdated SIP Requirement Streamlining [Form 1401-P]
Permit Shield [Form 1401-Q]

EPA requires that you submit “information related to emissions sufficient to verify which requirements are applicable to the source” and the calculations which form the basis for this information. Generally, this means that facilities should submit emission unit-specific forms for each source. However, the District has already gathered most of the necessary information to calculate these emissions. EPA application streamlining guidance allows the applicant to reference the calculations of emissions for permitted emission units. Emission information is only required when the District would need to verify emissions levels and monitoring approaches for the following:

1. The facility proposes Plantwide Allowable Limits (PALs) or other plantwide emissions limits; or
2. The facility claims an exemption from an emissions-based applicable requirement for a single emission unit or multiple emission units and expects a permit shield to be granted by the District from this otherwise applicable requirement.

To avoid duplication of data, the applicant should only submit emission unit-specific forms where there is more recent data that differs from data previously submitted to the District. For information on emission unit-specific forms contact the District.

To avoid duplication of the data submitted, the District will send to the facilities a copy of the permit descriptions, permit content, a permit applicable rules list, and variance activity, and the dates of most recent inspection and source test that the District currently has in its database. If the information is correct and complete, the facility may return this information to the District.

Use the following forms if any part of the data is incorrect or missing:

Engineering Division Manual of Procedures

Combustion Emission Unit	Form 1401-B
Coating/Solvent Emission Unit	Form 1401-C
Organic Liquid Storage	Form 1401-D
General Emission Unit	Form 1401-E
Emission Control Unit	Form 1401-F

The District will require emissions data only if there is no data on record at the District. It is the facility's responsibility to submit correct emissions data.

Each of these forms are available on diskette. Two paper copies of the application is required. However, a facility may also submit a copy on diskette. Computer generated lists may be attached to the Applicable Requirements Summary Check List, Insignificant Activity List, and Compliance Certification Schedule forms in lieu of entering data on these forms, if the data is in the same format.

An applicant submitting "Trade Secret" information must supply in writing a "justification for this designation" pursuant to District Rule 176. The written justification is public record.

THE FOLLOWING ARE INSTRUCTIONS FOR FILLING OUT EACH FORM

FORM 1401-A1 STATIONARY SOURCE SUMMARY

This form is the basic facility application form and part of the Application Summary. The District will send this form together with the emissions summary of Form 1401-A2 to EPA instead of the text of the entire application. EPA does have the right to request the entire application from any facility. ***Please keep one copy of your entire application in case a copy is requested by EPA.*** The District will expect you to submit a copy to EPA if they request it. Please note that EPA uses the term "source" to mean plant or facility. Only one Stationary Source Summary form is required per facility.

Items I.1, and I.3 through I.5 are self-explanatory.

Item I.2, the SIC code, is a "Standard Industrial Classification" code. Use the SIC code that most closely describes your facility.

Item I.6, UTM coordinates, are Universal Transverse Mercator coordinates. These coordinates are used to define the location of your plant precisely. The District will enter the data on this line.

Item I.7, Source located within 50 miles of a state line, refers to other states and tribal lands. The District will provide a list of tribal lands and their location and has determined all sources are located within 50 miles of tribal lands.

Items I.8 through I.10 are self-explanatory.

Engineering Division Manual of Procedures

If an agent or contractor operates the source (facility), please fill in item I.11.

Item I.12, the responsible official, is defined in Regulation XIV, Rule 1401. The responsible official must sign the application and attachments where noted. This person is responsible for all statements in the application.

Items I.13 and I.15 are self-explanatory.

Item I.14, Application Contact, is the name of the contact person for this application.

Items I.16 requires description of processes and products at the facility. Include process flow diagrams if necessary for clarity.

The Federal Risk Management Plan referred to in Item I.17 is a plan that must be filed by facilities that store certain amounts of certain hazardous compounds. The compounds and amounts are listed in Part 68 of Section 40 of the Code of Federal Regulations (CFR). These facilities will be required to have a risk management plan that is registered with the appropriate agency. The District will not review the plan, but the existence of a RMP will have to be documented in the application and permit. Applications submitted before the requirements are final will be accepted without verification that RMPs are registered with appropriate agencies.

Item II requires the type of permit action: This application form will be used for initial applications and subsequent modifications. Please check the type of application or permit action.

Item III requires description of the permit action. The appropriate items should be checked.

The applicant should list all supplemental attachments submitted with this application under Item IV. The District forms themselves are not considered attachments but any attachments to the forms must be listed. Attach an additional sheet if necessary.

FORM 1401-A2 STATIONARY SOURCE EMISSIONS

If an applicant stipulates that it is a major source and subject to specific applicable requirements, it need not provide additional information in its application to demonstrate applicability with respect to those requirements. No emission information is required if the applicant stipulates the facility is a major source. No emission information is required if the applicant stipulates the facility is subject to specific applicable requirements.

Please check the major source threshold emissions which apply for the facility.

There is space allotted to reference emission inventory submittals to the District. Reference the inventory by name and the inventory year.

Engineering Division Manual of Procedures

Note: The applicant only needs to submit annual potential emissions data if the facility is new and there is no facility emissions inventory on file with the District. If this is the case the applicant should check the box indicating emissions calculations have been provided and attach them to the application.

FORM 1401-G INSIGNIFICANT ACTIVITY LIST

Use this form as a checklist for all insignificant activities included in Regulation XIV, Appendix A based on size or production rate. Regulation XIV, Appendix A, has the required criteria to make this determination. Checking activities identified at the facility is all that is required.

Any activity which is subject to an applicable requirement other than District Rules 50 and 51 cannot be considered an insignificant activity and must not be included in this listing.

FORM 1401-H1 APPLICABLE REQUIREMENTS SUMMARY CHECK LIST

This form is intended to list requirements. Applicable requirements which apply to an entire facility are listed first. The applicant should fill in equipment categories at the top of a column as needed. The applicant should then check appropriate boxes for applicable requirements on the form and attach emission unit permit number lists for specific equipment categories where necessary. Each column heading represents an equipment category with a unique set of applicable requirements and the applicant needs to provide a list of the permits for each of the equipment categories specified. The column "Future Effective Date" should also be completed. Where streamlining is employed note on this form and complete Form 1401-O [Multiple Applicable Requirements Streamlining], Form 1401-P [Outdated SIP Requirement Streamlining], and Form 1401-Q [Permit Shield], as needed. An example completed form for some specific equipment categories is available from the District.

The applicant is encouraged to make use of application streamlining processes for applicable requirements in completing this form. Not all the processes listed may be applicable to a specific facility. Examples of streamlining are included in the appendix to these instructions. The application streamlining processes are:

A. Multiple Applicable Requirements

The applicant can propose to combine multiple requirements. An applicant proposing to streamline multiple requirements applicable to the facility or emission unit must take the following actions to combine multiple requirements:

Step One - Provide a side-by-side comparison of all requirements that are currently applicable and effective for the specific emissions units of a source. Distinguish

Engineering Division Manual of Procedures

between requirements which are emission and/or work practice standards, and monitoring and compliance provisions.

Step Two - Determine the most stringent emission and/or performance standard (or any hybrid or alternative limits as appropriate) consistent with the streamlining principles and provide the corresponding supporting documentation relied upon to make this determination. This process should be repeated for each emissions unit and each pollutant combination subject to multiple applicable requirements for which the applicant is proposing a streamlined requirement.

Step Three - Propose one set of permit terms and conditions (i.e., the streamlined requirements) to include the most stringent emission limitations and/or standards, appropriate monitoring and associated recordkeeping and reporting, and such other conditions as are necessary to assure compliance with applicable requirements.

Step Four - The applicant must certify compliance with applicable requirements. If a source is certifying compliance only with the streamlined limit this should be indicated in an attachment to the certification, so that it is clear that the certification is being made with respect to a set of terms and conditions that the source believes “assure compliance” with all applicable requirements. In any event, a source may only certify compliance with a streamlined limit if there is information on which to base such a certification.

Step Five - Develop a compliance schedule (Form 1401-L) to implement any new monitoring/ compliance approach relevant to the streamlined limit if the source is unable to comply with it, upon permit issuance. The monitoring, recordkeeping, and reporting requirements of the applicable requirements being subsumed continue to apply in the permit until the new streamlined compliance approach is operative.

Step Six - Indicate on the application forms (Forms 1401-O and 1401-Q) that streamlining of the listed applicable requirements under a permit shield is being proposed and propose that a permit shield would be in effect stating that compliance with the streamlined limit assure compliance with the listed applicable requirements. All emission and/or performance standards not subsumed by the streamlined requirements must be separately addressed in the Title V permit application.

The applicant must demonstrate the adequacy of the proposed streamlined requirements guided by the following principles:

- a. The most stringent of applicable emissions limitations for a specific regulated air pollutant on a particular emission unit must be determined taking into account:
 - Emission limitation formats (emission limits in different forms must be converted to a common format and/or units of measure or a correlation established among different formats prior to comparisons);

Engineering Division Manual of Procedures

- Averaging times; and
 - Test methods prescribed in the applicable requirement.
- b. Work practice requirements in streamlining procedures will be treated as follows:
- A work practice requirement directly supporting an emission limit (i.e., applying to the same emissions covered by the emission limit) shall be considered inseparable from the emission limit for the purposes of streamlining emission limits. The proposed streamlined emission limit must include its directly associated supporting work practices, but need not include any work practice standards that are associated with and directly support the subsumed limit(s);
 - Where two or more analogous work practice requirements apply to the same emissions or emission point(s) but do not directly support an emission limit, they may be streamlined, as can multiple emission limits for the same emissions or emission point(s) (e.g., different leak detection and repair programs);
 - When multiple work practice requirements apply to different emissions or emission points, the multiple work practice requirements cannot be streamlined.
- c. Monitoring, recordkeeping, and reporting requirements should not be used to determine the relative stringency of the applicable requirements to which they are applicable.
- d. Facilities, where the preceding guidance does not allow sufficient streamlining, may at their option perform the following to justify additional or different streamlining:
- Construct an alternative or hybrid emission limit that is at least as stringent or more stringent as any applicable requirement, where it is difficult to determine a single most stringent applicable emissions limit by comparing all the applicable emission limits with each other;
 - Use a “State-only or District-only” requirement as the streamlined requirement (except that this streamlining is not allowed for a proposed District MACT standard) when it is more stringent than any applicable Federal requirement (the State-only or District-only requirement would then become federally enforceable in the Title V permit);
 - Use a more accurate and precise test method than the one applicable (except that this streamlining is not allowed for a proposed District MACT standard) to eliminate doubt in the stringency determination; and
 - Conduct detailed correlations to prove the relative stringency of each applicable requirement.

Engineering Division Manual of Procedures

- e. The monitoring, recordkeeping, and reporting requirements associated with the most stringent emission requirement are presumed appropriate, unless reliance on that monitoring would diminish the ability to assure compliance with the streamlined requirements. To evaluate this presumption, compare whether the monitoring proposed would assure compliance with the streamlined limit to the same degree of confidence as would the monitoring applicable to each subsumed limit. If not, and if the monitoring associated with the subsumed limit is also relevant to and technically feasible for the streamlined limit, then monitoring associated with the subsumed limit (or other qualifying monitoring) would be included in the permit. The recordkeeping and reporting associated with the selected monitoring approach may be presumed to be relevant only to the monitoring with which it is associated.

B. Outdated SIP Requirements

An applicant proposing to submit its Title V permit application based on a District rule that has been submitted for EPA approval rather than the current SIP version may take one of two courses of actions to streamline the application:

The first type of action is appropriate for District rules that (1) have been previously demonstrated to EPA's satisfaction to be at least as stringent as the approved SIP rule so as to assure compliance with it for all subject sources or (2) have been specifically identified in a formal agreement between the District and EPA for expeditious SIP processing. The latter category typically involves District rules pending SIP approval which do or could represent full or partial relaxations of the current SIP. The District and EPA have an up-to-date list of District rules which meet either of these criteria.

In preparing initial Title V permit applications with respect to such District rules:

Step One - The applicant must list or cross reference in its application all requirements from District rules which are eligible for this approach and refer to the list established and maintained for this purpose by the District.

Step Two - The applicant must identify in the permit application the current SIP requirements that the pending SIP revision would replace.

Step Three - The applicant may choose to certify compliance with all the requirement(s) of the local rule in lieu of the current SIP if there is sufficient information on which to base such a certification.

Step Four - The applicant may propose that a permit shield would be in effect upon permit issuance. For those listed District rules which are recognized by EPA as being able to assure compliance with the current SIP rule, the applicant would indicate in the application that a permit shield is being proposed to be incorporated into the permit to confirm this understanding. The permit shield request should be noted in Form 1401-Q [Permit Shield].

Engineering Division Manual of Procedures

The second type of action is appropriate where a District rule has not been demonstrated to EPA's satisfaction to assure compliance with the existing SIP or has not been included in the formal agreement as described above. An applicant may still propose to base its initial Title V application on other District rules pending SIP approval, provided it can show that compliance with the District rule would assure compliance with the current SIP (i.e., make an adequate demonstration consistent with the demonstration of the adequacy of the proposed streamlined requirements detailed under streamlining multiple requirements above in section A).

Step One - The applicant must list in its application both the applicable requirement of the current SIP and of the District rule and indicate that it has opted for streamlining approach. The applicant must develop and submit with its application sufficient documentation that demonstrates the District rule assures compliance with the applicable SIP. Guidance that sets forth the necessary elements and guiding principles are detailed above in Section A.

Step Two - The applicant may choose to certify compliance with the proposed requirements of the District rule if there is sufficient information on which to base such a certification.

Step Three - The applicant may propose a permit shield or similar permit language which would confirm that compliance with the District rule assures compliance with the relevant requirements of the current SIP.

The applicant should note streamlining of this type in Form 1401-P [Outdated SIP Requirement Streamlining].

C. Generic Requirements

The requirement to identify all applicable requirements, including those for insignificant emission units, can be addressed by standard or generic permit conditions with minimal or no reference to any specific emissions unit or activity. Different generic permit tables may be necessary to cover the situation of a particular type of insignificant emission unit which is governed by different applicable requirements (e.g., one to cover units subject to the SIP and one to cover units also subject to NSR).

If the source is operating out of compliance with an applicable requirement, please use the Schedule of Compliance form (Form 1401-N) to submit a proposal for achieving compliance. If the facility is operating under an abatement order, judicial consent decree, or administration order, please include the details in the Schedule of Compliance form.

The applicant needs to attach emissions information to this form for some specific requests. The applicant needs to supply the facility-wide annual emissions when the level of emission of a pollutant is to be used by the District in granting a shield relative to a decision of non-applicability where a source is claiming an exemption based on an emissions level cutoff in a standard that has been issued for the category to which the emissions unit potentially

Engineering Division Manual of Procedures

belongs. The emissions of a pollutant must also be provided if there is a Plantwide Allowable Limit (PAL) or other plantwide emissions limit proposed for the Title V permit.

FORM 1401-H2 LIST OF PERMITS BY EQUIPMENT CATEGORY

The applicant must list the permitted emission units on the form by equipment category for equipment categories listed on the Applicable Requirements Summary Check List [Form 1401-H1]. List the equipment category in the same order as Form 1401-H1 along with the associated emission units by permit number (or application numbers where applicable). Mark under the column “status” whether the emission unit is “O”, operational, “N”, non-operational, or “S”, new equipment without a permit operating under startup authorization (only to be used with an application number).

FORM 1401-I CERTIFICATION STATEMENT

Check the boxes in front of the statements that are true for your facility and have the responsible official sign the certification statement.

FORM 1401-K COMPLIANCE CERTIFICATION SCHEDULE

Compliance certifications must be submitted to the District periodically. This schedule shows how often this certification must be submitted for each emission unit and applicable requirement. For example, a facility may have a source for which monitoring data is required every month. The default frequency, in the absence of other requirements, is once per year. If an emission unit is not explicitly listed the default frequency is assumed. The rule reference should be listed under the heading “Applicable Requirements”.

A compliance certification is a certification by the responsible official that a source or facility is in compliance with an applicable requirement. Reports of recordkeeping or monitoring may be required to be submitted with the certification if so stated in the underlying requirement.

The Applicable Requirement Summary Check List and the Certification Statement Forms will be used for these certifications.

FORM 1401-M ABATEMENT DEVICES

Please list the permit number for the equipment associated with the abatement device, the abatement device description, and the sources or operations abated by the device. Abatement devices should be listed which are associated with processes subject to applicable requirements such as a scrubber or thermal oxidizer installed on a process to meet a RACT rule or NSPS requirement or which are separately subject to applicable requirements such as a RACT rule or NSPS requirement. Some equipment should not be listed as abatement devices on this form. Some examples are a mist eliminator installed on a tank containing water to eliminate, for safety purposes, water droplets generated or a muffler on a lawn mower which abates noise but also reduces particulate matter emission. Control equipment installed on insignificant activities such as welding operations should

Engineering Division Manual of Procedures

not be listed. Measures such as low NO_x burners, injection timing retard, and the use of high volume low pressure coating application equipment should also not be listed.

FORM 1401-L SCHEDULE OF COMPLIANCE

For each non-complying source, describe how the emission unit will achieve compliance. Propose a schedule to correct the deficiencies. Include a schedule for progress reports. Reports must be submitted at least every six months. If the source is operating under a judicial consent decree or administrative order, the Schedule of Compliance must be at least as stringent. The rule reference should be listed under the heading “Applicable Requirements”. Please enter the attachment identifier, e.g., Attachment A, under the heading “Compliance Schedule Attachment”. Please attach any associated Hearing Board Order. The attachments should be numbered, L1, L2, etc.

FORM 1401-N ALTERNATIVE OPERATING SCENARIOS

This form can be used by facilities that wish to describe alternative operating scenarios. If desired, an alternate operating scenario with the maximum allowable throughput can be described for the District’s review. Examples of alternative operating scenarios are included in the appendix to these instructions.

FORM 1401-O MULTIPLE APPLICABLE REQUIREMENTS STREAMLINING

ments. The applicant should list the multiple applicable requirements and identify the streamlined requirement. The detailed analysis including the permit shield proposed for the streamlining should be attached. The process for streamlining multiple applicable requirements includes proposing a permit shield. The process by which a facility would determine a streamlined requirement and identify requirements to be considered under a permit shield are discussed under the instruction for Form 1401-H. The detailed analyses should be referenced on this form and numbered as Attachment O1, O2, etc. Examples of streamlining are included in the appendix to these instructions.

FORM 1401-P OUTDATED SIP REQUIREMENT STREAMLINING

This form can be used by facilities that wish to submit a Title V permit application based on more recently adopted District rule requirements rather than the current SIP rule. The applicant should list the outdated SIP rule and identify the current District rule and include the District rule revision date. The applicant should indicate if a permit shield is proposed. The detailed analysis including any permit shield proposed should be attached. The detailed analyses should be referenced on this form and numbered as Attachment P1, P2, etc.

FORM 1401-Q PERMIT SHIELD

Engineering Division Manual of Procedures

This form must be used by facilities that are requesting a permit shield. Identify the emission unit(s), the requirements to be shielded and the basis for the shield. If the basis for the shield doesn't fit in the space provided attach an additional sheet. These additional sheets should be referenced on this form and numbered as Attachment Q1, Q2, etc.

8.2 Instructions for Title V Engineering Evaluation Process (revised 3/2014)

INTRODUCTION

For any action requiring a Title V permit application, given the District's permitting structure, a District application will be required and therefore is expected to precede the Title V application. Permit engineering staff should be vigilant for the receipt of a District application from a Title V source. Upon such receipt, the project engineer must notify the Title V engineer with the objective of discussing the nature of the project and determining Title V requirements and, most importantly, into which Title V track it falls. The following table lists District Title V permits, including those for which applications have been received, but have yet to be issued.

Facilities With Issued Title V Permits	
Permit Record#	Title V Facility Name
TVP-00037	Orange Grove Energy, L.P.
TVP-00036	El Cajon Energy LLC
TVP-00032	Fleet Readiness Center Southeast
TVP-00031	SFPP, LP
TVP-00030	SD City of Metro Wastewater Biosolids Center
TVP-00029	Otay Landfill Gas LLC
PTO-974746	Neo San Diego LLC
PTO-960391	Applied Energy LLC
PTO-960383	Fleet Readiness Center Southwest
PTO-960380	USN Air Station NORIS
PTO-971535	Minnesota Methane LLC Miramar
PTO-975482	Minnesota Methane San Diego LLC North City
PTO-979681	SDG&E Cuyamaca Peak Energy Plant
PTO-960991	Solar Turbines Inc.
PTO-978119	Chula Vista Energy Center LLC
PTO-978478	Escondido Energy Center LLC
PTO-960998	Applied Energy LLC MCRD
PTO-978585	Calpeak Power Border LLC
PTO-971227	Otay Landfill, Inc.
PTO-978586	Calpeak Power Border LLC
PTO-974488	Cabrillo Power I LLC
PTO-961008	SD City of Metro Wastewater Department

Engineering Division Manual of Procedures

PTO-960992	General Dynamics NASSCO
PTO-984123	SDG&E Miramar
PTO-978248	Wildflower Energy LP / Larkspur
PTO-961006	City of San Diego / Env Svc Dept / Miramar LF
PTO-961005	SD Co of Pub Wks San Marcos LF
PTO-971226	Sycamore Landfill Inc.
Facilities With Pending Title V Applications	
APP-002026	Otay Landfill Gas, LLC (Toro Energy)
APP-001247	Otay Mesa Energy Center
APP-002924	Sycamore Energy

Each application for an initial Title V permit must be submitted with a onetime non-refundable processing fee of \$95 and a deposit based on an estimation of the cost of the permit work (the current default for initial permits) is \$20,000 which has shown to be reasonably representative of typical initial Title V permits in accordance with District Rule 40. Fees for permit renewals, revisions and other changes should be estimated on a case-by-case basis. Fee estimates for Title V renewals have historically fallen in the range of \$8,500 – 9,000, and this estimate range appears reasonable for covering most renewals.

The following forms are required for each initial Title V permit application. These forms and their completion are discussed on the District's website:

Stationary Source Summary [Forms 1401-A1 and 1401-A2]

Insignificant Activity List [Form 1401-G]

Applicable Requirements Summary Check List [Form 1401-H1]

List of Permits by Equipment Category [Form 1401-H2]

Certification Statement [Form 1401-I]

Compliance Certification Schedule [Form 1401-K]

Abatement Devices [Form 1401-M]

The following form may also be required:

Schedule of Compliance [Form 1401-L]

The following forms are optional:

Alternative Operating Scenario [Form 1401-N]

Multiple Applicable Requirements Streamlining [Form 1401-O]

Outdated SIP Requirement Streamlining [Form 1401-P]

Permit Shield [Form 1401-Q]

Engineering Division Manual of Procedures

EPA requires submittal of “information related to emissions sufficient to verify which requirements are applicable to the source” and the calculations which form the basis for this information. Generally, this means that facilities should submit emission unit-specific forms for each source. However, the District has already gathered most of the necessary information to calculate these emissions. EPA application streamlining guidance allows the applicant to reference the calculations of emissions for permitted emission units. Emission information is only required when the District would need to verify emissions levels and monitoring approaches for the following:

1. The facility proposes Plantwide Applicability Limits (PALs) or other plantwide emissions limits; or
2. The facility claims an exemption from an emissions-based applicable requirement for a single emission unit or multiple emission units and expects a permit shield to be granted by the District from this otherwise applicable requirement.

To avoid duplication of data, the applicant should only submit emission unit-specific forms where there is more recent data that differs from data previously submitted to the District.

An applicant submitting information claimed to be "Trade Secret" must provide written justification pursuant to District Rule 176.

8.3 Title V Permit Changes and Modifications

Operational Flexibility or Section 502(b)(10) Change

Under Section 502(b)(10) of the CAA, codified at 40 CFR § 70.4 (b)(12), certain changes qualify as “operational flexibility.” These are operational changes that do not require a modification of the Title V permit.

A **Section** 502(b)(10) change cannot include any of the following categories:

1. **A change that would contravene an existing federally enforceable monitoring, (including test methods) record keeping, reporting or compliance certification permit condition.** If the change necessitates changing an existing permit condition for monitoring, record keeping, reporting, testing, or compliance certification, then it cannot qualify as a 502(b)(10) change.
2. **Exceedance of an allowable emission limit in a permit.** If the Title V permit has an emissions cap for one or more pollutants on the entire facility or on part of the facility, and the change would result in emissions above that cap (and therefore necessitate an increase in the cap), it cannot be a 502(b)(10) change. Also if a source has a specific expressed emission limit (i.e., mass per unit time such as lb/hr or concentration such as gr/dscf) and that emission limit must be increased due to the change, it also cannot be a 502(b)(10) change.

Engineering Division Manual of Procedures

A Section 502(b)(10) change only requires that the applicant file Form 1410-C for the change along with the standard District general application form (App116) and supplemental application form (if necessary). The engineer receives a copy of the entire application from permit processing. An applicant must provide EPA seven days notice before making a Section 502(b)(10) change. More importantly, an applicant must first obtain any necessary District Authority to Construct or revision to an existing Permit to Operate before making such a change.

The project engineer, in reviewing the application for completeness, should note that the applicant has requested a Section 502(b)(10) change. The project engineer should also note if the applicant has requested an affirmative determination that the District agrees the change is a Section 502(b)(10) change. Historically, requests for affirmative determination are rare because they delay the applicant's ability to proceed. The engineer should engage the applicant directly as a start if there is a question whether the proposed change qualifies as operational flexibility or is actually another type of change under Title V.

No Affirmative Determination Requested

Provided the applicant has not requested an affirmative District determination that the change is a Section 502(b)(10) change, the project engineer follows the standard District procedure to process the permit.

Affirmative Determination Requested

If, however, the applicant has requested an affirmative District determination, the project engineer should consult with the Title V engineer (or Senior Engineer) to find out if the District agrees that the change is a section 502(b)(10) change. In the case where the District agrees with the applicant, the project engineer follows the standard District procedure to process the application. If the District determines the change does not qualify as operational flexibility, the engineer will notify the applicant about the determination and the applicant will need to request that the change be processed under a different modification track. If this should occur, the project engineer will need to follow the instructions for the appropriate Title V modification track listed below.

Because District permitting requirements are often more stringent than federal requirements, a District A/C or revised District P/O is often required prior to an operational flexibility change under the CAA. Because it may result in an additional P/O or revised P/O, and the District has an interest in mirroring District permit conditions with those in the Title V permit, most op-flex changes are made at the time of the District permitting process. However, the provision under Section 502(b)(10) allow changes that qualify to be incorporated at the time of the next Title V permit action such as a renewal, modification or administrative amendment.

Administrative Permit Amendment

Engineering Division Manual of Procedures

An administrative permit amendment is a change to the terms and conditions of a permit that are approved pursuant to Rule 1410(i) and 40 CFR § 70.7(d). Types of changes that qualify for administrative permit amendments include address changes, corrections to typographical errors, changes of ownership and incorporation of NSR or PSD permits issued according the enhanced authority to construct procedures specified in Rule 1410(q). The enhanced authority to construct, which is discussed in more detail in the following section, fulfills substantive and administrative requirements under Title V, but does so during the District's construction review. Because these requirements are accomplished during construction review, the Title V change can be processed subsequently as an administrative amendment, whereas normally it would require additional work under another type of Title V change (minor or significant modification), and may require public notification.

The administrative permit amendment requires only that the applicant file Form 1410-A for the amendment, along with the standard District general application form (App 116) and any supplemental application forms.

Enhanced Authority to Construct

Pursuant to District Rule 1410(q), and at the request of the applicant, The Enhanced Authority to Construct process allows for public comment and EPA review of a project before installation. Because the procedural requirements of Title V are satisfied during the A/C process the permit modification can be incorporated into the Title V permit once the project is installed by the Title V *administrative permit amendment* process, without further public notice. The steps detailed will be limited to the enhanced A/C process.

To file for Enhanced Authority to Construct, the applicant submits Form 1410-E along with the standard District general application form (App 116) and any supplemental application forms and, if necessary, additional Title V permit application forms for compliance schedule, compliance assurance monitoring (under 40 CFR § 64, if applicable), SIP gap streamlining, alternative operating scenario, etc.

The processing steps are:

- The project engineer informs the Title V engineer that the applicant has requested an enhanced process for issuing the A/C
- The project engineer coordinates with the Title V engineer in developing the A/C conditions.
- The Title V engineer or Senior Engineer will ask the project engineer to include an underlying rule reference for each condition and this must be reviewed by the Title V engineer or Senior Engineer.

Note: Because EPA and the public review the proposed A/C conditions as potential operating conditions, the project engineer and Title V engineer should incorporate the operating conditions into the A/C (this is usually the case, but here

Engineering Division Manual of Procedures

it becomes particularly important that the conditions appear as they will in the Title V permit). Any changes to these conditions will require an additional modification procedure and potentially require a separate public notice and another EPA review, which would largely eliminate the utility of the enhanced A/C process.

- The project engineer must include a condition requiring submittal of an initial compliance certification as follows:

“The permittee shall submit to the District and to the federal EPA an annual compliance certification for the modified equipment, in a manner or form approved in writing by the District, for the previous calendar year that includes the identification of each applicable term or condition of the final permit for which the compliance status is being certified, the current compliance status and whether the modified equipment was in continuous or intermittent compliance during the certification period, identification of the applicable permitted method used to determine compliance during the certification period, and any other information required by the District to determine the compliance status. The annual compliance certification for each calendar year shall be submitted no later than March 1 following each calendar year.”
- The engineer will send a draft copy to the facility for review and comment.
- Under the enhanced A/C process, the applicant is not allowed to operate prior to inspection and issuance of temporary authorization under Rule 1410(b)(2) to operate. [Rule 24 does not apply and is supplanted by Rule 1410 for the enhanced A/C process.]
- Once the draft A/C is prepared by the project engineer, a 30-day notice is prepared and sent to affected states. This includes Indian tribes, such as Pala, that have requested and received EPA’s agreement as to this designation. As of April 2013, the District has extended its distribution to all tribes in San Diego County via an email list.
- The project engineer also prepares for EPA Region IX a cover letter that details the project and transmits the proposed A/C for EPA’s 45-day review.
- If comments are received, responses to these comments are prepared and for review by the Title V engineer or Senior Engineer. Should any comments require substantive changes in the terms of the A/C, these changes will be sent to EPA Region IX. The submittal of changes restarts EPA’s 45-day review period.
- If EPA objects to any terms of the A/C, the Title V engineer or Senior Engineer works with EPA to resolve the issues that EPA raises as objections to the proposed A/C.

Engineering Division Manual of Procedures

- If EPA does not object, under the request of an administrative permit amendment for the A/C conditions to be added to the Title V permit, the project engineer prepares a BEC request for all conditions that includes the condition rule references and adds, for the federal/local designation.

Once all issues are resolved, the equipment is ready for operation, and there is a reasonable expectation that the equipment will operate in compliance with all conditions and requirements, the project engineer can proceed to prepare a permit for the Title V engineer.

Note: As indicated above the permit must contain unchanged conditions from the A/C. The project engineer will inspect the equipment/operation and the Title V engineer will issue a revised Title V permit (usually under a request for an administrative amendment). If however, there is source testing or other testing that needs to be completed (what would commonly be referred to as “shakedown and testing”), the Title V engineer or Senior Engineer should issue written authorization under Rule 1410(b)(2) until testing can be completed and results confirming compliance with all applicable requirements are obtained. Changes that are deemed necessary through the results of testing or from operating experience must be added by going through an additional, separate Title V permit modification procedure.

Minor Permit Modification

A minor permit modification is a modification issued pursuant to Rule 1410(j) and 40 CFR § 70.7(e)(2) that will not trigger federally-mandated new source review.

Applicant applies with Form 1410-B along with the standard District general application form (App 116) and any supplemental application form(s). The project engineer should coordinate with the Title V engineer once it's determined that the applicant has requested a minor permit modification. The application should contain the proposed permit conditions.

Within 5 days of determining the application complete, the project engineer must notify EPA Region IX and affected states of the receipt of a complete application, describing the application. No other extra processing steps are required at this time. The applicant must first obtain any necessary District AC. The project engineer should coordinate the AC and conditions with the Title V engineer.

The object of the minor permit modification is to allow operation of modified equipment under a new set of conditions. Therefore, there are only extra processing steps for the project engineer for Title V prior to issuing the District permit to operate. The process is as follows:

- The project engineer develops the final set of conditions and includes a rule reference.

Engineering Division Manual of Procedures

- The Title V engineer reviews the condition list, and prepares a cover letter and the Title V application review summary (this can take the form of an abbreviated Statement of Basis) that details the minor permit modification. The proposed permit is attached and sent for EPA's 45-day review period.
- If EPA has no objection, the project engineer prepares a BEC request for all conditions that includes the condition rule references .

Significant Permit Modification

A significant permit modification is a modification that does not qualify as a minor modification or that will trigger federally-mandated new source review. Significant modifications are processed pursuant to Rule 1410(k) and are required to include an opportunity for public review and comment as well as review by the federal EPA and affected states.

The applicant applies for a significant permit modification by completing and submitting, at a minimum, the following forms:

- Stationary Source Summary [Forms 1401-A1 and 1401-A2]
- Applicable Requirements Summary Check List [Form 1401-H1]
- List of Permits by Equipment Category [Form 1401-H2]
- Certification Statement [Form 1401-I]

Aside from these required forms, the applicant may request other Title V program options such as, multiple applicable requirements streamlining or a permit shield, so that other supplemental Title V application forms may also be submitted. The applicant must first obtain any necessary District A/Cs. The project engineer should coordinate the A/C and conditions with the Title V engineer.

The Title V engineer performs the following tasks after receipt of the Title V application:

- Application completeness determination within 60 days of receipt
- If further information is required to determine completeness communicate any deficiencies to the applicant prior to completeness determination. If the source supplies the additional information promptly, the Title V engineer proceeds toward determination of completeness. If the information is not forthcoming after informal request, the engineer notifies the applicant in writing requesting (and specifying) the additional required information, allowing approximately 60 days for the applicant to provide the requested information.
- Once the information is received from the applicant, the Title V engineer completes evaluation of the application and prepares the permit documents for public and EPA review.
- Denial or cancellation of an application based on failure to receive the required information from the applicant may, on occasion, be justified but is rare and must only be initiated with the approval of the responsible senior engineer and/or the Chief of Engineering.

Engineering Division Manual of Procedures

The project engineer should inform the Title V engineer about the project, and the two engineers should discuss any issues associated with processing the two applications (timing issues, questions of which Title V track is appropriate, Title V issues that affect the District permit, etc.) . The objective is to ensure that the permit conditions for the District P/O are the same in the subsequently issued Title V permit, and to ensure, as the District P/O is being developed, that Title V requirements are included as necessary (for example, when they are not included in the “FW” section of the Title V permit).

After the proposed permit conditions for the District P/O have been prepared, the Title V engineer continues developing the proposed Title V permit. Ideally, the District P/O will be finalized with its issuance pending before the proposed Title V permit is prepared for public notice and EPA review, and communication between the project engineer and the Title V engineer will have ensured all requirements are met and the Title V conditions match the District P/O conditions. In the interest of matching the District P/O with that contained in Title V permit, issuance of the District P/O may be held until completion of the public comment period and EPA review. However, given that such comments are infrequent, the District P/O is typically issued once all other procedures are complete.

When the project engineer has finalized the District P/O for issuance and the text of the conditions is determined, the following should be performed:

- The Title V engineer prepares conditions with rule references under the Title V application and arranges each as either “District Enforceable Only Conditions” or “Federally Enforceable and District Enforceable Conditions” .
- The Title V engineer prepares a 30-day public notice to be submitted internally for posting in local publications, on the District’s website, and for distribution pursuant to the County’s list-server. (As of 2013, we are also distributing all public notices of Title V actions to San Diego tribes via email.)
- The Title V engineer prepares the Title V statement of basis (i.e., review report) . The public notice, permit, and statement of basis are sent to EPA and affected states for review ;these documents also comprise the substance of the public notice.
- If EPA has no objections (and either no comments were received from the public or any comments received were resolved before EPA’s final review), then appropriate revisions can be made to the statement of basis and the revised permit can be issued. The project engineer likewise proceeds toward issuance of the District P/O and submittal of a BEC as necessary .
- The project engineer will inspect the equipment/operation and the Title V engineer will issue a revised Title V permit.
-

Engineering Division Manual of Procedures

8.4 Title V Program Evaluation Program Changes (Tom Weeks, November 2010)

In mid 2008, the EPA Region IX conducted an evaluation of the District's Title V program. The findings and recommendations of that evaluation are included in a report titled "Title V Operating Permit Program Evaluation Final Report, September 30, 2008."

The objectives of the evaluation were to assess how the District administers its Title V program and the overall effectiveness of the program; identify areas of improvement of the program; areas where EPA's oversight role can be improved; and identify unique and innovative aspects of the District's program as best practices that may benefit other Title V programs. To a large extent, EPA was complementary of the District program and procedures. However, there were several areas where they recommended program changes.

EPA's findings and recommendations as well as the District's agreed upon actions are listed below. These program changes should be incorporated, to the extent feasible, in all future TIV permit actions.

1. **Finding:** Final Title V permits are not signed.

Recommendation: EPA recommends that all final Title V permits (initial permits, renewals, and modifications) be signed by a District official authorized to make permit decisions.

Action: The District Director will sign all final Title V permits.

2. **Finding:** SDAPCD's statements of basis do not adequately describe regulatory and policy issues or document decisions the District has made in the permitting process.

Recommendation: SDAPCD should expand the scope of its Coversheets to address all salient Title V permit issues. The District should supplement its checkbox and tabular format with explanatory text. SDAPCD should review Findings 2.7 through 2.10 of this report (and the associated recommendations), and implement EPA guidance on statements of basis (listed in Appendix F).

Action: A revised standardized evaluation summary format will be developed and used to provide summary and explanatory text and to document policy issues and regulatory decisions for all future Title V permits or Title V permit renewals.

3. **Finding:** SDAPCD does not address periodic monitoring in its Application Review Coversheets.

Engineering Division Manual of Procedures

Recommendation: SDAPCD should add a periodic monitoring section to its Application Review Coversheets and address monitoring on a case by case basis in the Coversheets. The Coversheets should describe the nature and rationale for any periodic monitoring that the District has added to the permit, or explain that no additional monitoring has been added, either because the monitoring in the underlying applicable requirement is sufficient to assure compliance or that the monitoring that has been added does not depart from previously agreed-upon levels.

Action: The District will add a periodic monitoring section to the evaluation summary and address monitoring on a case by case basis.

4. **Finding:** SDAPCD does not adequately describe its decisions to grant or deny requests for permit shields in its Application Review Coversheets.

Recommendation: SDAPCD should expand its discussions of permit shields in its Application Review Coversheets. The explanation should specify which type of shield has been requested, i.e., whether the regulation applies to the source or not. If a shield from an applicable requirement that a facility is subject to has been granted, the Coversheet should refer the reader to the permit conditions that incorporate the requirement. If a shield has been granted because a specific regulation does not apply to a source, the District should explain its concurrence with the applicant's nonapplicability determination with sufficient specificity to justify the shield.

Action: For shields that are granted, the evaluation summary will indicate that either the shield was granted based on a determination that the requirement was not applicable or a determination that the requirement was subsumed by permit condition. This information will be part of the standardized Coversheet.

5. **Finding:** SDAPCD does not adequately document Compliance Assurance Monitoring (CAM) in its Application Review Coversheets.

Recommendation: The District should address CAM in its Application Review Coversheets with sufficient detail for the reader to understand whether or not any emission unit at the facility is subject to CAM. When CAM does apply, SDAPCD should summarize the facility's proposed CAM plan and state whether the District is approving the plan or not. If the District is approving the plan but some aspects of the CAM monitoring in the permit differ from facility's proposal, these differences should be highlighted and explained.

Action: In the Coversheet, the District will add sufficient detail for CAM plans required in the permit and address CAM applicability. The evaluation summary will briefly summarize the facility's proposed CAM plan(s), if any, including the pollutant(s) subject to CAM and the parameters monitored and note whether the

Engineering Division Manual of Procedures

plan is approved by the District or not. The evaluation will also address emission units for which no CAM plan is required, but that would, a priori, appear to be required to have a CAM plan. For such units, the evaluation will indicate the reason no CAM plan is required (for example, the unit has a continuous emission monitoring system consistent with 40 CFR §60.1 or its uncontrolled potential to emit is less than the applicable major source threshold).

6. **Finding:** SDAPCD does not discuss any applicability requirements or exemption provisions in its Application Review Coversheets.

Recommendation: The District must discuss its applicability determinations in its Coversheets in cases where additional explanation or analysis would be useful.

Action: The District will discuss applicability requirements and exemption provisions, such as the examples noted, where additional explanation or analysis would be useful in an added section of the evaluation summary report. Information will be provided in sufficient detail to explain the basis of its decisions for these applicability determinations and for exemptions.

7. **Finding:** Title V permits for sources subject to CAM do not contain all the required elements of 40 CFR Part 64.

Recommendation: SDAPCD should ensure that Title V permits for sources with emission units subject to CAM contain all required elements of Part 64, including parameter ranges and definitions of excursions or exceedances. To be consistent with current Part 70 requirements, we also recommend that the District use the updated compliance certification language in all future permits in which there are any emission units subject to CAM.

Action: The District will ensure that Title V permits, including examples cited by EPA, contain all the required elements of Part 64. This will include an explicit definition of an “excursion” with respect to the CAM parameters. In addition, in situations where the complexity of the CAM parameter ranges are not easily incorporated in permit conditions (e.g., a complex relationship based on operational parameters), the District will attach a document to the Title V permit that clearly defines the CAM parameter ranges. Where it is necessary to refer to the parameter ranges, the permit conditions will reference the attached document in the Title V permit rather than an external document.

8. **Finding:** SDAPCD does adequately not reach out to communities that have identified environmental justice (EJ) issues with respect to permitting.

Recommendation: SDAPCD should consider the need for conducting Title V permit-related outreach in ways consistent with the changing demographic composition of communities near permitted sources.

Engineering Division Manual of Procedures

Action: The District will conduct Title V permit-related public outreach in communities near permitted sources. The District has been extensively involved in the EPA Region IX Barrio Logan Environmental Justice Demonstration Project. Spanish is the second most commonly spoken language in the District. A translated notice will be provided for action on applications for Title V facilities if five percent or more of the residents within any census tract in the area bordering a Title V facility are non-English speaking.

9. **Finding:** The District's Office of Community Outreach and Training primarily focuses internally on District staff training needs, not externally on Title V outreach to communities.

Recommendation: The District should consider balancing its community outreach needs with its competing internal needs to ensure effective community outreach.

Action: To enhance the outreach program and to better involve residents in Title V implementation decisions the District proposes to initiate the following enhancements: For community members with computer e-mail access, a list server system has been established. A marketing plan for promoting this system will be developed by the end of 2009.

The local Environmental Health Coalition has a newsletter. The District will work with them to explore including information about district programs in this document. It is made available in English and Spanish.

This District is a department in the local county government. This gives staff the opportunity to work with other governmental entities. Recently the District worked with the local libraries to provide information on air issues for their patrons. The District plans to explore using other public service locations for posting notices and providing information brochures.

The District has developed a handout that explains the Title V process. The District will make this document available for distribution at public outreach activities. Public Information at the District will be exploring all opportunities to reach out to affected communities.

10. **Finding:** The District publishes notices of proposed permits in the Daily Transcript which focuses on the business community. The Daily Transcript has a significantly lower circulation among the general public when compared to other newspapers of general circulation in San Diego County.

Recommendation: The District should publish its notices of proposed Title V permits in a newspaper with a larger circulation, in addition to or instead of the Daily Transcript, so that the greatest number of people in the County is aware of its Title V permitting activities.

Engineering Division Manual of Procedures

Action: The District will publish notices of proposed Title V permits in a newspaper of larger circulation as well as publishing notices in the Daily Transcript.

- 11. Finding:** The District has never received any comments from community members on proposed Title V permits.

Recommendation: SDAPCD should explore translations of notices and outreach materials and publication of public notices in a newspaper of general circulation to improve the effectiveness of the District's outreach and to provide the public with an increased opportunity to provide input on proposed Title V permits. (See Findings 4.1 and 4.3).

Action: The District will explore translations of notices and outreach materials (besides publishing notices in a newspaper of greater circulation as discussed above) to provide the public with increased opportunity to comment on proposed Title V permits. The District will use procedures developed for the Air Toxics Hot Spots program (as specified in District Rule 1210) to determine when translations will be required.

- 12. Finding:** The District publishes public notices of proposed Title V permitting actions on its website. However, additional information along with translations of notices of proposed Title V permitting actions in languages other than English would better inform the public regarding permitting actions.

Recommendation: EPA encourages SDAPCD to increase public access to the permitting process by posting relevant Title V information on its website including, but not limited to, proposed and final Title V permits, technical support documents, public notices, responses to public comments, citizen petition procedures, and general Title V information and guidance.

EPA recommends looking at websites of other permitting authorities for ideas. For example, the website of Bay Area Air Quality Management District, www.baaqmd.gov, includes the following Title V documents: proposed and final permits, technical support documents, public notice documents, comments from EPA and the public, and responses to comments.

Additionally, we strongly encourage SDAPCD to translate their notices of proposed Title V permitting actions into languages other than English in order to be responsive to the population in San Diego.

Action: The District will post notices, permits, supporting documents and other associated information on its website. As noted above, staff will provide translations of notices on a case-by-case basis.

- 13. Finding:** SDAPCD does not notify tribes of Title V permitting actions.

Engineering Division Manual of Procedures

Recommendation: SDAPCD should conduct outreach to tribes to assess their interest in being notified of Title V permitting actions. EPA can assist the District by providing contact information for tribes within San Diego County.

Action: The District has compiled a list of tribal contacts and will notify tribes in the county of Title V permitting actions.

- 14. Finding:** SDAPCD would like EPA to provide environmental justice training.

Recommendation: EPA will provide the District with EJ training and work with them on EJ issues identified by the District.

Action: The District is requiring staff to complete the EPA online course entitled Environmental Justice (EJ).

- 15. Finding:** SDAPCD does not send synthetic minor permits to EPA for review.

Recommendation: SDAPCD should provide EPA the opportunity to review proposed synthetic minor permits, and submit copies of the final permits.

Action: The District will in the future send proposed synthetic minor permits issued pursuant to Rule 60.2 to EPA for informational purposes and consider any comments by EPA. The District will also submit copies of final permits to EPA.

- 16. Finding:** SDAPCD uses parallel processing to streamline the issuance of modified NSR and Title V permits. However, it is not clear that all of the parallel processing procedural requirements are being consistently implemented.

Recommendation: SDAPCD should ensure that it follows all Title V procedural requirements when processing enhanced NSR permitting actions. Proposed NSR permits must be sent to EPA, ideally with a cover letter explicitly stating that the District is using the enhanced NSR process and is applying the Regulation XIV procedural requirements to the NSR permitting action, including submitting the draft ATC for EPA's 45-day review. After SDAPCD has authorized the startup of the new or modified emission unit, the District should amend the Title V permit via an administrative amendment and send a copy to Region 9. The Title V files should contain all relevant correspondence and documents related to enhanced NSR actions. The District may want to review the practices of the San Joaquin Valley Unified Air Pollution Control District, which effectively processes many enhanced NSR actions by issuing certificates of conformity which confirm the NSR action met the procedural requirements of Title V and submitting all necessary documentation with EPA.

Action: The District will ensure that all Title V procedural requirements are met with respect to enhanced NSR procedures. To accomplish this, additional training

Engineering Division Manual of Procedures

on existing enhanced NSR permitting procedures will be provided to staff. The District has also added a checklist noting the dates of completion of procedure elements.

9. Registration

9.1 Portable Engine Permitting and Registration (November 6, 2000)

Attached is a notice from ARB regarding information that should be verified when permitting or registering portable engines. In summary, any portable engine manufactured after January 1, 1996 must be certified by both U.S. EPA and ARB in order to be sold or used as a portable engine in California.

As is noted in the attached, the engine must be labeled by the manufacturer with a 12-character engine family name issued by U.S. EPA and ARB. When processing an application for permitting or registration of a portable engine, the engineer should obtain the make, model, serial number, year of manufacture, brake horsepower rating, and 12-character engine family name, then verify with ARB (contact listed on the attached) that the engine has been certified as meeting the required portable, non-road engine standards. If it has not, the engine cannot be permitted or registered as portable.

This verification is in addition to determining compliance with all applicable District rules. Time spent verifying the engine meets the certification standards (and evaluating the engine for compliance) should be charged to the permit or registration application. Fees for registration and permitting will be updated in the future to recover these costs.

9.2 Procedure for Review of Applications and Issuance of Certificates of Registration (January 2008)

This procedure has been developed to provide guidance when issuing Rule 12 or 12.1 registrations. Two options are available to applicants as shown on the attached process flow diagrams and the following procedure.

Option 1 – Application received electronically or via mail

1. Application Submittal - Applicant submits the application forms (App116 and the appropriate supplemented form) with appropriate fees.
2. Permit Processing Review - Permit Processing (PP) reviews the application to verify that correct fees and forms were submitted, creates the permit file, logs the application into the permit database and forwards the file to the Engineering Division (ED) after scanning out the application. If correct forms or fees have not been submitted, PP will notify the applicant and hold the application until sufficient fees are received to process the application. The PP review step should be completed within one working day of receipt of the application.
3. Engineering Review - The ED representative will pick up the file and scan it in. The ED representative will normally be an Engineering Technician but can be the assigned duty

Engineering Division Manual of Procedures

- engineering as necessary to address staff availability issues. A completeness review will be performed and an incomplete letter in the form of a standardized incomplete letter/checklist will be issued, if necessary, within three working days of application receipt. If the application is complete, the ED representative will perform emission calculations, complete the engineering evaluation and draft the registration certificate.
4. Consultation Meeting - The ED representative will contact the applicant and offer to meet with them to review and issue the initial registration certificate. If the applicant declines the consultation meeting, the ED representative will issue the initial registration certificate via mail or email. Issuance of the initial registration for complete applications shall be within 10 working days of receipt.
 5. New BEC Creation - If a new BEC is required to incorporate hours of use limitations the ED representative will request the new BEC using a standardized BEC template and forward the request to PP. Senior Engineer and Compliance Division approval is not required for these limited BEC changes.
 6. Permit Database Entry - The ED representative will enter the permit information into the permit database system and forward the file to the Senior Engineer. Permit database entry shall be within 30 days of application receipt.
 7. Senior Engineer Review - The Senior Engineer will review the file and approve it in the permit database system or return it to the ED representative for revision. After approval the Senior Engineer will forward the permit file to the Accounting Section for fee reconciliation.
 8. Fee Reconciliation - Following fee reconciliation, the Accounting Section will forward the file to PP.
 9. Application Cancellation - Incomplete applications for equipment subject to Rule 12 will be cancelled if the requested information is not supplied within 90 day of such request. Incomplete applications for equipment subject to Rule 12.1 will be cancelled if the necessary information is not supplied within 30 day of application receipt. Proposed cancellations must be approved by the Senior Engineer.

Option 2 – Walk-in Customer

- Jayli* 1. Application Receipt - Applicant arrives at the front desk with an application. All applications will first go to Permit Processing (PP) for verification that the correct forms and fees are available. If correct forms and fees are available, PP will copy the App116 form and contact the ED representative (the ED representative will normally be an Engineering Technician but can be the assigned duty engineer as necessary to address staff availability). If correct forms and fees are not available, PP will inform the applicant and provide them with information on how to complete the application. PP and the ED representative will work in parallel, where necessary from this point forward (see process flow diagram).
2. Engineering Review - The ED representative will escort the applicant to a meeting room. A completeness review will be performed and an incomplete letter in the form of a standardized incomplete letter/checklist will be issued if necessary. If the application is complete, the ED representative will perform emission calculations, complete the engineering evaluation, issue the initial registration certificate and explain the registration conditions to the applicant.

Engineering Division Manual of Procedures

3. New BEC Creation - If a new BEC is required to incorporate hours of use limitations the ED representative will request the new BEC using a standardized BEC template and forward the request to PP. Senior Engineer and Compliance Division approval is not required for these limited BEC changes.
4. Permit Database Entry - The ED representative will enter the permit information into the permit database system and forward the file to the Senior Engineer. Permit database entry shall be within 30 days of application receipt.
5. Senior Engineer Review - The Senior Engineer will review the file and approve it in the permit database system or return it to the ED representative for revision. After approval the Senior Engineer will forward the permit file to the Accounting Section for fee reconciliation.
6. Fee Reconciliation - Following fee reconciliation, the Accounting Section will forward the file to PP.
7. Application Cancellation - Incomplete applications for equipment subject to Rule 12 will be cancelled if the requested information is not supplied within 90 day of such request. Incomplete applications for equipment subject to Rule 12.1 will be cancelled if the necessary information is not supplied within 30 day of application receipt. Proposed cancellations must be approved by the Senior Engineer.

10. Banking

10.1 Banking Procedures (July 22, 1986)

The purpose of the following procedures is to ensure that the engineering evaluation corresponds with the requirements of the District's banking rules. Each person assigned a banking application first must become familiar with the latest version of the applicable rules before proceeding with the evaluation. The procedures are similar to the approach required for the evaluation of the A/C.

A. Application Review

- 1) Determine if the application is complete. Each initial application must have a Page 1 (standard application form APCD-16) and a Page 2 banking form, both of which must be filled out completely (see attachments). There must be a separate application for each piece of equipment, product line, system, process line or process that produces or performs a service independently of other equipment, product lines, systems, process lines or processes. The separate applications are needed to correspond with the provision of Rule 26.0(b) that requires a separate authorization for each of the items listed above. (Note: applications are not required for each pollutant.)
 - a. A second application package must be submitted for reclassifications from Class B to Class A status.

Engineering Division Manual of Procedures

- b. In addition, an application is required for the transfer of banked emission reduction credits (ERCs).
- 2) Applications are not complete if an adequate fee deposit has not been made. The supervising senior engineer will determine if the deposit is sufficient to cover the "time and material" costs of the evaluation--estimated to be a minimum of 30 hours of the project engineer's time for meetings with the applicant, site inspections, calculations, preparing publication, report writing, record-keeping, etc. for the first application. The supervising senior would spend a minimum of two hours in meetings, reviewing the work, updating records, calculating costs, etc. Each additional application submitted concurrently with the first would require four additional hours of the project engineer's time and 0.4 hours of additional time for the senior engineer. These estimates are based on experience. In addition, there is a base fee and a publication cost that must be part of the deposit. The applicant will be notified that a refund will be made if the costs are less than the deposit but that work will stop and additional money requested if the deposit is depleted. The applicant also will be informed that additional deposits may be required to respond to public comments and/or to hold a public hearing, if needed. The initial fee estimate does not include these costs.

At the time these procedures were developed, there was no database to estimate the "time and material" costs associated with evaluating a reclassification from Class B to Class A status. Reclassifications should not take as long as initial evaluations because the calculations and field inspections probably will be completed. Until further data are obtained, the deposit should be less than half the estimate for an initial submittal.

Rule 26.0(h) states that "...fees for an advisory opinion shall be paid..." This applies whenever a person owning a Class B ERC wants the District to determine whether the ERC is eligible for reclassification to Class A status [see Rule 26.3(b)]. Inform the owner of the Class B ERC that he will have to submit a deposit before the reclassification can be discussed.

- 3) According to Rule 18(a), the applicant will be notified that the application is complete or incomplete within 30 days of the date the application was received. (Note: The application is considered received when the requested fee deposit has been made.) If incomplete, the applicant must be notified in writing, what additional information is required to do the evaluation.

The project engineer will establish a tickler system for ensuring the work is completed in a reasonable period of time. The engineer will follow up on any request for additional information no later than three months after the initial request for information. The engineer will cancel the application if the applicant fails to finish any requested information within six months from the date the request was made, as required by Rule 17(c).

Engineering Division Manual of Procedures

B. Application Processing

The evaluation will justify a recommendation to grant or deny an ERC and, if granted, to justify a recommendation that either a Class A or a Class B ERC be issued. "Justification" means relating rule requirements to the information in the application. The evaluation report will consist of a logical discussion that can be followed easily by anyone reviewing the evaluation. The report will document that the following steps have been taken:

1) Determination of Whether an ERC(s) can be Issued

For initial applications only, first determine if the ERC(s) can be granted according to Rule 26.2. The following example shows how the report should read, assuming the application meets the requirements of Rule 26.2 after an adequate investigation.

Application(s) No.(s)_____ was (were) found to be in compliance with the requirements of Rule 26.2 Standards for Granting Banking of Emission Reductions because:

- (Name of applicant) was found to be in compliance with all the District rules and regulations that are applicable to the source, the source was not exempt from permit requirements and the applicant has kept current all District permits applicable to the source. (The latter requirement means that if a permit expires for failure to renew, the source is not eligible for banking. There must be an existing active or inactive status P/O with paid up fees in order for the source to be eligible for banking.)
- The SIP was reviewed and it was found that the emission reductions will be in excess of those required by the applicable SIP Control Measures or the SIP was reviewed and there are no SIP Control Measures associated with the emissions, if that is the case. Continue by stating that the reductions are not now, nor will they be, required by any adopted or proposed federal, state or District laws, rules, regulations, permits or orders. Furthermore, there is no conflict with the District's list of SIP Control Measures for which ERCs may not be issued. (The project engineer should ask AR/SD for assistance when evaluating compliance with the SIP provisions of the banking rules.)
- The emission reductions applied for have not been used or taken under any other provision of law.
- There is no plan to amend the SIP in a way that would affect this application.
- The emission reductions occurred after July 5, 1979.
- All the applicable requirements of the District's rules and regulations will be met if the applicant adheres to the requirements specified on the certificate(s), which are as follows: The emission reductions will be

Engineering Division Manual of Procedures

enforced by the surrender and cancellation of P/O No.(s) . . . This (these) permits were surrendered to the District on (enter date). (The surrendered permits are to be attached to the evaluation. It is not necessary to have the surrendered permits until it is determined that an ERC(s) can be granted. Once this has been established, notify the applicant that the permits for the shutdown equipment must be surrendered within 10 working days of the date of the notification letter or the application will be denied for failure to comply with Rule 26(a)(8). This paragraph applies only to shutdowns.

For modifications, the report should state that all the applicable requirements of the District's rules and regulations will be met if the applicant adheres to the following conditions added to P/O No.(s)_____. (List the conditions to be added and deleted. The revised P/Os are to have their own BEC codes. The BECs associated with banking are to be in the 2000 series.) Continue with the report as follows:

- The facility was inspected on (enter date). It was confirmed during the inspection that the emissions reductions have been implemented as required by Rule 26.2(a)(7).
- Before the shutdown (or modification, if applicable), the source was in operation for one year or more as required by Rule 26.1.

Therefore, having complied with all the requirements of Rules 26.2 and 26.1, the applicant is entitled to receive Emission Reduction Credit(s). (If the applicant hasn't complied, state that in the report instead. In that case, the report would conclude with a recommendation for denial.)

C. Classification of ERCs

After determining that ERCs can be granted, document the reasons for their classification to Class A or Class B status. For initial applications, the classification will be done according to Rule 26.0(c) and the following section. For applications requesting reclassifications, the determination will be made according to Rule 26.0(e) and the section on reclassification.

1) Initial applications:

For an initial application, state in the report whether the reduction is due to a modification or limited use of existing equipment, or if it is the result of a shutdown. State the reasons replacements are or are not likely to occur. If they are likely to occur, state whether or not the replacements will be located within the District and whether or not existing sources located elsewhere in the county will increase their emissions as a result of the shutdown. (For example, if an asphalt plant shuts down, the amount of asphalt produced in the

Engineering Division Manual of Procedures

county isn't going to change. The other existing plants will pick up the slack since they can produce it cheaper than hauling additional asphalt from outside the air basin. In this example, a Class A status can not be granted.) The applicant must prove that replacements are not going to take place that would offset the reductions. Rule 26.0(c) states, "The applicant has the burden to show that an ERC is Class A rather than Class B."

Rule 26.0(c)(iv) states that possible emission increases from replacement sources that will not likely be offset pursuant to Rules 20.4, 20.5, 20.8 or 26.8 should be considered. But this requires a knowledge of the future, which is impossible to obtain. Therefore, this provision should be ignored.

If there are no potential replacement emissions from new, existing or modified sources, the report should recommend that the ERC(s) be granted a Class-A status and proceed to the "emissions reduction calculations" section of these procedures.

If replacement emissions are possible, determine their amount (under "emissions reduction calculations"). If the replacement emissions are less than the reduction, document this in the evaluation and list the difference as the amount that may be listed under Class-A reductions. This eventually will require the issuance of two ERCs for the same equipment; one listing the Class-A reductions and the other the Class-B credits. If the replacement emissions are equal to or greater than the reduction, state this in the evaluation. In the latter case, only Class-B ERCs can be issued. Specify in the notification letter that this is one of the reasons the emissions are not considered "real and permanent."

2) Application for reclassification:

The evaluation of reclassification will be in the form of an addendum to the initial report. The addendum will state the reasons why the Class B status should or should not be changed to a Class A status. The evaluation will include the following information: (1) the length of time the equipment has been out of service or operated at a reduced level or modified, (2) shifts in economic demand within the District that are related to the product or service produced by the equipment that was shutdown, modified or that was limited in use, and (3) whether similar sources in the District have experienced an increase in activity as a result of the shutdown, modification or curtailed use of the equipment for which a Class B ERC was issued. The applicant is responsible for supplying this information.

If a Class B ERC was issued for the reason that a new source was expected to replace the reduced emissions, then that reason will be removed if an A/C for the new source hasn't been issued within a year of the date the District entered the ERC in the register. The applicant, according to Rule 26.0(f), must request

Engineering Division Manual of Procedures

that the above reason be removed. If this request is made, the search for an A/C for the new source must be documented in the evaluation (i.e., searched application card file, log, surveyed staff engineers, etc.).

It also must be documented in the report that the owner/operator surrendered the certificate showing ownership of the Class B ERC.

If a reclassification is approved by the senior engineer, the project engineer will ensure that accounting staff cancels the Class B ERC and issues a new Class A certificate.

D. Emissions Reduction Calculations

Calculations will be done according to Rule 26.1. The evaluation for an initial banking application will state the period of time actual operating emissions were averaged. The assumptions associated with each calculation will be documented as to their source. As with all engineering calculations involving permit work, the statement that a given number is based on "engineering judgment" with nothing further to support that number is unacceptable. Every number and assumption will be justified by references to test data and/or authoritative literature and/or documented applications of engineering principles.

E. Notification Letter

The applicant will be notified of the amounts of the emission reductions that can be used for banking credits and given 10 working days to respond if he disagrees with the amounts. If the District has decided to issue a Class B ERC, the notification letter will include the reasons why the ERC is not real and permanent, in order to comply with the last provision of Rule 26.0(c)(2).

F. Publication

After the amounts of emission reductions for banking have been determined, the next step is newspaper publication of a notice announcing the proposed issuance of the ERC(s). The project engineer will submit a draft of a public notice, similar to the example in the Appendix (which may be found following Section 3.9) and the application, folder and evaluation to the senior engineer. After the senior engineer has approved both the draft notice and evaluation, the project engineer will give the District's public information officer a typed, double-spaced copy of the approved notice and the proposed date of publication. The public information office needs to be notified at least three working days before the expected date of publication.

The public information officer will obtain a purchase order number from accounting. The public information officer then will call the San Diego Transcript for a pickup. All notices must be received in the Transcript office by noon of the day prior to the date of publication. The public information officer then will send a

Engineering Division Manual of Procedures

copy of the final notice and the date of publication to the deputy director in charge of engineering and to the project engineer. The project engineer will note on his calendar the date 30 days after the publication. This is the date when the period for public comment ends.

The clerical section will be notified that written public comments, if any, are to be sent to the senior engineer. If written comments are received, public hearing is justified. If there are no comments within 30 days of publication, the project engineer will proceed to the registration phase of these procedures.

G. Registration and Issuance of Certificate/Revised Permits to Operate

1) Registration

After the completion of the public comment period, the project engineer will go to accounting and register each ERC. At the top of each form, the engineer will enter the name of the company or organization owning the ERCs listed and the address where the emissions were reduced. (A sample form is in the Appendix following this section.) The registry forms will be organized in alphabetical order according to ownership. A separate sheet or separate set of sheets for each location where emissions were reduced will be completed.

Each column on the registry sheet contains the information associated with a given certificate. The certificate number is entered at the top of the column. This number is the same as the application number followed by a dash and a number corresponding to the order in which the certificate was issued. For example, 860134-1 may represent the same piece of equipment but a different pollutant than 860134. When a reclassification occurs, the certificate is cancelled and a new certificate is issued. The certificate number will be the same as the previous number but followed by an "R" (i.e. 860134-1R).

"Status" is the next column. Write "active" on the first line when the ERC is issued. When the ERC is cancelled, put a line through "active" and below it on the second line, write "cancelled." On the third line, write "transferred" if the cancellation was due to a transfer. When there is a partial transfer of credits, the certificate is cancelled and a new certificate is issued listing the reduced credits. When this occurs, write "reduced" on the third line. Write "expired" on the second line when an ERC expires.

The rest of the column will be filled out as follows:

- For "ERC Class," enter "A" or "B." Enter the pollutant on the next line. Enter the amount of the reduction in lbs./day and tons/year. The "day of issuance" is the date the registry is filled out and the certificate mailed. On the next line, enter the P/O number regardless of whether or not the P/O was cancelled.

Engineering Division Manual of Procedures

- For "type of equipment," enter "boiler," "turbine," "cogen," etc. to designate the equipment associated with the reductions. Enter the make or model of the equipment on the next line. List the serial number of the equipment if it is available. If not, use any available equipment designation (i.e. "unit 1," "process line No. 2," etc.). When an ERC is granted for a limited time period, enter the duration. Also enter the expiration date. If there is no time limit, enter "none" in the spaces labeled "ERC duration" and "date expired." When an ERC is transferred, enter the date, the amount in tons/year and the name of the organization receiving the ERC.

The person filling out the form will sign his name under the heading "person entering data" and write the date of entry under the heading "entry date."

2) Issuance of the ERC Certificate and, if Applicable, Re-issuance or Cancellation of the Associated P/O

After the ERCs are registered, the project engineer will fill in the blanks of draft certificate of ownership forms using pencil. (See Appendix following this section for sample form.) The certificate number is entered at the top of the form. The "owner" is the DBA of the company or organization that owns the ERC. For "source location," enter the location where the reductions took place. This information is needed to determine the distance of the offset from the new source. The "date the application for ERC was received by District" is the date the initial fee deposit was recorded on the application. "Equipment permit to operate No." and "pollutant" are self explanatory. The "I.D. No." is the one identifying the site where the reductions occurred. The "transfer date" is left blank until the certificate is returned to the District to be reissued because of a transfer or to be used as an offset. If the transfer date is filled in, the certificate is no longer valid. The "amount" of emission reduction is recorded in lbs./day and tons/year because these are the units addressed in the offset requirements of the NSR/PSD rules [see Rule 20.1(d)(4)]. In the space provided for "equipment description/credit qualifications," enter a brief description of the equipment that was modified or removed. State whether the equipment is operating with limitations, has been shutdown or removed. Add any other comments that might affect the status of the ERC.

After the certificate forms are filled out, the computer record will be updated. If the ERCs are due to a modification, a revised P/O with a new description, new conditions on maintenance and/or limited use is to be entered into the computer. (As stated earlier, the new BEC conditions will be in the 2000 series.) If the equipment is shutdown or removed, the project engineer will send a memo to the permit clerk, with a copy to his supervising senior engineer, requesting that the P/O for the equipment be cancelled.

Engineering Division Manual of Procedures

The certificate draft forms, the application folder, the surrendered P/Os and the application time sheets will be sent to the senior engineer. The senior engineer will review the draft certificates and P/O revisions or cancellations and make corrections if necessary. After the senior approves them, the draft certificate forms will be sent to clerical for typing. When the certificates are returned, the senior engineer will proofread them and, if there are not mistakes, sign them. He then will calculate the "time and material" costs. If the fee deposit covers the costs, the senior will sign and send the ERCs to the owner. A refund worksheet will be filled out, if the deposit exceeds the costs. If the costs exceed the deposit, the applicant will be sent a letter requesting additional funds. The senior engineer will withhold the certificates until the requested money is received. After it is established that sufficient funds have been received, the records of the engineering section will be updated to reflect the completion of the application process.

Copies of the banking certificates will be placed in the inactive files with the cancelled P/Os, in the active files if the equipment is modified and in a special banking file in accounting.

H. Application of ERCs and On-going Compliance

- 1) Each engineer will have a list of the owners of banked ERCs. The list will be updated and distributed by accounting every time there is a change to the banking registry. The list will be posted where it can be used as an easy reference.
- 2) Whenever an application that belongs to a listed ERC owner is received, the project engineer will determine whether the equipment is a replacement for equipment that was associated with banked emission credits. If so, the A/C for the new piece of equipment will have, according to Rule 20.8, a condition that either eliminates the ERC(s) granted or restricts the use of the new equipment to the extent necessary to keep the ERC(s) real and permanent.
- 3) ERCs cannot be used as "in lieu" reductions to avoid the BACT requirements of Rule 20.2. In lieu reductions must be contemporaneous. ERCs can be used only as offsets to achieve compliance with Rules 20.4 and 20.5 and no where else.
- 4) ERC certificates will be submitted with the applications for A/Cs when they are to be used as offsets. The project engineer will use the information on the certificate(s) in the A/C analysis. The certificates will be attached to the evaluation reports. Also, the project engineer will cancel the ERC(s) in the registry at the time the associated S/A is issued.

The engineering staff will contact the senior engineer in charge of their section if they have any question. Every project engineer assigned a banking

Engineering Division Manual of Procedures

application will follow these procedures unless expressly authorized by the senior engineer in charge of his section.

11. Certificate of Exemption (COE)

11.1 Certificate of Exemption (COE) Procedures (June 1, 2000)

A. Eligibility

The following equipment/processes are not eligible for a Certificate of Exemption:

- Categories of equipment/processes that are currently required to have permits per District Rule 10. However if there are no specific thresholds or design considerations in Rule 11, a COE may be considered for the equipment/process if all other criteria are met. Also, if design considerations are listed in Rule 11 and the equipment/process under review was not evaluated when the design consideration was established, a COE may be considered.
- Any equipment/process, which has a current Permit to Operate.
- Any equipment/process for which an application has been submitted for a Permit to Operate unless Compliance and Engineering agree the source could qualify for a COE provided no other District rules, state or federal law apply to the facility or equipment and no compliance problems are expected.
- Any equipment/process that is generally not regulated by the District.
- Any equipment/process which emit toxic air contaminants and does not pass the de minimus Rule 1200 screening. If the equipment/process can pass a screening risk assessment and compliance can easily be demonstrated, a COE may be granted at the discretion of the Engineering Senior and Compliance Division Chief.
- Any equipment/process which is not unique in nature and whose emissions are negligible. Such a category of equipment/process may be placed on the Permit Deferment List (PDL) at the discretion of the Engineering Senior and the Compliance Division Chief.

B. Routing of the COE application

- COE applications are first handled by the Permit Processing staff, for assigning and application number, deposit of fees and an application folder.
- The COE application is then sent to Compliance for data entry and evaluation.
- Based on the nature of the equipment/process emission source (VOC, combustion or toxics) the COE application will be routed to an engineer section as follows:
 - All VOC sources → **Chemical**
 - All other sources → **Mechanical**
 - Toxics which are not VOC's → **Toxics**

Engineering Division Manual of Procedures

- 1) The Senior Engineer will assign the application.
 - After the engineering evaluation is complete, reviewed and approved by the section Senior Engineer, the application is returned to Compliance for approval by the Compliance Chief and final data entry. Engineering staff does not have to perform any VAX data entry.
 - After final approval by the by the Compliance Chief, the Certificate of Exemption will be printed and mailed by Permit Processing.

C. Process for converting a Certificate of Exemption to a Permit to Operate.

If any equipment/process does not qualify for a Certificate of Exemption after review by Engineering and Compliance, the COE application can be converted to a permit application. A letter must be sent to the site informing them of the status of the application. The COE application must be canceled. The applicant will be required to complete a new application form and any applicable supplemental forms along with the required fees. Any remaining monies from the COE application may be transferred to the permit application at the applicants request.

D. Process for converting a Permit to Operate Application to a COE.

When an engineer reviews a permit application and determines that no prohibitory rules apply and the potential emissions will be minimal, the permit application may be converted to a COE application by taking the following actions:

- Obtain Senior Engineer and Compliance Division concurrence.
- Complete a COE application and supplemental form.
- Complete the normal COE evaluation process.
- Any fees not expended can be refunded to the applicant.

E. Timelines for processing COE applications - COE applications should be processed within **90 days**.

F. Fees for COE applications.

In order to fully recover costs associated with COE applications, a base fee will be charged to the applicants and additional time billed for equipment/processes that may require toxic review and/or further engineering evaluation. The base fee is calculated of using three hours of associate engineer time. The COE program is intended to be full cost recovery and additional fees for toxic review and/or further engineering evaluation will be calculated at the applicable labor rate. See Rule 40 schedule 94.

G. The Certificate of Exemption Program Process Outlined below (see also the attached flow charts):

- 1) Permit processing support staff will:

Engineering Division Manual of Procedures

- a. Verify that all forms are signed and money was received,
 - b. Assign an ID# - if it is a new facility,
 - c. Assign an application number, and
 - d. Create a Certificate of Exemption file.
- 2) The file will be sent to Compliance where it will be entered in the COE log book. The senior inspector will:
 - a. Review the COE application to verify that there are no specific exemption in Rule I 1, no prohibitory rules, or ATCM that may apply to the equipment/process,
 - b. Determine if an engineering review is needed, if yes, the COE application will be forwarded to the appropriate engineering division for evaluation and review,
 - c. Make a determination for the COE if an engineering review is not needed, and
 - d. Include inspector's reports, if applicable.
- 3) Senior engineer will assign an engineer or a dedicated project engineer and update the VAX app. file with the assigned engineer's initials and date.
- 4) The project engineer will review the forms to make sure they are complete and that all supporting information is included. If the forms are incomplete and/or they did not include all the information needed to make a determination the engineer will contact the applicant to obtain the missing information.
- 5) The project engineer will review the inspector's report, review the facility emissions estimate calculations, or calculate an emissions estimate if calculations are not provided. The project engineer will make a recommendation for exemption.
- 6) If the equipment/process:
 - a. Is recommended for exemption, the senior engineer will review and approve the project engineer's recommendation.
 - b. Does not qualify for an exemption, the engineer will return the file to the Compliance Division and the Compliance Division will notify the applicant by mail that they must submit an application with fees to obtain a District Permit to Operate for the equipment/process.
- 7) The file is then submitted to Compliance for approval by the Division Chief.
- 8) Upon approval by the Division Chief, Compliance support staff will update the VAX-COE-P/O file.

Engineering Division Manual of Procedures

COE-P/O	(input app#)
ID#	(input ID#)
App#	(input app#)
P/O code	(input c-for COE)
Equipment Description	(input equipment description)
BEC	(input BEC code)
Approval status	(input approval status A- approved D- denied C- canceled)
Date	(input date application approved by Division Chief)

The COE log book will be updated and the file returned to Permit Processing to be filed.

- 9) Once approved, the Certificate of Exemption will be printed with the next weekly run and mailed to the applicant. A copy will be sent to Compliance and the COE file.

H. Conditions for the Certificate of Exemption

BEC conditions for the COE will be developed. These conditions will reflect the operation of most of the equipment previously reviewed through the Permit Deferment List (PDL) process. If the equipment/process requires specific conditions, the assigned engineer will develop a new BEC.

Examples of standard COE conditions for the BEC include:

- 1) The equipment shall be operated according to the manufacturer's instructions/recommendation and as described in the COE application submitted to the District.
- 2) This Certificate of Exemption shall only apply to the equipment described above.
- 3) If applicable, records of material usage shall be maintained on a monthly basis and retained on site for two years and made available upon request.
- 4) The District reserves the right to change the exemption status of the above equipment/process at any time. The facility will be notified at least 30 days in advance of any changes which may affect the exemption status of the above equipment/process.
- 5) This Certificate Of Exemption must be maintained with the exempt equipment/process or be readily available at all times.

Engineering Division Manual of Procedures

I. Procedures for Engineering Division Project Engineer for the Certificate of Exemption (COE) Applications

The District has implemented the Certificate of Exemption Program. The Certificate of Exemption (COE) program is designed for equipment/processes that are not specifically exempt from permit requirements, but whose emissions are insignificant or negligible. This program will enable facilities to have the exemption status of such equipment/processes specified in writing without adding these insignificant site specific sources to Rule II (Exemptions from Rule 10 Permit Requirements).

Compliance Division will first review the COE application submitted by the equipment owner/operator to determine if the equipment process meets the requirements for an exemption from permits. The senior inspector will:

- Review the COE application to verify that there are no specific exemption in Rule II, no prohibitory rules, or ATCM that may apply to the equipment/process,
- Determine if an engineering review is needed. If yes, the COE application will be forwarded to the appropriate Engineering section for evaluation and review,
- Make a determination for the COE if an -engineering review is not needed, and
- Include inspector's reports, if applicable.

The project engineer will review the forms to make sure they are complete and that all supporting information is included. If the forms are incomplete and/or they did not include all the information needed to make a determination the engineer will contact the applicant to obtain the missing information.

The project engineer will review the inspector's report, review the facility emissions estimate calculations, or calculate an emissions estimate if calculations are not provided. The project engineer will make a recommendation for exemption, If the equipment/process:

- Is recommended for exemption, the senior engineer will review and approve the project engineer's recommendation.
- Does not qualify for an exemption, the engineer will return the file to the Compliance Division and the Compliance Division will notify the applicant by mail that they must submit an application with fees to obtain a District Permit to Operate for the equipment/process.

The Senior Engineer will review and approve the COE application and supplemental form. The file is then submitted to Compliance for approval by the Division Chief.

COE applications are charged a one time fixed fee of \$186.00. This fee is non refundable. No additional fees are required to process the COE. Generally a site

Engineering Division Manual of Procedures

inspection of the equipment should not be required. Engineers should charge their time spent on COF application to the following codes:

APP, COE, APPLICATION #, REVIEW

The labor data will not impact current COE fees but will be needed to make any appropriate adjustment to COE fees in the future.

12. Chemical Section Procedures

12.1 S/A vs. Alternative Emissions Compliance Plan (AECPP) (June 18, 1990)

A/Cs for sources proposing to implement AECPPs will not be approved until the source has submitted the AECPP methodology and record keeping provisions and the District has approved them.

An S/A will not be issued on any VOC source that proposes to comply with a VOC rule through the use of an AECPP unless the AECPP has been submitted, reviewed and approved by the District, and the approved AECPP is implemented as a condition of the S/A.

12.2 Rule 66

A. Rule 66 (m) Organic Materials Definition (July 24, 1992)

Rule 66(m) broadly defines "organic materials" to include a wide range of materials from organic solvents to fuels and solid, non-solvent materials. The District intended this rule to apply to liquid organic solvents, or liquid materials containing organic solvents. Therefore, for the purposes of this rule, Rule 66(k)'s definition of "organic solvent" will be substituted for Rule 66(m)'s "organic material" definition. For example, although Rule 66(o) addresses record-keeping for "organic material" (which is defined in 66(m)), "organic material" is to be read "organic solvent" (which is defined in 66(k)).

B. Rule 66(o) Record-keeping Requirements (October 24, 2000 – Jorge Lopez)

Rule 66(o), which became effective January 9, 1992, requires detailed daily record-keeping for a wide range of processes and operations. The District never intended to require daily organic material usage records for operations emitting small amounts of air contaminants. Accordingly, all Compliance action concerning Rule 66(o) is suspended for Dry Cleaning Equipment exempt from Rules 67.2, Distillation Equipment, Coating Application Cleaning Equipment, Asphalt Tar Kettles, Asphalt Tankers, Grass Coating and equipment or which are not required to

Engineering Division Manual of Procedures

have Permits to operate. Please be advised, this does not relieve sites from the duty to maintain records required to substantiate Rule 11 exemptions or required to be kept by Rule 21.

- 1) Sources will not be required to keep daily records of the usage of materials containing organic solvents that are exempt pursuant to Subsections 66(n)(3), (4) and (5).
- 2) For materials containing non-photochemically reactive solvents and used at temperatures at or below 200° F, daily records are not required but the applicant must keep monthly records which show the quantities of materials purchased. Daily usage records must be required if there is a reasonable expectation that a Rule 66 emission limit (e.g., 3,000 lbs./day) will be exceeded.

a. Rule 66 Policy Memo Comments (*October 22, 1992*)

A problem exists in item X.10 (c)(4). This item requires "usage" records and then states that purchase, inventory, and disposal (PID) "may" be acceptable. This equating of usage and PID has the potential to conflict with the established concept that usage equals emissions (that is, monthly usage records can be used to accurately calculate monthly emissions). PID records can be kept in a manner which equals monthly emissions. However, the type of PID records required to obtain accurate monthly usage/emissions is for the most part not kept by business at this time. Furthermore, such required PID records are tedious, time consuming and therefore burdensome.

For monthly PID records to equal monthly usage/emissions, all purchase records indicating mfg., ID#, and amount (container size) must be maintained and is being maintained in general by business. In addition, the site would have to conduct a detailed end of the month inventory. This inventory would have to list each item in the inventory by mfg., ID#, and amount (container sizes vary, and some containers may be partially full). Ending inventory for one month equals beginning inventory for the next month. This type of inventory record-keeping is not typically maintained at the type of small business affected by Rule 66.

Finally, the monthly disposal (or waste) records would have to list the Mfg., ID#, and amount of each material added to the waste drum. Current hazardous waste manifests, which are routinely kept at most sites, do not contain this information. Manifests generally indicate the date the waste was hauled off-site (not the month the waste was added into the drum), and the amount of a category of waste, such as "paint related waste" or "solvent".

Engineering Division Manual of Procedures

In summary, for sites to maintain PID records which equal monthly usage, and can therefore be used to accurately calculate monthly emissions, sites will very likely have to greatly modify their current inventory and disposal record-keeping methods. Given the tedious and time consuming nature of maintaining PID records which reflect monthly usage and monthly emissions, it is recommended that policy item IX(c)(4) be removed. Alternatively, it is recommended that specific operations or processes which are known to emit much less than 3,000 lbs. of organic solvent per day, do not use photochemically reactive solvent, and are not used at temperatures above 200° F, be added to the list of operations not required to keep daily usage records in the July 24, 1992 Rule 66 memo. We can always review a site's purchase records over a 12 month period to obtain a reasonable estimate regarding whether an operation in question emits close to 3,000 lbs. per day on worst case assumptions and average usage per operating day).

However, if the intent of this Rule 66(o) policy is not to be able to calculate monthly emissions from monthly usage records, then I recommend that the word "purchased" be substituted for the word "used" in the first sentence. In addition, I recommend that the second sentence be removed and the word "usage" be inserted between "daily" and "records" in the third sentence. This will eliminate the potential conflict between different forms of PID records and the meaning of the word 'usage'. In addition, this would eliminate the burden on business from having to greatly modify their inventory and disposal record-keeping.

- 1) For materials containing photochemically reactive solvents or solvents exposed to temperatures above 200° F, daily records of materials usage are required except as noted in the July 24, 1992, Chief, Compliance Division, memo regarding Rule 66.

12.3 Procedures for Estimating the Vapor Pressure of VOC Mixtures (June 20, 1990)

Estimating the vapor pressure of solvents that are blends of several VOCs will require either the volume or weight percentage of every component of the mixture be available from the manufacturer's specifications or from material safety data sheets. The calculation method in this procedure provides a value to be used in rule compliance determination for the vapor pressure of a mixture when there is no vapor pressure data for the mixture available. Results that are near rule limits and were obtained using this procedure may need additional evaluation.

The estimate uses the approximations that the liquid solution behaves as an ideal solution and that the gas phase behaves as an ideal gas. The calculation involves converting volume or weight percentage data to mole fractions of the liquid mixture and using these

Engineering Division Manual of Procedures

mole fractions and pure component vapor pressures to estimate the vapor pressure of the mixture at a temperature. The calculation may not apply to water-based mixtures or emulsions/suspensions. In this calculation, the portion of the vapor pressure of the mixture contributed by exempt solvents, i.e. 1,1,1-trichloroethane and others as stipulated in the definition of VOC, will not be included in arriving at a mixture vapor pressure. Pure component vapor pressure is available from a variety of references. Additionally, vapor pressure data for specific mixtures may be available from the manufacturer of the mixture and also may be found in material data files in the engineering division. If the manufacturer's vapor pressure data are used, the source of the data and test method need to be verified to substantiate using this data.

A. When using volume percentage of the liquid mixture, follow this procedure:

- 1) Check that the volume percentages add up to 100.
- 2) Convert the volume percentage to a fraction by dividing each by 100.

$$[\text{Volume fraction}] \text{ comp.} = [\text{Volume percent}] \text{ comp.} / 100$$

- 3) Convert the volume fraction to weight per gallon of mixture by multiplying the volume fraction by the density of the component of the mixture.

$$[\text{Weight per gallon}] \text{ comp.} = [\text{Volume fraction}] \text{ comp.} \times [\text{Density}] \text{ comp.}$$

- 4) Convert the weight of component per gallon of mixture to moles of component per gallon of mixture by dividing by the molecular weight of the component.

$$[\text{Moles per gallon}] \text{ comp.} = [\text{Weight per gallon}] \text{ comp.} / [\text{Molecular weight}] \text{ comp.}$$

- 5) Sum the number of moles of the individual components of the mixture.

$$\Sigma [\text{Moles}] = [\text{Moles}] \text{ comp. A} + [\text{Moles}] \text{ comp. B} + \dots + [\text{Moles}] \text{ last comp.}$$

- 6) Calculate the mole fraction of each component by dividing the number of moles of a component by the total number of moles obtained from the previous step.

$$[\text{Mole fraction}] \text{ comp.} = [\text{Moles}] \text{ comp.} / \Sigma [\text{Moles}]$$

- 7) Repeat the calculation in the previous step for each component.
- 8) Add the mole fractions of all the components of the mixture. This should be equal to 1. If it is not equal to 1, the total may be recalculated equal to 1 by

Engineering Division Manual of Procedures

multiplying the component mole fraction by the ratio of 1 to the total of all the component mole fractions.

$$\begin{aligned} &[\text{Mole fraction}] \text{ comp. (normalized to 1)} = \\ &[\text{Mole fraction}] \text{ comp.} \times 1 / \Sigma [\text{Mole fraction}] \text{ comp.} \end{aligned}$$

- 9) To calculate the vapor pressure of the component of the mixture, multiply the vapor pressure of the pure component at the desired temperature specified by the rule times the mole fraction of the component in the liquid mixture.

$$\begin{aligned} &[\text{Vapor pressure}] \text{ comp. in mix.} = \\ &[\text{Vapor pressure}] \text{ comp. pure} \times [\text{Mole fraction}] \text{ comp.} \end{aligned}$$

- 10) The total vapor pressure of the mixture is the sum of the vapor pressures of the components in the mixture.

$$\begin{aligned} &[\text{Vapor pressure}] \text{ total mix.} = \Sigma [\text{Vapor pressure}] \text{ comp. in mix.} \\ &\text{and } [\text{Vapor pressure}] \text{ VOC} = \Sigma [\text{Vapor pressure}] \text{ VOC comp.} \end{aligned}$$

B. When using weight percentage, follow this procedure:

- 1) Check that the weight percentages add up to 100.
- 2) Convert the weight percentage to a fraction by dividing each by 100.

$$[\text{Weight fraction}] \text{ comp.} = [\text{Weight percent}] \text{ comp.} / 100$$

- 3) Convert the weight fraction of the component to weight per gallon of the component by multiplying by the density of the mixture.

$$[\text{Weight per gallon}] \text{ comp.} = [\text{Weight fraction}] \text{ comp.} \times [\text{Density}] \text{ mix.}$$

Then follow Steps 4) through 10).

A.1 Calculating VOC Content of Mixtures When Water or Exempt Compounds are Present

To determine compliance with most District volatile organic compound (VOC) standards, VOC content is expressed as the mass of VOC per volume of material not including the volume of water and exempt compounds present in the material. This measure of VOC content is referred to as the mass of VOC per volume of material less water and exempt compounds. Exempt compounds are organic compounds that are not considered VOCs for purposes of determining compliance with VOC standards.

Situations often arise where the VOC content of a material must be calculated from the VOC contents of one or more components that are mixed together. For example, if two

Engineering Division Manual of Procedures

coating components are mixed together prior to application, the VOC content of the mixture must be calculated since compliance is based on the VOC content of the coating as applied. When there is no water or exempt compounds present, calculating the VOC content of such a mixture is relatively simple (see equation 4 below). However, if one or both of the coating components contain water or exempt compounds the calculation of the VOC content of a mixture expressed as mass of VOC less water and exempt compounds is more complex. The methods for calculating the VOC content in this case are discussed below.

Consider a volume, V_{m1} , of material 1 and a volume V_{m2} of material 2. If these two volumes are mixed together, the total mass of VOC present in the mixture is given by:

$$W_{ca} = V_{m1}C_{m1} + V_{m2}C_{m2}$$

where:

W_{ca} is the total mass of VOC present in the mixture,

C_{m1} is the VOC content of material 1 expressed as mass of VOC per volume of material, and

C_{m2} is the VOC content of material 2 expressed as mass of VOC per volume of material.

Assuming no volume change on mixing, the total volume of the mixture is given by:

$$V_{ma} = V_{m1} + V_{m2}$$

where V_{ma} is the total volume of the mixture. However, total volume of the mixture less water and exempt compounds is given by:

$$V_{nxa} = (1 - v_{x1})V_{m1} + (1 - v_{x2})V_{m2}$$

where:

V_{nxa} is the mixture volume less water and exempt compounds,

v_{x1} is the volume fraction of water and exempt compounds of material 1, and

v_{x2} is the volume fraction of water and exempt compounds of material 2.

Therefore, for a mixture of two materials, a formula for calculating the VOC content as mass of VOC per volume of material less water and exempt compounds is:

$$(1) \quad C_{ca} = \frac{W_{ca}}{V_{nxa}} = \frac{V_{m1}C_{m1} + V_{m2}C_{m2}}{(1 - v_{x1})V_{m1} + (1 - v_{x2})V_{m2}}$$

where:

Engineering Division Manual of Procedures

C_{ca} is the VOC content of the mixture expressed as mass of VOC per volume of material less water and exempt compounds,

C_{m1} is the VOC content of material 1 expressed as mass of VOC per volume of material,

C_{m2} is the VOC content of material 2 expressed as mass of VOC per volume of material,

v_{x1} is the volume fraction of water and exempt compounds of material 1, and

v_{x2} is the volume fraction of water and exempt compounds of material 2.

Calculating VOC Content as Mass per Volume

In cases where the VOC content expressed as mass of VOC per volume of material is needed, the following formula can be used:

$$(2) \quad C_{ma} = \frac{W_{ca}}{V_{ma}} = \frac{V_{m1}C_{m1} + V_{m2}C_{m2}}{V_{m1} + V_{m2}}$$

where C_{ma} is the VOC content of the mixture expressed as mass of VOC per volume of material.

Calculating Volume Fraction of Water and Exempt Compounds

If the volume fraction of water and exempt compounds for an individual material are not known directly but the weight fractions of water and each exempt compound in the material are known, the volume fraction of water and exempt compounds can be estimated. For each component of an individual material, the volume fraction of that component in the material can be calculated by:

$$v_i = w_i \left(\frac{\rho_m}{\rho_i} \right)$$

where:

v_i is the volume fraction of the component in the material,

w_i is the weight fraction of the component in the material,

ρ_i is the partial density of the component in the material¹, and

ρ_m is the density of the material.

¹ Note that the partial density of a component in the material is in general not equal to the density of the pure component. However, in the likely absence of other information, the partial density of the component in the material, ρ_i , can be assumed to be equal to the density of the pure component in order to estimate the component volume fraction. This is equivalent to assuming that there is no volume change on mixing (or that the solvent is an ideal solution).

Engineering Division Manual of Procedures

The volume fraction of water and each exempt compound are calculated separately. The total volume fraction of water and exempt compounds in the material, v_x , can then be determined by summing the volume fractions of water and all components that are exempt compounds.

Alternatively, if the volume fraction of VOCs and volume fraction of solids are known, the volume fraction of water and exempt compounds in the material can be found from:

$$v_x = 1 - v_c - v_s$$

where:

v_c is the volume fraction of VOCs in the material and

v_s is the volume fraction of solids in the material.

The volume fractions of VOCs and solids can be estimated from their individual or composite weight fractions and densities, if necessary (see above).

Additional Calculation Techniques

For a given material, the VOC content expressed as VOC mass per volume of material less water and exempt compounds is related to the VOC content expressed as VOC mass per volume of material, C_m , by:

$$(3) \quad C_c = \frac{C_m}{1 - v_x}$$

where C_c is the VOC content expressed as mass per volume of material less water and exempt compounds. Note that, if C_m and C_c are greater than zero, equation 3 can be rearranged to give the volume fraction of water and exempt compounds, v_x :

$$v_x = 1 - \frac{C_m}{C_c}$$

In this case, the volume fraction of water and exempt compounds can be determined if the VOC content of material and the VOC content of material less water and exempt compounds are known. Substituting for v_x in equation 1 gives an alternate formula² for calculating the VOC content of the mixture expressed as mass VOC per unit volume less water and exempt compounds:

² This equation is not valid if either of the materials do not contain any VOC. In this case, both C_c and C_m for the material would be zero.

Engineering Division Manual of Procedures

$$(1a) \quad C_{ca} = \frac{V_{m1}C_{m1} + V_{m2}C_{m2}}{\frac{C_{m1}}{C_{c1}}V_{m1} + \frac{C_{m2}}{C_{c2}}V_{m2}}$$

Equations 1 and 1a can be extended to more than two components by simply including appropriate terms in the numerator and denominator on the right hand side of the equations for each additional component (see Appendix).

If no exempt compounds or water are present, then $v_{x1} = 0$, $C_c = C_m$, and equation 1 for calculating the VOC content, C_{ca} , of a 2-material mixture can be rewritten as:

$$(4) \quad C_{ca} = \frac{V_{m1}C_{c1} + V_{m2}C_{c2}}{V_{m1} + V_{m2}}$$

where C_{c1} and C_{c2} are the VOC contents expressed as mass of VOC per volume less water and exempt compounds of materials 1 and 2, respectively³. However, equation 4 will not give correct results if exempt compounds or water are present—and the error may be large. Some examples calculating C_{ca} with equations 1 (correct) and equation 4 (incorrect) are given below. Using equation 4 to calculate the VOC content may give mixture VOC contents that are too high (Example 1), too low (Example 2), or—fortuitously—correct (Example 3).

³ Even though no water or exempt compounds are present in either material the VOC content of the material is still specified as mass of VOC per volume of material less water and exempt compounds for compliance purposes. Since there is no water or exempt compounds present, this specified VOC content is identical to the VOC content expressed as mass of VOC per volume of material.

Engineering Division Manual of Procedures

Conclusion

The key to calculating VOC contents of mixtures when water and exempt compounds are present is knowing the volume fraction of water and exempt compounds. This can be determined in several ways when one of the following pieces of information is known for a material:

- (1) The volume fraction of water and exempt compounds (see equation 1); or
- (2) If the VOC contents are not zero, the VOC content expressed as mass per volume of material less water and exempt compounds and the VOC content expressed as mass per volume of material (see equation 1a); or
- (3) The volume fraction of solids and volume fraction of VOCs; or
- (4) The weight fraction of water and all exempt compounds, the partial density of water and each exempt compound, and the total density of the material; or
- (5) The weight fraction of solids, the density of each solid, the weight fraction of VOCs, the partial density of each VOC, and the total density of the material.

EXAMPLES

Example 1.

Material property	Coating 1	Coating 2
C_m —VOC content, g/l	200	80
v_x —Volume fraction water and exempt compounds	0	0.9
C_c —VOC content, g/l less water and exempt compounds	200	800
V_m —volume of material added to mixture, liters	1	1

VOC content expressed as grams per liter less water and exempt compounds calculated by equation 1:

$$C_{ca} = \frac{(1)(200) + (1)(80)}{(1-0)(1) + (1-0.9)(1)} = 255 \text{ g/l}$$

VOC content expressed as grams per liter less water and exempt compounds calculated by equation 4:

Engineering Division Manual of Procedures

$$C_{ca} = \frac{(1)(200) + (1)(800)}{1 + 1} = 500 \text{ g/l}$$

Example 2.

Material property	Coating 1	Coating 2
C_m —VOC content, g/l	600	20
v_x —Volume fraction water and exempt compounds	0	0.9
C_c —VOC content, g/l less water and exempt compounds	600	200
V_m —volume of material added to mixture, liters	1	1

VOC content expressed as grams per liter less water and exempt compounds calculated by equation 1:

$$C_{ca} = \frac{(1)(600) + (1)(20)}{(1-0)(1) + (1-0.9)(1)} = 563 \text{ g/l}$$

VOC content expressed as grams per liter less water and exempt compounds calculated by equation 4:

$$C_{ca} = \frac{(1)(600) + (1)(200)}{1 + 1} = 400 \text{ g/l}$$

Example 3.

Material property	Coating 1	Coating 2
C_m —VOC content, g/l	200	20
v_x —Volume fraction water and exempt compounds	0	0.9
C_c —VOC content, g/l less water and exempt compounds	200	200
V_m —volume of material added to mixture, liters	1	1

VOC content expressed as grams per liter less water and exempt compounds calculated by equation 1:

Engineering Division Manual of Procedures

$$C_{ca} = \frac{(1)(200) + (1)(20)}{(1-0)(1) + (1-0.9)(1)} = 200 \text{ g/l}$$

VOC content expressed as grams per liter less water and exempt compounds calculated by equation 4:

$$C_{ca} = \frac{(1)(200) + (1)(200)}{1 + 1} = 200 \text{ g/l}$$

12.4 Equipment Descriptions for Surface Coating Operations (February 10, 1983)

All equipment descriptions contained in A/Cs, S/As and P/Os for surface coating operations will contain a description of the coating application equipment including type (conventional air atomized, HVLP airless spray, air electrostatic, disc electrostatic, Electro-deposition, etc.), the quantity (number of tanks, pressure pots, spray guns, other) and the manufacturer and model designations. Serial numbers will not be included because identical replacements are not a concern. These data will assist in future assessments of coating transfer efficiencies and the impacts of mandated transfer efficiencies on District rules. Also, these data can be used by the Compliance division to discern coating application equipment changes not made pursuant to A/Cs.

12.5 Streamlined Permit Process Review (June 21, 1993)

Rule 11 currently requires permits for vapor degreasers with vapor-air interface less than 5 square feet and cold solvent degreasers with liquid surface areas greater than 1 but less than 5 square feet. These degreasers are required to comply with the requirements of Rule 67.6. They can be summarized and provided for equipment operators to follow. Permit applications for these degreasers, therefore, should not require rigorous engineering evaluation and documentation. Additionally, the estimated ROG emission reduction from compliance with Rule 67.6 from these small degreasers is relatively small.

Accordingly, the District established a streamlined permit review process for small degreasers. The streamlined permit review process enables the District to expedite the determination of small degreaser's compliance with District rules, reduce permit review costs, and improve utilization of District resources.

Equipment owners are requested to submit a complete application package consisting of: District application form, SPR (Streamlined Permit Review)-R67.6 Form, Material Safety Data Sheets for the degreasing solvents, and the required permit fee. (see section XII.3 - Streamlined Permit Review Forms)

A. The streamlined permit review process will operate as follows:

Engineering Division Manual of Procedures

Owners of small degreasers will submit an application, SPR-R67.6 forms, and the applicable permit fee according to Rule 40. The SPR R67.6 forms contain checklists for equipment and standards of Rule 67.6. It requires owners to certify the equipment for compliance with Rule 67.6. A separate application will be required for up to 99 units of the same manufacturer and model number. A separate SPR-R67.6 form will be required for each manufacturer/model type using the same solvent.

Permit processing staff will log the application(s), assign application number(s), file documents in folders, and briefly review the SPR-R67.6 Forms to ensure all equipment and solvent information is provided, the boxes on Section 4 (for Standards of Rule 67.6) are marked, and SPR-R67.6 forms are signed.

If either an application or SPR-R67.6 form is unsigned or incomplete, permit processing staff will notify the applicant by phone and may attempt to obtain information not provided on the SPR-R67.6 form. Information obtained by phone must be documented on the SPR-R67.6 form or on a separate memo. Otherwise, the incomplete Supplemental Forms will be returned to the permit applicant with a form letter specifying the deficiencies. The permit processing staff will ensure that the application package is complete prior to forwarding to the assigned project engineer. Permit renewals will be handled in accordance with current District policy.

The assigned project engineer will briefly review the information in the package for compliance with applicable District rules. If the application package indicates that the equipment meets the standards of Rule 67.6 (and there are no NSR or toxic issues), the project engineer will not inspect the equipment prior to issuance of Permit to Operate. The project engineer will advise the applicant, by phone, of the requirements of Rule 67.6 and the need to ensure compliance with District rules. The Permit to Operate will be initiated immediately instead of issuing a Startup Authorization. The project engineer will update the VAX for issuance or denial of the Permit to Operate. If an application or SPR- R67.6 form does not demonstrate compliance, the project engineer will so advise the applicant by phone and in writing, and the application will be handled under the normal permit review process. Minor, easily corrected deficiencies may not kick an application out of the streamline process once they are corrected.

Compliance staff will inspect the facilities having only small degreaser Permit once, every three (3) years. Small degreasers installed at facilities that have other permitted equipment (i.e., paint spray equipment, >5 sq. ft. degreasers, I/C engines, boilers, etc.) will be inspected on a regular basis. If an inspector finds that the equipment described in a permit has been replaced with a unit of the same manufacturer and model number, but different serial number, the Inspector will request the Chemical Section (via the Senior Engineer) to update the Permit description for the next renewal. If a replacement unit is not the same manufacturer/model as a unit already permitted, or there is a new unpermitted unit,

Engineering Division Manual of Procedures

the Inspector will advise the permittee or owner to send the District a Rule 11(n) similar equipment replacement notice, if applicable, or to apply for a new/revised permit.

The goals of this process are to expedite determination of small degreaser's compliance with District rules, to reduce permit review costs, and to improve utilization of District resources.

12.6 Rule 67.5 Applicability to Slip Casting Operations (July 9, 1992)

Rule 67.5, revised in 1990, deleted the exemption for paper, fabric and film coating operations that do not use heating ovens.

The District does not consider ceramic slip casting to be a coating process therefore it is not subject to Rule 67.5. As a part of the District's Air Quality Strategy implementation, slip casting operations will be regulated under a separate source specific rule for semiconductor manufacturing.

12.7 Federal Restrictions on Uses of HCFCs

Attached is a notice from EPA regarding allowable and unapproved uses of HCFCs in Solvent Cleaning Operations. A number of HCFCs are identified as exempt from the VOC definitions of District rules and regulations and are not identified as toxic air contaminants under Rule 1200. In summary, under Title VI of the federal Clean Air Act, EPA has established restrictions on the use of HCFCs in many solvent cleaning and aerosol solvent applications.

As is noted in the attached:

- A. EPA prohibits the use of HCFC-141b in nearly all cleaning applications. Production and import of HCFC-141b will halt on 1/1/2003.
- B. No HCFCs (except HCFC-225) have been submitted for approval as substitutes for CFC-113 and TCA in non-aerosol solvent cleaning. Use of HCFCs in most solvent cleaning applications is prohibited by EPA. Not included are certain specific cleaning applications listed on page 2 of EPA's information sheet.
- C. EPA will likely list HCFC-141b as an unacceptable alternative to CFC's or TCA in adhesives, coatings and inks.
- D. No other HCFCs have been submitted for approval as substitute solvents in adhesives, coatings and inks. Use of HCFCs in most adhesives, coatings and inks is prohibited by EPA.

If reviewing an application for permit for a solvent cleaning operation, or a coating, adhesive or ink application operation, and the materials proposed for use contain an

Engineering Division Manual of Procedures

HCFC, the engineer should advise the applicant that such use may be prohibited by federal law. The engineer should provide the applicant with a copy of the attached fact sheet on prohibited HCFC uses from EPA. The advice to the applicant should be documented in the application file.

If the applicant declines to change the permit application to propose alternative materials or formulations that would not conflict with these prohibitions, the engineer should proceed with the evaluation and permitting pursuant to District rules, but notify the Chief of Engineering of the potential federal non-compliance.

12.8 Dry Cleaning Operations Using Silicone Siloxane

Dry cleaning operations employing Green Earth are exempt from permit requirements. Green Earth is the trademark name for Silicone Siloxane (CAS # 541-02-6) and is manufactured by GE Silicones. The MSDS indicates the material is greater than 95 percent decamethylcyclopentasiloxane and the solvent is odorless according to the physical and chemical properties listed.

In late 2002, the District's Chemical Engineering section reviewed technical data submitted by GE and determined that this solvent is an exempt compound in accordance with Rule 2 and not a volatile organic solvent as defined in Rule 11. Consequently, dry cleaning operations using Green Earth are not subject to permit requirements [per Rule 11(c)(11), 11(d)(18)(v), and 11(d)(18)(vii)] or Rule 67.2 or the Dry Cleaning ATCM.

13. Mechanical Section Procedures

13.1 Rule 50 Asphalt Plant Blue Smoke (March 22, 1985)

Only those blue smoke emissions in excess of 40 percent opacity that occur in the loading area of an asphalt plant will be aggregated against the pug mill or silo to determine compliance with Rule 50. When the truck or trailer leaves the loading area directly under the pug mill or silo, it becomes a separate stationary source. Emissions in excess of 20 percent opacity from trucks or trailers that have left the loading area are not to be aggregated against the loading area. In addition, the District will not require controls for trucks or trailers that have the potential to violate Rule 50 outside of the pug mill or silo loading area.

13.2 Allocation of Registration Fees under Rule 12.1

All fees associated with all registration applicants submitted under Rule 12.1 (fee schedules ending in "X" with a registration application fee) as specified in Rule 40 shall be allocated as follows:

- A. $\frac{3}{4}$ of the fee per application (unit) to Engineering for application processing.

Engineering Division Manual of Procedures

B. ¼ of the fee per application (unit) to Compliance for first year renewal costs.

13.3 Rule 12 Registration Application Processing (December 30, 1997)

Many Registration applications have been received under Rule 12. These are distinguished from Rule 12.1 Registration for portable equipment. Rule 12 does not consider portability nor does it provide involved emission limitations.

Fees provided with registration applications are very low. Therefore processing must be done expeditiously. We must not exceed the fees during processing.

The emissions from the equipment allowed to qualify for this rule were considered to be insignificant. Each application should include sufficient information to identify the registered equipment. The information should include the manufacture's name, model, serial number and capacity of the unit. Conditions in the BEC's reflect the operating requirements needed to minimize the emissions from the units. The BEC's for respective units are noted below. The only units that will require emissions calculations are the Stationary Internal Combustion Units located at Non-major Sources. These units must have been installed prior to April 5, 1983 and are limited to emit no more than 100 pounds in any day of the 5 criteria pollutants. These units are also limited to emit no more than no more than 3 pounds of lead in any day (as lead is not added to fuel any longer this should not be an issue.)

34W: Internal Combustion Emergency Standby Engines.
BEC 10929

34W: Stationary I/C Engines Installed Before April 5, 1983.
BEC 10931

Verify that the site specified for the engine is not a major source. If no emission data is provided with the application, the default factors in the engine work sheets should be used to calculate the emissions. Make a comment in your review if the unit might exceed emission standards. Indicate the number of operating hours at which the 100-pound threshold would be exceeded. Call Registrant to verify to verify that the operator has no intent to exceed 100 pounds per day. If the Registrant is vague about operating hours, print a copy of the P/O print out and write the number of operating hours at which the 100-pound threshold would be exceeded. Copy the form and send it to Compliance. Add the original to the file.

03W: Asphalt roofing Kettles and Asphalt Roofing Day Tankers.
BEC 10926

05W: Rock Drills
BEC 10927

Engineering Division Manual of Procedures

Rock Drills are usually engine driven. An application for a Rule 12.1 engine should be processed with the rock drill application.

34W: Auxiliary Aircraft Power Units Rated 200 Horsepower or less.
BEC 10930

20W: Aircraft Air Starts Units Rated 500 Horsepower or less.
BEC 10928

27W: Adhesive Material Application Station without cont. <55 gal/yr.
BEC ???

13.4 Applicability of Rules 52, 53, and 54. (May 12, 1999)

Because of the broadness of these rules, interpretations can be made to reach outside of the scope of the intended meaning of these rules. Therefore, some clarification must be made as to the true intent of these rules.

1) Rule 52 Particulate Matter

The rule's concentration standard prohibits a source from emitting more than 0.1 grains of particulate matter per dry standard cubic foot. Rule 52 applies to all sources of particulate matter except stationary internal combustion engines, equipment exempt from permits or registration and emission units' subject to rule 53.

Rule 52 does not specify an average time for determining compliance. Therefore when crafting permit conditions or performing engineering evaluations, the permit engineer should specify that the standard is instantaneous or choose an average time consistent with good air pollution control practice in consultation with your senior engineer.

2) Rule 53 Specific Air Contaminants - Rule 53 limits particulate emissions from combustion sources and emission of gaseous sulfur compounds from both combustion and non-combustion sources. The standard prohibits most combustion sources from emitting more than 0.1 grains of particulate matter per dry standard cubic foot corrected to 12% CO₂ or more than 0.05% by volume on a dry basis. Sources typically subject to Rule 53 are broilers (gas and liquid fired), gas-fired engines, combustion turbines and incinerators.

Exemptions Include:

- Stationary liquid fueled piston-type internal combustion engine.
- Natural gas, liquefied petroleum gas, or propane fired boilers with a maximum heat input of less than 50 million Btu per hour.

Engineering Division Manual of Procedures

- Liquefied fired boilers with a maximum heat input of less than 10 million Btu per hour.
 - Process heaters and steam generators.
 - All equipment that is subject to Rule 54 is exempt from Rule 53 Subsections d.2 and d.3.
- 3) Rule 54 Dust and Fumes - Rule 54 sets standards for particulate emissions based on weight of materials introduced into a process per hour. The standard varies depending on the hourly rate at which the material is introduced into the process. This rule was developed to regulate very large-scale sand and gravel operations that had very high emissions despite their ability to comply with the Rule 52 particulate concentration limit.
- Exemptions include:
- Exclusively combustion processes that are fueled with liquid or gaseous fuel.
 - Combustion processes that generate only light, heat, team or power.
 - All internal combustion engines, turbines, boilers, process heaters and steam generators.

13.5 Emergency Generators, Horsepower Used for Exemption (July 1987)

In the case of the Doubletree Hotel the following legal decision was issued. An emergency generator with less than 500 bhp existed on site and an additional cogeneration unit of less than 500 bhp was proposed with the emergency generator operating concurrently with the cogeneration unit for maintenance purposes and the remainder of the time, the emergency generator would operate only when the cogeneration unit was down.

A legal decision stated that the District will consider the operating horsepower, and not the dormant horsepower when determining if an exemption from an A/C or P/O applies, even when there is concurrent limited operation during maintenance operations. The source will provide the District a written commitment that there will be no concurrent operation except for maintenance purposes not to exceed "X" hours per year. The source will be required to keep records of emergency generator operation and make them available to the District upon request.

13.6 Mineral Industry Emission Calculations Procedure (April 9, 1996)

As a result of discussions with the mineral industry the District Management has agreed to implement emission factors as described herein. All District Staff shall implement these approaches immediately. Before any variation to these methods are implemented the Chief of the Engineering Division must approve them in advance. It is understood that there will be a difference to inputs when determining potential to emit versus actual emission, however this should not require variation from the methods describe herein.

Engineering Division Manual of Procedures

These methods do not address certain categories of mineral industry operations. Until guidance is provided, such categories will continue to be calculated as before. It is essential however that all District staff use consistent methods throughout the District.

A. Conveyor Transfer Points

EPA AP-42 (Fifth Edition) PM₁₀ emission factors for conveyor transfer points (Table 11. -. -) will be used as follows.

1) The appropriate factors are as follows.

DRY: 1.4×10^{-3} Lb. of PM₁₀ per ton of material transferred

WET: 4.8×10^{-5} Lb. of PM₁₀ per ton of material transferred

a. When aggregate streams are composed of 70 percent (%) or more by weight of aggregate larger in size than a number 4 NIESH (typically all except crushed fines):

- i) For material with less than 1.5 percent (%) moisture the "DRY" factor above will be used.
- ii) For material with 1.5 percent (%) moisture or more the "WET" factor above will be used.
- iii) These factors are to be used according to the following criteria when considering specific site or equipment operating conditions.

b. When aggregate streams are composed of 70 percent (%) or more by weight aggregates that are smaller in size than a number 4 MESH (typically pit fines, crushed fines, rock dust, and recrushing circuits):

- i) For material with less than 3.0 percent (%) moisture the "DRY" factor above will be used.
- ii) For material with 3.0 percent (%) moisture or more the "WET" factor above will be used.

2) Control Efficiencies

It will become necessary to use control efficiencies when utilizing the "DRY" factor above. These are to be used in the following manner.

- a. When transfer point are vented to central fabric filter collectors the collection efficiency will be assumed at 95.0 percent (%) when vented to a centralized collector.

Engineering Division Manual of Procedures

- b. When transfer points are controlled by means of insertable fabric filter collectors, a control efficiency of 97.5 percent (%) will be assumed.
 - i) Fogging of an enclosed transfer point, will be assumed to have a control efficiency of 75 percent (%).
 - ii) Control of a transfer point with water containing surfactant used in accordance with the surfactant manufacturer's specifications will be assumed to have a control efficiency of 50 percent
 - iii) When transfer points involve reclaim from a tunnel or an enclosed chute, 50 percent (%) control will be assumed if the transfer point is "DRY"; no additional control will be assumed for "WET" transfer points.

The District may adjust the above efficiencies based upon a visual inspection and or testing during the Permit to Operate phase of permit processing.

3) Use of Emission Factors in Authority to Construct Evaluations

In order to qualify for this emissions calculation approach, an applicant must provide the District with a list of transfer points, including hourly throughputs, on a process flow sheet. Based on the design and planned operation of the plant, the applicant should designate these transfer points as "DRY" or "WET", and specify any additional control techniques which will be employed.

Consistent with the design and operation of similar transfer points at existing facilities, the District will review the applicant's "WET" and "DRY" designations and make an independent determination of the factors to be used in the Authority to Construct evaluation. The APCD staff will have the final decision regarding emission factors used in the A/C evaluation.

Conditions limiting hourly, daily and yearly production can be placed on the A/C to implement the District's assumptions on transfer point emissions. Language can be incorporated requiring, or allowing testing to verify these assumptions.

4) Use of Emission Factors in Permit to Operate Evaluations

Once construction at a facility is completed and has undergone shakedown testing, the moisture content of each transfer point can actually be measured, and the appropriate emission factor (and associated control efficiency, if any) will be assigned.

Engineering Division Manual of Procedures

The District may impose conditions on the Permit to Operate in order to assure that actual site emissions match the assumptions in the permit evaluation. These conditions may include aggregate size, moisture content, and opacity limitations as stated below if this facility was not yet in existence on the date of this memorandum, or if the operation has been modified and the APCD feels these are appropriate.

Opacity Condition:

All conveyor to conveyor transfer points which qualify for use of the "WET" emission factor shall have unique and easily readable identification numbers posted beside them for identification purposes. Except for non-repeatable momentary readings, opacity at these conveyor to conveyor transfer points shall not exceed 10 percent (%) at any time.

5) Use of Factors for Existing Facilities

For existing facilities, it is expected that sufficient data already exists from previous testing to characterize the emissions from transfer points.

In the event existing data is judged inadequate by the District, the moisture content of each transfer point at a site will be determined on a one-time basis, and the appropriate emission factor and control efficiency, if any, will be assigned.

After this one-time determination, no further testing will be performed by the facility, but the District may elect to conduct testing to verify that the moisture contents of various transfer points have not changed appreciably.

The District may add conditions for new or modified facilities requiring moisture content limits as assumed in the emission calculations.

6) Water Washed Aggregates

Transfer points when handling aggregates which have been washed, either in a log washer, over a wet screen, or by similar devices, will have an emission factor of 0.0 (ZERO) Lbs./ton assigned, for as long as the aggregates retain their visible moisture during handling, stockpiling or conveying.

7) Aggregate Streams with greater than 5.0 percent (%) moisture

Transfer points involving aggregate streams having a moisture content of 5.0 percent (%) or greater will be assigned an emission factor of 0.0 (ZERO) Lbs./ton.

Engineering Division Manual of Procedures

B. Crushing Operations

EPA AP-42 (Fifth Edition) PM₁₀ emission factors for crushing emissions will be used as follows.

- 1) The appropriate Rock Crushing factors are as follows:

Primary Crushing	7.0×10^{-4}	Lb. of PM ₁₀ per ton of material processed
Process Crushing (Dry)	2.4×10^{-3}	Lb. of PM ₁₀ per ton of material processed
Process Crushing (Wet)	5.9×10^{-4}	Lb. of PM ₁₀ per ton of material processed
Fines Crushing (Dry)	1.5×10^{-2}	Lb. of PM ₁₀ per ton of material processed
Fines Crushing (Wet)	2.0×10^{-3}	Lb. of PM ₁₀ per ton of material processed

These factors are to be used according to the following criteria when considering specific site or equipment operating conditions.

- a. For feed streams having +4 inch material, (principally jaw and gyratory crushers) use the Primary Crushing factor.
- b. For feed streams whose largest aggregate is in the range of -4 inch material, (most standard and shorthread cones, some gyradisc and impact crushers) use the Process Crushing factors as follows:
 - i) For material fed to the crusher with less than 1.5 percent (%) moisture, the "Dry" factor will be used.
 - ii) For material fed to the crusher with 1.5 percent (%) moisture or greater, the "Wet" factor will be used.
- c. For a crusher whose aggregate feed stream is exclusively an aggregate below 1/2 inch material, or for a crusher whose product is composed of 30 percent (%) or more by weight aggregates that are smaller in sized than a number four (4) MESH, use the Fines Crushing Factors as follows:
 - i) For material fed to the crusher with less than 3.0 percent (%) moisture, the "Dry" factor will be used.
 - ii) For material fed to the crusher with 3.0 percent (%) moisture or greater, the "Wet" factor will be used.

- 2) Control Efficiencies

It will be necessary to utilize control efficiencies when utilizing the "Dry" factors above. These are to be used in the following manner:

Engineering Division Manual of Procedures

Type of Air Pollution Control	Default Control Efficiencies (Percent)	Emission Multiplier
Water Spray	50	0.50
Water Spray w/ Surfactant	75	0.25

The only additional requirement for assuming the above listed default control efficiencies will be a pen-nit condition requiring the use of the specified control technique.

3) Capture Efficiencies

It will be necessary to utilize control efficiencies when utilizing the "Dry" factors above. These are to be used in the following manner:

Type of Air Pollution Control	Default Capture Efficiencies (Percent)	Emission Multiplier
Venting to Central Fabric Filter	95	0.05
Venting to Insertable Fabric Filter	97.5	0.025

The only additional permit requirement for assuming the above listed default capture efficiencies will be a pen-nit condition requiring the use of the specified control technique.

4) Higher Efficiencies

Control or Capture efficiencies higher than the default values listed above may be utilized if an additional condition is accepted listing the specific performance of the control technique.

5) Use of Emissions Factors in Authority to Construct Evaluations

In order to qualify for this emission calculation approach, an applicant must provide the District with a list of crushing systems, including hourly throughputs, on a process flow sheet. Based on the design and planned operation of the plant, the applicant must designate these crushing systems as "Dry" or "Wet", and specify any additional control techniques which will be employed.

Consistent with the design and operation of similar crushing systems at existing facilities, the District will review the applicant's "Wet" and "Dry" designations and make an independent determination of the factors to be used in the Authority to Construct evaluation. The APCD staff will have the final decision regarding emission factors used in the A/C evaluation.

Engineering Division Manual of Procedures

Conditions limiting hourly, daily and yearly production can be placed on the A/C to implement the District's assumptions on emissions from crushing systems. Language can be incorporated requiring, or allowing, testing to verify these assumptions.

6) Use of Factors in Permit to Operate Evaluations

Once construction at a facility is completed and the facility has undergone shakedown testing, the moisture content associated with each crushing system can actually be measured, and the appropriate emission factor with the associate control efficiency, if any, will be assigned.

The District may impose additional conditions on the Permit to Operate in order to assure that actual site emissions match the assumptions in the permit evaluation. These additional conditions may include aggregate size, moisture content and opacity limitations, as stated below, if this facility was not yet in existence on the date of this memorandum, or if the operation has been modified, and the APCD feels these are appropriate.

Opacity Condition:

All crushing systems which qualify for use of the "Wet" emission factor shall have unique and easily readable identification numbers posted beside them for identification purposes. Except for non-repeatable momentary readings, opacity at these crushing systems shall not exceed 10 percent (%) at any time.

7) Use of Factors for Existing Facilities

For existing facilities, it is expected that sufficient data already exists from previous testing to characterize the emissions from most crushing systems. Occasionally, data may not yet exist.

In the event existing data is judged inadequate by the District, the moisture content associated with material being fed to each crushing system at a site will be determined on a one-time basis, and the appropriate emission factor, control efficiency and/or capture efficiency, if any, will be assigned.

After this one-time determination, no further testing will be performed by the facility, but the District may elect to conduct testing to verify that the moisture contents of the various crushing systems have not changed to any significant degree.

The District may add conditions for new or modified facilities requiring moisture content limits as assumed in the emission calculations.

8) Facilities with Controls on "Wet" Crushing Systems

Engineering Division Manual of Procedures

Facilities which have controls installed on crushing systems which qualify as "Wet" systems shall be evaluated as in Section 2. The District may adjust the control efficiencies based upon a visual inspection and/or testing during a site visit.

9) Emissions Calculations Associated with Exhaust of Fabric Filter Control Systems

If a fabric filter control system is used to control emissions from crushing and/or transfer points in addition to the fugitive process emissions calculated by using emission factors and capture efficiencies, stack emissions from the exhaust of the fabric filter control system must also be calculated.

In the absence of any source test data, a PM₁₀ particulate concentration of 0.008 grains per dry standard cubic foot will be assumed. The volumetric flow rate of the stack (DSCFM) will be used in conjunction with the concentration to calculate hourly emissions. A PM₁₀ emission factor per ton of rock can then be determined by dividing the maximum hourly production rate of the plant into the calculated hourly emission rate.

If stack concentration data for total suspended particulates is available from Method 5 testing a multiplier of 0.50 will be used to estimate the PM₁₀ emissions for use in calculating a stack emission factor.

This stack emission factor should then be used to determine hourly, daily and annual emissions.

C. Screening Operations

EPA AP-42 (Fifth Edition) PM₁₀ emission factors for screening emissions will be used as follows.

1) The appropriate Rock Screening factors are as-follows:

Process Screening (Dry)	1.5×10^{-2}	Lb. Of PM ₁₀ per ton of material processed
Process Screening (Wet)	8.4×10^{-4}	Lb. Of PM ₁₀ per ton of material processed
Fines Screening (Dry)	7.1×10^{-2}	Lb. Of PM ₁₀ per ton of material processed
Fines Screening (Wet)	2.1×10^{-3}	Lb. Of PM ₁₀ per ton of material processed

These factors are to be used according to the following criteria when considering specific site or equipment operating conditions.

- a. When the aggregate stream being fed to a screen is composed of 70 percent (%) or more by weight of aggregates that are larger in size than a number four (4) MESH, use the Process Screening factors as follows:

Engineering Division Manual of Procedures

- i) For feed material with less than 1.5 percent (%) moisture, the "Dry" factor will be used.
- ii) For feed material with 1.5 percent (%) moisture or greater, the "Wet" factor will be used.
- b. When an aggregate stream being fed to a screen is composed of 30 percent (%) or more by weight aggregates that are smaller in sized than a number four (4) MESH, use the Fines Screening factors as follows:
 - i) For feed material with less than 3.0 percent (%) moisture, the "Dry" factor will be used.
 - ii) For feed material with 3.0 percent (%) moisture or greater, the "Wet" factor will be used.

2) Control Efficiencies

It will be necessary to utilize control efficiencies when utilizing the "Dry" factors above. These are to be used in the following manner:

	Default Control Efficiencies	
Control Technique	Percent	Emission Multiplier
Covered Screen	50	0.50
Covered Screen with Water Added	75	0.25
Covered Screen with Surfactant Added	90	0.10

The only additional permit requirement for assuming the above listed default control efficiencies will be a permit condition requiring the use of the specified control technique.

3) Capture Efficiencies

It will be necessary to utilize control efficiencies when utilizing the "Dry" factors above. These are to be used in the following manner:

Default Capture Efficiencies Control Technology	(Percent)	Emission Multiplier
Covered Screen, Vented to Central Fabric Filter	95	0.05
Covered Screen, Vented to Insertable Fabric Filter	97.5	0.025

Engineering Division Manual of Procedures

The only additional permit requirement for assuming the above listed default capture efficiencies will be a permit condition requiring the use of the specified control technology.

4) Higher Efficiencies

Control or Capture efficiencies higher than the default values listed above may be utilized if an additional condition is accepted listing the specific performance of the control technique.

5) Use of Emissions Factors in A/C Evaluations

In order to qualify for this emission calculation approach, an applicant must provide the District with a list of screening systems, including hourly throughputs, on a process flow sheet. Based on the design and planned operation of the plant, the applicant must designate these screening systems as "Dry" or "Wet", and specify any additional control techniques which will be employed.

Consistent with the design and operation of similar screening systems at existing facilities, the District will review the applicant's "Wet" and "Dry" designations and make an independent determination of the factors to be used in the Authority to Construct evaluation. The APCD staff will have the final decision regarding emission factors used in the A/C evaluation.

Conditions limiting hourly, daily and yearly production can be placed on the A/C to implement the District's assumptions on emissions from screening systems. Language can be incorporated requiring, or allowing, testing to verify these assumptions.

6) Use of Factors in Permit to Operate Evaluations

Once construction at a facility is completed and the facility has undergone shakedown testing, the moisture content associated with each screening system can actually be measured, and the appropriate emission factor with the associate control efficiency, if any, will be assigned.

The District may impose additional conditions on the Permit to Operate in order to assure that actual site emissions match the assumptions in the permit evaluation. These additional conditions may include aggregate size, moisture content and opacity limitations, as stated below, if this facility was not yet in existence on the date of this memorandum, or if the operation has been modified, and the APCD feels these are appropriate.

Opacity Condition:

Engineering Division Manual of Procedures

All screening systems which qualify for use of the "Wet" emission factor shall have unique and easily readable identification numbers posted beside them for identification purposes. Except for non-repeatable momentary readings, opacity at these screening systems shall not exceed 10 percent (%) at any time.

7) Use of Factors for Existing Facilities

For existing facilities, it is expected that sufficient data already exists from previous testing to characterize the emissions from most screening systems. Occasionally, data may not yet exist.

In the event existing data is judged inadequate by the District, the moisture content associated with material being fed to each screening system at a site will be determined on a one-time basis, and the appropriate emission factor and control efficiency, if any, will be assigned.

After this one-time determination, no further testing will be performed by the facility, but the District may elect to conduct testing to verify that the moisture contents of the various screening systems have not changed to any significant degree.

The District may add conditions for new or modified facilities requiring moisture content limits as assumed in the emission calculations.

8) Water Washed Aggregates

Screening systems when handling aggregates which are being washed with water will have an emission factor of 0.0 (ZERO) Lbs./Ton assigned.

9) Aggregate Streams with Greater than 5.0 Percent (%) Moisture

When aggregates having a moisture content of 5.0 percent (%) or greater are being fed to a screening system, an emission factor of 0.0 (ZERO) Lbs./Ton will be assigned.

10) Facilities with Controls on "Wet" Screening Systems

Facilities which have controls installed on screening systems which qualify as "Wet" systems shall be evaluated as in Section 2. The District may adjust the control efficiencies based upon a visual inspection and or testing during a site visit.

11) Emissions Calculations Associated with Exhaust of Fabric Filter Control Systems.

Engineering Division Manual of Procedures

If a fabric filter control system is used to control emissions from screening and/or transfer points in addition to the fugitive process emissions calculated by using emission factors and capture efficiencies, stack emissions from the exhaust of the fabric filter control system must also be calculated.

In the absence of any source test data, a PM₁₀ particulate concentration of 0.008 grains per dry standard cubic foot will be assumed. The volumetric flow rate of the stack (DSCFM) will be used in conjunction with the concentration to calculate hourly emissions. A PM₁₀ emission factor per ton of rock can then be determined by dividing the maximum hourly production rate of the plant into the calculated hourly emission rate.

If stack concentration data for total suspended particulates is available from Method 5 testing a multiplier of 0.50 will be used to estimate the PM₁₀ emissions for use in calculating a stack emission factor.

This stack emission factor should then be used to determine hourly, daily and annual emissions.

D. Paved and Unpaved Haul Roads, Emissions and Control Efficiencies

EPA AP-42 (Fifth Edition) emission factor relationships will be used as follows:

1) Predictive Equation and Samples Required

The District has already implemented the revised Paved Haul Road Factor in spreadsheet form. These spreadsheets must be reviewed to assure accuracy.

It is agreed that the following conversion factor will be used in all paved haul road calculations.

$$1 \text{ ounce per yard}^2 \quad | = 33.9 \text{ grams per meter}^2$$

The District agrees that existing test procedures for determining silt content of paved roads can be easily modified by adjusting the four, 2 square yard sub samples to four, 2 square meter samples, and weighing the -200 MESH fraction of the sample, as in the current procedure.

The number of samples required at a site in order to be representative may vary from 1 to 7, with 5 samples (each consisting of four, 2 square meter sub samples) being the preferred number. An arithmetic average of the silt loading of each sample will continue to determine the silt loading for the site.

The "default" value for sites where no silt loading data exists (e.g., in Authority to Construct evaluations) should remain approximately the same as the old value of 0.40 ounces per yard², which corresponds to a value of 13.6 grams per meter².

Engineering Division Manual of Procedures

2) Control Efficiencies - Paved and Unpaved Haul Roads

Control efficiencies proposed by the mineral industry are troublesome in that there is no evidence to provide as a basis for their use. Most controls involve cleaning of the road surface. This directly impacts the silt loading (sL). The equation has been designed to take these controls into account.

EPA indicates in AP-42 (Fifth Edition) at page 13.2.1-12 the following:

"Because available controls will affect the sL (silt loading), controlled emission factors may be obtained by substituting controlled loading values into the equation."

To add a control efficiency in addition to the silt loading reduction would be to double count the reduction. This will likely lead to a significant under statement of emission and is contrary to the purposes of the given equation. This would be true for any form of sweeping flooding or any washing of roads.

It is, however, appropriate to assign control efficiency to control measures that do not impact the silt loading such as simple watering where the road surface is maintained in a wet state. Therefore control efficiency will be assigned according to the following:

- a. An 80 percent (%) control efficiency will be assigned as default for all plants whose current watering practices keep emissions from exceeding a 20 percent (%) opacity for more than three minutes in any consecutive 60 minute period.
- b. A 90 percent (%) control efficiency will be assigned for any plant willing to accept a permit condition requiring watering of paved and unpaved haul roads at 4 hour intervals, unless the road surface appears visibly wet. In addition, as a condition of the permit to operate, such watering must, except for non-repeatable momentary readings, prevent visible emissions eight feet above the road surface from exceeding 20 percent (%) opacity.
- c. A 95 percent (%) control efficiency will be assigned for any plant willing to accept a permit condition requiring watering of paved and unpaved haul roads at 2 hour intervals, unless the road surface appears visibly wet. In addition, as a condition of the permit to operate, such watering must, except for non-repeatable momentary readings, prevent visible emissions eight feet above the road surface from exceeding 10 percent (%) opacity.

Engineering Division Manual of Procedures

- d. Site specific control efficiency will be allowed in excess of the 80 percent default based on negotiations with the District and the source accepting enforceable conditions acceptable to the District.

3) Treatment of Existing Facilities

Existing facilities will be allowed, if they desire, a one time opportunity to trade in their existing wet sweeping or flooding conditions for other time intervals, so long as a redetermination of the silt loading of the paved haul road is made based on the new wet sweeping schedule and such change is not inconsistent with any required Best Available Control Technology (BACT).

Existing facilities without wet sweeping conditions would be allowed to establish, if they desire, a wet sweeping or flooding permit condition, and then reestablish a new silt loading based on that sweeping schedule, provided such change is not inconsistent with BACT requirements applicable when the Permit to Operate was issued.

It is the intent that updates would be completed during the month of April 1996, such that the emissions calculations from haul roads could be modified in time for the 1993 criteria and toxics inventory updates.

4) Treatment of New Facilities

New facilities will be evaluated during the Authority to Construct evaluation by using a default value of 13.6 grams per meter² for silt loading, 15 percent (%) for silt content, and a control efficiency based on either the 80 percent (%) default value, or an additional efficiency based on the watering conditions outlined above. This is not intended to be inconsistent with any BACT requirements or considerations.

Once a facility is constructed and operating, it will undergo testing for the silt loading of the paved haul roads and the silt content of the unpaved haul roads, and these emissions calculations will be finalized based on the watering conditions, if any, the facility proposes for the Permit to Operate.

5) Air Toxics

Rock Producers will continue to differential between paved haul road and unpaved haul road emissions for both criteria and air toxic calculations.

Separate speciation profiles will continue to be developed for trace metals and crystalline silica present in the PM₁₀ fraction of material taken from unpaved and paved haul roads.

6) Vehicle Weight and Truck Wheels

Engineering Division Manual of Procedures

Emission calculations should continue to be performed based on the type of haul vehicle as shown below.

Default values for vehicle weight and truck wheels for three typical haul truck configurations for asphalt and rock plants are shown below:

Empty Weight (tons)	Loaded Weight (tons)	Net Haul Weight (tons)	Average Weight (tons)	Wheels (number)
15	40	25	27.5	18
11	25	14	18	10
8	15	7	11.5	6

The population of 6, 10 and 18 wheel trucks will be established on a site specific basis; based on the facilities best judgment with either site historical data or similar facilities currently in operation in the County.

The weight of transit-mix concrete trucks may differ significantly from site to site. Therefore, no general guidance for concrete batch plans is given. -The Rock Producers will work with the District to develop default values for ready mix trucks at some point in the future.

Also, at some time in the future it would be helpful if a relationship between silt content and visible emissions were developed cooperatively with the Rock Producers.

13.7 Mineral Industry Emission Calculations Procedures (November 5, 1999)

HOT MIX ASPHALT PLANTS
(SO_x, ROG and TOG Emissions)

CONCRETE BATCH PLANTS – PM₁₀ Emissions
(Weigh hopper loading)
(Mixer loading, central mix)
(Truck loading, truck mix)

In response to recent requests from representatives of the mineral industry, the District has reconsidered some of the emission estimation methodologies applicable to the above source categories. As a result, there is consensus that the following emission estimating methodologies shall be followed for permitting, emissions inventory (criteria and toxics) and any other emission estimating efforts:

A. HOT MIX ASPHALT PLANTS [SO_x, ROG and TOG Emissions]

Engineering Division Manual of Procedures

- 1) SO_x emissions will be based on the sulfur content and amount of the fuels used as follows:
 - Natural gas-fired dryers:

$$\text{SO}_x = 0.6 \times S^* \text{ lb/million scf fuel burned where } S^* \text{ is the ratio of gas fuel sulfur content (gr/MMscf) to a standard value of 2000 gr/MMscf. (ref. AP-42, Table 1.4-2, including footnote d)}$$
 - Oil-fired dryers:

$$\text{SO}_x = 142 \times S \text{ lb/1000 gallons liquid fuel burned, where } S \text{ is wt.\% sulfur in fuel (generally 0.05\%). (ref. AP-42, Table 1.3-1)}$$
- 2) ROG emissions will be based on the TOC emission factor found in Tables 11.17 and 11.1-8 of AP-42 (1/95) minus the acetone content listed in the speciated organics emissions data in Tables 11.1-9 and 11.1-10. TOG emissions will be based on the TOC emission factor in Tables 11.1-7 and 11.1-8 plus the methane content listed in the speciated organics emissions data in Tables 11.1-9 and 11.1-10. The resulting emission factors are:

BATCH MIX PLANTS

Natural gas-fired dryers:

ROG = 0.011 lbs/ton

TOG = 0.029 lbs/ton

Oil-fired dryers:

ROG = 0.046 lbs/ton

TOG = 0.050 lbs/ton

DRUM MIX PLANTS

Natural gas-fired dryers:

ROG = 0.051 lbs/ton

TOG = 0.073 lbs/ton

Oil-fired dryers:

ROG = 0.068 lbs/ton

TOG = 0.089 lbs/ton

- B. CONCRETE BATCH PLANTS [PM₁₀ Emissions from Weigh hopper loading, Mixer loading (central mix), Truck loading (truck mix)]

The emission factors in Table 11.12-2 (attached), AP-42, Fifth Edition will be used for estimating emissions. Specifically, the PM emission factors for weigh hopper loading, mixer loading (central mix) and truck loading (truck mix) will be used for those operations where there is no further control of those emission points beyond

Engineering Division Manual of Procedures

Shrouding. Shrouding constitutes the level of control used at the sources tested in the past to develop these emission factors. PM-10 will be calculated as 92% of the PM emissions. This is based on an ARB recommended value. If a central fabric filter system is used, an additional capture efficiency shall be applied to the affected emission points as follows:

Central fabric filter: 95% capture

In addition, a PM₁₀ emission rate of 0.008 grains per dry standard cubic foot of exhaust from the baghouse will be applied in the absence of site-specific or otherwise representative source test data.

13.8 Clarifications to Rule 69.2 Requirements (November 6, 2000)

Several issues have arisen regarding implementation of Rule 69.2 requirements. After discussions with the NO_x Rules Implementation Work Group, the following clarifications have been developed:

A. Issue #1 - When does Rule 69.2(e)(1) require fuel meters?

1) Fuel meters are required by Rule 69.2 (e)(1) for:

- a. Gas only-fired boilers exempt from NO_x limits per Rule 69.2(d)(2).
- b. Liquid only-fired boilers exempt from NO_x limits per Rule 69.2(d)(2).
- c. Dual-fuel boilers subject to the NO_x emission limits of 69.2(d)(1). Meters are required for both fuels. An exception to having a liquid fuel meter applies when liquid fuel is only fired as a back-up fuel under 69.2(b)(2) circumstances (i.e. for testing and during natural gas curtailments and emergencies).
- d. Dual-fuel boilers that are exempt from the NO_x emission limits per 69.2(d)(2) are required to have meters for both gas and liquid fuels, except where a liquid fuel inventory and fuel purchase system is proposed to track fuel use to a specific boiler and records necessary to assure compliance are kept as approved by the District permit engineer. A further exception to the requirement to have a liquid fuel meter applies when liquid fuel is only fired as a back-up fuel under 69.2(b)(2) circumstances (i.e. for testing and during natural gas curtailments and emergencies).

2) Fuel meters are **not** required by Rule 69.2(e)(1) for:

- a. Gas-only and liquid-only fired boilers subject to the NO_x emission limits of 69.2(d)(1).

Engineering Division Manual of Procedures

- b. Gas-fired boilers with liquid-firing backup capability subject to the NO_x emission limits of 69.2(d)(1) where liquid firing is limited to 69.2(b)(2) circumstances (i.e. for testing and during natural gas curtailments and emergencies). The permit conditions must limit liquid fuel use to (b)(2) circumstances and require the records specified in 69.2(e)(4) and (e)(5).
- c. Liquid fuel meters for dual fuel-fired and liquid-only fired boilers exempt from the NO_x limits per 69.2(d)(2) where a liquid fuel inventory and fuel purchase system is approved by the District to track fuel use to a specific boiler and the records necessary to assure compliance are kept as approved. The permit engineer must review the proposed inventory system and the records to be kept to ensure the records are able to show the boiler complies with the applicable annual therm or capacity factor limit.

A single fuel meter (or an approved alternative system of tracking and recording fuel inventory and purchases) may serve more than one boiler provided the aggregate usage of all boilers served by that meter (or system) is less than the single boiler usage limit (220,000 therms) in the rule. Permit conditions are to be imposed on all aggregated boilers to enforce this. A single meter cannot be used to serve more than one boiler if any of the boilers is exempt from NO_x emission limits based on an annual capacity factor of less than 10%, since the capacity factor limit applies to each boiler and cannot be averaged over multiple boilers.

Fuel meters should be accurate to within +/- 1% at the time of installation. This requirement should be the same as the SDG&E requirement for meter accuracy. Therefore, an SDG&E installed meter will be considered sufficient to satisfy this accuracy requirement unless found otherwise.

B. Issue #2 - When does Rule 69.2(e)(2) require continuous monitors?

Rule 69.2(e)(2) requires that each boiler subject to the NO_x emission limits of 69.2(d)(1) be equipped with continuous (parametric) monitors to allow for instantaneous monitoring of the operational characteristics of the boiler and of the flue-gas NO_x reduction system "as applicable".

However, most boilers subject to the NO_x emission limits are complying through use of low NO_x burners with flue gas recirculation (FGR). Often, the rate of recirculation is fixed (either mechanically or within the boiler's automatic controls) based on fuel flow rate and there is little, if any, benefit to "continuously monitoring" the FGR rate or stack O₂ content. Moreover, boilers equipped with low-NO_x burners and FGR that initially comply with the rule's NO_x limits have demonstrated on-going compliance in their annual source tests.

Engineering Division Manual of Procedures

Accordingly, no additional continuous parametric monitoring is required under Rule 69.2 for boilers that are complying with use of low-NO_x burners and FGR where the FGR rate is pre-set to follow fuel-firing rate. The permit should describe the type of FGR rate control and require the operator record any repairs or modifications made to the FGR controls or burners. Should either source testing or spot testing with a portable analyzer demonstrate that a boiler is not meeting the applicable NO_x emission limits, additional parametric monitoring may be required.

For boilers that comply through the use of other NO_x controls such as SCR or SCONO_x, continuous parametric monitoring is necessary to ensure on-going compliance. In deciding upon appropriate parametric monitoring, the project engineer must consider that the rule requires compliance with the NO_x emission limits continuously (24x7x365). Monitoring requirements should be developed by the project engineer on a case-by-case basis for the NO_x controls used, with senior engineer review and Compliance Division input. Permit conditions should specify that proper calibration and maintenance procedures for the monitors will be followed and require the operator to record calibration, maintenance, repair and replacement activities related to the monitors. If the boiler is located at a major stationary source required to have a Title V permit, monitoring requirements should be reviewed with the Title V senior engineer assigned that source.

- C. Issue #3 - When does Rule 69.2(e)(3) require a record of the higher heating value (HHV) of each fuel.

Rule 69.2(e)(3) requires the operator of a boiler exempt from the NO_x emission limits per 69.2(d)(2) monitor and record the higher heating value and annual usage of each fuel. This was to ensure compliance with the annual therm (or capacity factor) exemption limit of 69.2(d)(2) when annual fuel use is limited by permit conditions.

Where a boiler is fueled primarily on utility supplied natural gas, monitoring and recording of the gas HHV is generally unnecessary. Therefore, boiler operators will not be required to monitor and record the higher heating value under Rule 69.2 when all the following apply:

- 1) Utility supplied natural gas is the primary fuel and liquid fuel is only used as a backup under 69.2(b)(2) circumstances.
- 2) A serving utility natural gas meter is used to determine the gas usage rate.
- 3) A permit condition specifies the allowable annual (calendar year) usage of natural gas in cubic feet. A standard higher heating value of 1,020 BTU per cubic foot of natural gas is to be used to calculate allowable gas usage under Rule 69.2(d)(2). [Source of HHV: AP-42, Table 1.4-1 (2/98 revision)].

Engineering Division Manual of Procedures

When boilers are permitted to burn liquid fuel for more than backup, the higher heating value of the liquid fuel must be monitored and recorded. Information on the HHV from the fuel supplier or as determined by one of the test methods specified in Rule 69.2(f)(2) is acceptable. The permit should contain a condition requiring the operator to maintain a record of the HHV of liquid fuels based on fuel supplier or test information. The requirement to maintain and record the HHV of liquid fuel does not apply if the liquid fuel is only used as a backup fuel consistent with 69.2(b)(2).

The above does not apply when the fuel HHV is needed for purposes other than Rule 69.2 (e.g. to enforce an NSR requirement).

- D. Issue #4 - What tuning procedure options are available to Rule 69.2(d)(2)(iii) exempt boilers?

Sites have three choices to fulfill the tuning requirement of Rule 69.2(d)(2)(iii):

- 1) Rule 69.2(j) Tuning Procedure
- 2) SCAQMD Rule 1146 Attachment 1(B) Equipment Tuning Procedure for Natural Draft-Fired Boilers, Steam Generators and Process Heaters. Note that SCAQMD's tuning procedure for forced-draft and natural draft-fired boilers allows the use of a "different" tuning procedure provided a copy of the procedure is kept with the unit records for three years and is made available to District personnel on request.
- 3) An alternative tuning procedure recommended by the boiler manufacturer or by a licensed boiler servicing company. In this case, the procedure does not require prior District approval at this time, but must be provided to the District upon request.

The permit shall contain a condition requiring annual tuning be performed and specifying that any of the above procedures may be followed. The permit shall also contain a condition requiring that records of the annual boiler tuning be maintained in accordance with Rule 69.2(e) and specifying that if a manufacturer's or boiler servicing company's alternative tuning procedure is used, the procedure shall be identified on the tuning record and a copy of the procedure shall be provided to the District upon request.

Table 1

Summary of Rule 69.2(e)(1) Requirements to Install Fuel Meters:

	Gas Only	Liquid Only	Gas w/ Liquid Backup	Dual-Fired Gas or Liquid
Boilers – 5 MM Btu/hr			Gas – No	Gas – Yes

Engineering Division Manual of Procedures

Fuel use – 220,000 therms Subject to Rule 69.2(d)(1)	No	No	Liquid – No (b)	Liquid – Yes
Boilers – 50 MM Btu/hr Fuel use – <220,000 therms Subject to Rule 69.2(d)(2)	Yes (a)	Yes	Gas – Yes Liquid – No (b)	Gas – Yes Liquid – No (c)
Boilers – >50 MM Btu/hr Fuel use <10% capacity Subject to Rule 69.2(d)(2)	Yes	Yes	Gas – Yes Liquid – No (b)	Gas – Yes Liquid – No (c)

- (a) One meter can be used to determine compliance for multiple boilers if the fuel use for all equipment served by that meter is less than 220,000 therms.
- (b) Boilers with liquid fuel back-up complying with Rule 69.2(b)(2)(i) and (ii) for emergencies, during gas curtailment or for testing to maintain the fuel oil back-up system must have records of **hours** of fuel oil firing in accordance with Rule 69.2(e)(4) and (e)(5) but are not required to install liquid fuel meters.
- (c) Dual fuel fired boilers complying with Rule 69.2(d)(2) may have fuel tank inventory and fuel purchase records, as approved by the District, in lieu of a liquid fuel meter.

13.9 Permitting of New Emergency Backup Generators (Mike Lake – July 6, 2001, Revised December 2010)

Due to concerns with the possibility of rolling electrical blackouts, facilities submit many applications for new emergency backup engines/generators (referred to as BUG's). The applications are running approximately 90% diesel-fueled, 10% natural gas-fueled. It is common for applicants to request authority to install generators very quickly. In some cases, applicants may have already purchased generators.

There are several issues to be addressed in evaluating and approving these applications:

- Rule 69.4.1 – New and replacement emergency backup engines are subject to the NOx limits of this rule.
- Rule 20.2-BACT (Criteria Pollutants) –BACT is required when NOx, SOx or PM10₁₀ emissions exceed 10 lbs/day. Rule 20.2 provides that BACT only applies to non-emergency emissions, which typically last one hour or less per day. Engines greater than approximately 650 brake-horsepower will likely trigger BACT for NOx. BACT for PM10₁₀ is unlikely to be triggered under Rule 20.2 but may be triggered to comply with Rule 1200. SOx BACT may be triggered depending on fuel use. BACT for NOx and SOx emissions from BUG's can be natural gas fueled engines or ARB certified diesel engines using CARB diesel, depending on technical feasibility and cost.

Engineering Division Manual of Procedures

- Rule 20.2-AQIA (Criteria Pollutants) – Air Quality Impact Analysis is required if NO_x or SO_x emissions exceed 25 lbs/hour or 250 lbs/day or if PM₁₀ emissions exceed 100 lbs/day. Only multiple engine projects or large engines, greater than approximately 1,625 brake-horsepower, are likely to trigger AQIA for NO_x if based on non-emergency operation emissions. An AQIA for PM₁₀ is unlikely to be triggered. An AQIA for SO_x may be triggered depending on fuel use. The few AQIA's that have been done recently for BUG's have been based on non-emergency operations but could be based on emergency plus non-emergency operations.
- Rule 1200 – Toxics New Source Review – Requires a project-specific health risk assessment, T(oxics)-BACT if risk is greater than 1 in a million, and non-cancer impacts below OEHHA recommended levels. Diesel-fueled BUG's emit diesel particulates, a state toxic air contaminant. Risks from diesel BUG's can exceed 1 in a million (or 10 in a million) depending on receptor distance, emission rates, stack configuration and anticipated hours of operation. T-BACT will typically be the use of catalyzed diesel particulate filters or alternative diesel fuels. Acrolein emissions from natural gas-fueled engines can pose potential adverse acute health risks, but this relies on a recent EPA emission factor that may be questionable. Rule 1200 provides that risk be evaluated based on the emission unit potential to emit. This includes both emergency and non-emergency hours. However, the number of emergency hours of operation is unknown with certainty. Electrical utility estimates in 2001 ranged from zero to more than 200 hours. Recent data indicates that actual emergency operations are infrequent.

Procedures for Evaluating and Permitting

Engineering will proceed with the permitting of new and replacement emergency backup generators applying the following requirements:

1. For applications for new or replacement BUG's received after July 9, 2001 and having NO_x or SO_x emissions that will exceed 10 pounds per day on a non-emergency day, the applicant must either propose as BACT a natural gas-fueled engine compliant with Rule 69.4.1 or demonstrate why a natural gas-fueled engine or a dual-fuel engine (gas as primary, diesel as backup) is not technologically feasible or cost-effective (@ \$6.60 or \$9.00/lb NO_x).

An advisory was sent in 2001 to all permit holders and interested parties informing them of this requirement.

For existing pending applications for new and replacement diesel emergency BUG's and for new applications where natural gas or dual-fueled engines are not technologically feasible or cost-effective, a diesel-fueled engine can be accepted. BACT will be based on compliance with Rule 69.4.1, including use of CARB diesel. (Note: This is intended to apply to emergency backup generators only. If

Engineering Division Manual of Procedures

an applicant is requesting to operate more than the allowed maintenance/non-emergency use or further controls must be evaluated for BACT.)

2. An Air Quality Impact Analysis must be conducted if emissions from one or more new BUG's at a stationary source are expected to exceed the AQIA trigger levels of Rule 20.2 (or Rule 20.3 if applicable). Rules 20.2 and 20.3 do not exclude emergency operation emissions from this analysis. However, the most recent information received from SDG&E indicates that emergency operations under rolling blackouts are not expected to exceed 6 hours in duration in a day, nor more than 8 hours in a day worst case. For purposes of determining whether an AQIA is required, and conducting the AQIA, it will be assumed that each engine will not operate more than 6 hours on any given day. Under this assumption, the hourly AQIA emission trigger will likely be the most stringent.

A replacement engine is not subject to an AQIA if it does not result in an emission increase. This will be assumed to be the case for a replacement emergency BUG if the NO_x, SO_x, PM₁₀ and CO (as applicable) hourly mass emission rates (lbs/hr) of the replacement engine are less than that of the engine it is replacing. For those replacement engines with higher emission rates, the hourly and daily (assuming 6 hours operation in any day) emissions difference (i.e. increase) will be used to test whether an AQIA is triggered.

3. Compliance with Rule 69.4.1, and all other applicable rules, must be shown for each new or replacement emergency BUG.
4. For each new emergency BUG, compliance with Rule 1200 must be shown. However, a replacement engine is not subject to Rule 1200 if it does not result in an emission increase. This will be assumed to be the case for a replacement diesel emergency BUG if the PM₁₀ hourly mass emission rate (lbs/hr) of the replacement engine is less than that of the engine it is replacing. For replacement natural gas fueled engines, the test will be whether estimated hourly acrolein emissions are equal to or less than that of the natural gas fueled engine being replaced. If hourly diesel PM₁₀ or acrolein emissions are less, a health risk assessment will not be required. A diesel engine replacing a natural gas engine (and vice versa) will increase emissions of a TAC (diesel PM₁₀ or acrolein) and must be evaluated under Rule 1200.
5. In July 2001, District policy was developed that specified that HRAs for emergency standby engines be conducted based on a total of 200 hours per year of emergency and non-emergency (maintenance and testing) operation. Additionally, TBACT was considered to be a PM emission rate of 0.15 g/BHP-hr or less. Due to advances in diesel engine particulate control technology, and considering historical data on emergency engine operation, the following procedures will be used to evaluate diesel IC engines for compliance with District Rule 1200 until further notice.

Engineering Division Manual of Procedures

Electrical utility estimates of hours of emergency use in 2001 ranged from zero to more than 200 hours. However, historical information to date has shown that actual emergency operations are negligible. Therefore, it is not appropriate, at this time, to assume 200 hours per year operation when evaluating these engines. Future Rule 1200 HRAs should be conducted using the allowable permitted maintenance and testing duration. For new emergency engines this will generally be 50 to 100 hours per year in accordance with ATCM section (e)(2)(A).

TBACT is defined as the most effective emission limitation or emission control device or control technique which: 1) has been achieved in practice for a source or category of source; or 2) is found by the Air Pollution Control Officer to be technologically feasible. The July 2001, policy established an engine emission rate of 0.15 g/bhp-hr as TBACT for emergency engines. Since that time, the diesel engine Air Toxics Control Measure (ATCM) was adopted and the use of diesel particulate filters (DPFs) has been proven to be technologically feasible and has been achieved in practice in numerous applications. Therefore, DPFs shall be considered to be TBACT for emergency stationary compression ignition engines. TBACT should not be required for any project based on the results of a screening HRA. Engines that fail a screening HRA will require a refined HRA unless the applicant chooses a lower allowable maintenance and testing duration that complies with Rule 1200 risk criteria.

Permitting engineers are reminded that AQIA and Rule 1200 requirements apply to a project, defined as an aggregation of emission units at a stationary source for which one or more applications for Authority to Construct and/or Permit to Operate are under District review. Thus, if application(s) have been received for multiple BUG's at the same stationary source, the aggregate air quality and public health impacts of all engines (and any other pending permit applications that would increase emissions at the stationary source) must be evaluated. For purposes of screening, the estimated risk of each new engine should be determined, then added for all new engines.

The above procedures are intended to allow expedited processing of applications for the majority of relatively clean new/replacement emergency backup generators while still ensuring compliance with District rules. Please bring any questions or problems that arise to the immediate attention of your supervisor or the chief of engineering.

13.10 Rule 69.4.1 Requirements - New Natural Gas-Fueled Emergency Standby Engines (February 7, 2002)

A problem has come up with how Rule 69.4.1 treats natural gas (NG)-fueled emergency standby engines. Rule 69.4.1 requires new and replacement emergency standby engines comply with the Section (d) emission standards. Those standards, which were developed with high use NG-fueled engines in mind, require add-on controls to comply with the NO_x emission limits. Without add-on controls, NG engines also have CO emission rates very close to the limits of Section (d). These controls are expensive and may not be particularly effective or cost-effective for an engine operated 1-2 hours per week or less.

Engineering Division Manual of Procedures

Certified diesel engines that comply with the Rule 69.4.1(d) standards without add-on controls are readily available and less expensive than NG-fueled engines with add-on controls. Rather than install a NG-fueled engine with controls, a facility will choose to put in a readily available, less expensive diesel-fueled engine.

The effect of this is that a diesel-fueled emergency standby engine that emits more NO_x [~6.9 gms NO_x/bhp-hr vs ~3.8 gms NO_x/bhp-hr (uncontrolled)] and emits a potent toxic air contaminant (diesel exhaust particulate) is installed in order to comply with Rule 69.4.1. The Rule Development Section is working on revisions to Rule 69.4.1 to correct this.

Until Rule 69.4.1 can be revised, the Engineering Division will not apply the NO_x and CO emission standards of Rule 69.4.1(d)(1) and (d)(2) to new or replacement natural gas-fueled emergency standby engines provided the NO_x emission rate of the engine is less than 6.9 gms/bhp-hr (the allowable rate for a new emergency standby diesel engine). CO emissions will be subject to the AQIA thresholds of Rules 20.2 and 20.3.

The remaining rule requirements will continue to apply, in particular the VOC limit in Subsection (d)(3) and the maintenance and recordkeeping requirements of the rule. Note that Subsection (b)(3) exempts new and replacement emergency standby engines from Subsections (e)(1), (e)(2), (f)(1), (g)(3), (g)(4), (g)(5) and (i)(1) of the rule. These exemptions continue to apply.

13.11 Startup/Commissioning Periods for Turbines and Engines (February 11, 2003)

Often it is impractical for a new (or replacement) turbine or engine to comply with the applicable emission standards of District Rules 69.3.1 or 69.4.1 from first fuel firing and during the initial startup/commissioning period, especially when the project includes add-on emission control equipment. Running time is needed to debug and adjust the turbine or engine. During this period, it is necessary to operate units without the required add-on control equipment fully installed and/or fully functional to protect the control equipment.

These startup/commissioning periods are typically limited to from a few hours to a few weeks, depending on the size and complexity of the turbines or engines and control equipment, and operational problems encountered. Total running time during these periods is usually very limited. Such shakedown operations can be accommodated under New Source Review but Rules 69.3.1 and 69.4.1 do not address this need.

The District is working on a new rule to provide for these initial startup/commissioning periods. Until the rule has been adopted, and to avoid an excessive number of variance requests, the District will use its enforcement discretion to implement the following procedure:

1. The District will not require compliance with the emission standards of Rules 69.3.1 or 69.4.1, or the BACT or LAER emission limits of New Source Review as

Engineering Division Manual of Procedures

applicable, for a new or replacement gas turbine or engine that requires a startup/commissioning period for the unit or add-on controls, for up to the first 200 operating hours for each turbine or engine, starting with first fuel firing. All other requirements of applicable District rules will continue to apply during the initial startup/commissioning period.

2. The operator must notify the District when first fuel firing occurs. A First Fuel Fire Notice form will be provided to the applicant (with the Authority to Construct) for this purpose. Once the operator has submitted a First Fuel Fire Notice form to the District, the operator may commence the startup/commissioning period in accordance with the Authority to Construct.
3. The operator must maintain a log of the dates, times and cumulative unit operating hours when fuel is being combusted in each turbine or engine during the initial startup/commissioning period.
4. The startup/commissioning period for a unit ends when the total 200 unit operating hours have elapsed, or when emission controls are installed and fully functional, and the owner/operator has provided the District with a Notice of Completion of Construction, whichever is sooner. If the unit will not be in compliance after 200 operating hours, the operator must discontinue operating or petition the Hearing Board for a variance to allow continued operations. If the unit is in compliance within the 200 hours and the operator has provided the Notice of Completion of Construction, operations may be allowed thereafter pursuant to Rule 24 or a District Startup Authorization.
5. The above requirements are to be reflected in Authorities to Construct for such projects.
6. The Authority to Construct conditions regarding scheduling initial compliance source testing are to be reworded as follows:
 - Within 60 days from the date that construction of the above equipment is complete in accordance with this Authority to Construct and a Notice of Completion of Construction is submitted to the District, an initial source test shall be conducted by an independent ARB approved tester or the District, at the applicant's expense, to determine initial compliance with the emission standards of this Authority to Construct and applicable District rules.
 - A source test protocol shall be submitted to the District for review and approval at least 30 days prior to the initial source test. The source test protocol shall comply with the following requirements:
 - a. Measurement of NO_x, CO and oxygen content of the exhaust gas shall be determined in accordance with San Diego APCD Test Method 100.

Engineering Division Manual of Procedures

- b. Measurement of VOC emissions shall be determined in accordance with EPA Test Methods 25A and/or 18. (*if VOC testing is required*).
 - c. NO_x, VOC (*if applicable*) and CO emission concentrations shall be calculated as an average of three subtests. The averaging period to calculate emission concentrations and to determine compliance from the results of source testing shall be at least 30 minutes and not more than 60 minutes unless otherwise specified in writing by the Air Pollution Control Officer.
 - d. Source testing shall be performed at no less than 80% of maximum sustainable power output or brake horsepower rating, as applicable.
- Within 30 days after the completion of source testing, a final test report shall be submitted to the District for review and approval. The testing contractor shall include as part of the test report a certification that to the best of their knowledge the report is a true and accurate representation of the test conducted and the results.

This procedure takes effect immediately. If you have any questions, please see your supervisor or one of us. A copy of a First Fuel Fire Form is attached for your use.

13.12 Evaluation of 40 Hour Testing and Maintenance Allowance for Hospital Facilities (July 7, 2007 – Tom Weeks)

The May 26, 2005 amendments to the Diesel Engine ATCM allow districts to approve operation of emergency engines at hospitals up to 40 hours in order to comply with the Joint Accreditation Manual for Healthcare Organizations requirements for more extensive and frequent testing of emergency standby engines.

On August 8, 2005 the Diesel ATCM Implementation Committee discussed the criteria that would be applied when determining if the 40 hours would be allowed. The committee determined that health risk assessments should be performed. Furthermore research indicated that a cancer risk of 10 in a million was used as a basis for the control levels specified in the ATCM (see the ARB staff report Appendix F, pages F-4 and F-7).

Therefore it was determined that 10 in a million would be the appropriate standard to apply so that these sources would be held to the same standard used for other similar sources. This standard will be applied to all hospitals requesting the 40 hour testing and maintenance allowance.

13.13 Mobile/Portable vs. Stationary Engines - Rules 69.4 and 69.4.1 Applicability (May 17, 2001 – M. Lake/T. Morris)

The question has come up regarding the applicability of District Rules 69.4 and 69.4.1 to mobile internal combustion engines that are associated with ancillary facility equipment

Engineering Division Manual of Procedures

such as fork lifts, tow motors or small mobile cranes that may be permanently located at a stationary source. These rules were intended to apply only to stationary internal combustion engines that, by definition, exclude portable emission units. They were not intended to apply to engines used to propel equipment such as forklifts, tow motors and small mobile cranes.

Section 40000 of the California Health and Safety Code distinguishes the authorities of the air districts and ARB regarding stationary and mobile sources. Section 40000 preempts air districts from regulating emissions from motor vehicles except in specified circumstances. Controlling emissions from motor vehicles is the responsibility of the ARB. Section 39039 of the Health and Safety Code defines “motor vehicle” as having the same meaning as defined in Section 415 of the Vehicle Code. Section 415 defines motor vehicle as a vehicle that is self-propelled. Section 670 of the Vehicle Code defines (in relevant part) a vehicle as a device by which a person or property may be propelled, moved or drawn upon a highway except devices used exclusively on stationary rails or tracks.

District Rule 2 defines a motor vehicle as a vehicle that is self-propelled, but does not define vehicle. However, Rule 11(d)(1) and (d)(2) provide further clarification of what types of engines used in conjunction with mobile sources are exempt from permits – typically if an engine is used solely for propulsion. If an engine is used on or within a vehicle to provide propulsion and other useful work, the test is whether the engine is used primarily for propulsion. The District has interpreted vehicles to include items that are capable of being propelled, moved or drawn on a highway (public or private road or right-of-way) even if they may not typically do that and even if they are not required to be licensed for movement on a highway.

Although Rules 69.4 and 69.4.1 may not explicitly exempt engines used solely or primarily to propel motor vehicles, the District is preempted from regulating emissions from such engines by the Health and Safety Code.

Therefore, the provisions of Rules 69.4 and 69.4.1 should not be applied to engines used solely or primarily to propel a vehicle such as a forklift, tow cart or small crane. The provisions of Rule 11(d)(1) and (d)(2) should be used as guidance, in particular where an engine is used in conjunction with specified types of mobile sources or for multiple purposes.

Moreover, since these rules were not intended to apply to these common types of mobile sources, the District will not routinely require facilities to make a demonstration that such engines are used primarily for propulsion. Requiring such a demonstration is burdensome and should be reserved for those cases where there is a demonstrable expectation that propulsion is the minority use, where there is a supportable opinion that an engine operator may be circumventing the requirements of the rules, or when an operator requests a written opinion from the District regarding rule applicability. Requests for such demonstrations must be pre-approved, in writing, by the Chief of Engineering, Chief of Compliance, or Assistant Director.

Engineering Division Manual of Procedures

13.14 Procedure for Review of Applications and Issuance of Certificates of Registration

This procedure has been developed to provide guidance when issuing Rule 12 or 12.1 registrations. Two options are available to applicants as shown on the attached process flow diagrams and the following procedure.

Option 1 – Application received electronically or via mail

10. **Application Submittal** - Applicant submits the application forms (App116 and the appropriate supplemented form) with appropriate fees.
11. **Permit Processing Review** - Permit Processing (PP) reviews the application to verify that correct fees and forms were submitted, creates the permit file, logs the application into the permit database and forwards the file to the Engineering Division (ED) after scanning out the application. If correct forms or fees have not been submitted, PP will notify the applicant and hold the application until sufficient fees are received to process the application. The PP review step should be completed within one working day of receipt of the application.
12. **Engineering Review** - The ED representative will pick up the file and scan it in. The ED representative will normally be an Engineering Technician but can be the assigned duty engineering as necessary to address staff availability issues. A completeness review will be performed and an incomplete letter in the form of a standardized incomplete letter/checklist will be issued, if necessary, within three working days of application receipt. If the application is complete, the ED representative will perform emission calculations, complete the engineering evaluation and draft the registration certificate.
13. **Consultation Meeting** - The ED representative will contact the applicant and offer to meet with them to review and issue the initial registration certificate. If the applicant declines the consultation meeting, the ED representative will issue the initial registration certificate via mail or email. Issuance of the initial registration for complete applications shall be within 10 working days of receipt.
14. **New BEC Creation** - If a new BEC is required to incorporate hours of use limitations the ED representative will request the new BEC using a standardized BEC template and forward the request to PP. Senior Engineer and Compliance Division approval is not required for these limited BEC changes.
15. **Permit Database Entry** - The ED representative will enter the permit information into the permit database system and forward the file to the Senior Engineer. Permit database entry shall be within 30 days of application receipt.
16. **Senior Engineer Review** - The Senior Engineer will review the file and approve it in the permit database system or return it to the ED representative for revision. After approval the Senior Engineer will forward the permit file to the Accounting Section for fee reconciliation.
17. **Fee Reconciliation** - Following fee reconciliation, the Accounting Section will forward the file to PP.
18. **Application Cancellation** - Incomplete applications for equipment subject to Rule 12 will be cancelled if the requested information is not supplied within 90 days of such

Engineering Division Manual of Procedures

request. Incomplete applications for equipment subject to Rule 12.1 will be cancelled if the necessary information is not supplied within 30 day of application receipt. Proposed cancellations must be approved by the Senior Engineer.

Option 2 – Walk-in Customer

- Jay*8. **Application Receipt** - Applicant arrives at the front desk with and application. All applications will first go to Permit Processing (PP) for verification that the correct forms and fees are available. If correct forms and fees are available, PP will copy the App116 form and contact the ED representative (the ED representative will normally be an Engineering Technician but can be the assigned duty engineer as necessary to address staff availability). If correct forms and fees are not available, PP will inform the applicant and provide them with information on how to complete the application. PP and the ED representative will work in parallel, where necessary from this point forward (see process flow diagram).
9. **Engineering Review** - The ED representative will escort the applicant to a meeting room. A completeness review will be performed and an incomplete letter in the form of a standardized incomplete letter/checklist will be issued if necessary. If the application is complete, the ED representative will perform emission calculations, complete the engineering evaluation, issue the initial registration certificate and explain the registration conditions to the applicant.
10. **New BEC Creation** - If a new BEC is required to incorporate hours of use limitations the ED representative will request the new BEC using a standardized BEC template and forward the request to PP. Senior Engineer and Compliance Division approval is not required for these limited BEC changes.
11. **Permit Database Entry** - The ED representative will enter the permit information into the permit database system and forward the file to the Senior Engineer. Permit database entry shall be within 30 days of application receipt.
12. **Senior Engineer Review** - The Senior Engineer will review the file and approve it in the permit database system or return it to the ED representative for revision. After approval the Senior Engineer will forward the permit file to the Accounting Section for fee reconciliation.
13. **Fee Reconciliation** - Following fee reconciliation, the Accounting Section will forward the file to PP.
14. **Application Cancellation** - Incomplete applications for equipment subject to Rule 12 will be cancelled if the requested information is not supplied within 90 day of such request. Incomplete applications for equipment subject to Rule 12.1 will be cancelled if the necessary information is not supplied within 30 day of application receipt. Proposed cancellations must be approved by the Senior Engineer.

14. Vapor Recovery Section Procedures

14.1 Rule 61.3 Enforcement Policy (May 25, 2000 – Rosa Salcedo)

Engineering Division Manual of Procedures

A Notice of Violation for Rule 61.3 will be issued whenever a submerged fill pipe is more than 6 1/2 inches from the bottom of the tank. The extra one-half inch will ensure that the fill pipe is, in fact, less than six inches from the bottom of the tank as required by Rule 61.3. A Notice of Violation for Rule 61.3 will be issued whenever a dry break that is inoperative is observed and there is gasoline in the tank.

14.2 Rule 61.2 Transfer of Volatile Organic Compounds (VOCs) into Mobile Transport Tanks (December 10, 1979)

There will be no fugitive vapor leaks along the vapor transfer path--that combination of piping, hoses, valves, fittings, storage tanks, saturator tanks, vapor processors and other devices--through which hydrocarbon vapors are transferred, stored or processed to meet the requirements of this rule. The vapor transfer path will include the interface between a mobile transport tank having a capacity greater than 550 gallons and the stationary storage tank facility vapor control fittings. The vapor transfer path will not include any mobile transport tank, vapor control processor exhaust or designated vapor control system vents.

14.3 Issuance of A/Cs and P/Os to Vapor Recovery (VR) Systems Certified by Air Resources Board (October 24, 2000 – Rosa Salcedo)

- A. All A/Cs will be issued citing Rule 20 and Section 41960 of the health and safety code.
- B. Concerns regarding the pressure drop criteria used for the certification of systems will be documented and presented to the ARB under the signature of the APCO in a timely manner.
- C. An application for a system certified by ARB at the efficiency required by the rule will be approved if an engineering analysis indicates the proposed installation is consistent with the ARB certified system.
- D. If a system is installed as specified in the A/C and ARB Executive Order, and all appropriate tests are passed, and maintained in proper working order, a P/O will be issued.
- E. Full scale efficiency testing will not be required as a condition for an A/C or P/O.
- F. Annual testing of specific parameters may be required as a condition for an A/C or P/O.

14.4 Documenting VR Violations by Engineers (August 20, 1979)

The vapor recovery engineers will document violations they observe during their field inspections. The documentation will be used to ensure that a Notice of Violation is prepared properly and presented to the responsible person.

Engineering Division Manual of Procedures

The violations will be sufficient to hold up in a criminal proceeding. When an engineer observes a violation, the engineer will call Compliance staff and request the assistance of an inspector. The inspector will observe the violation and document it. Then the inspector will issue the notice and prepare the report. The engineer will observe all of these actions in order to understand what will be required when a future violation is observed. The engineer will ask the inspector any questions that are raised during the inspection and documentation of the violation.

14.5 Vapor Recovery Station Rebuilds (July 28, 1994)

Applications for vapor recovery station rebuilds will be assigned fee code MAL instead of 26A or 26F. The fee will be calculated from fee schedule 26A or 26F, column 1 minus column 2. The initial fee cannot exceed this amount nor can any additional labor charges be recovered except re-inspections.

All labor charges will be charged to MAL except re-inspections. When a re-inspection is performed this labor will be charged to REF and will be invoiced separately upon completion of the application process.

The station's current permit must be active with all fees paid prior to accepting the application. Renewal fees must be paid each year until the application process has been completed and the District issues a revised permit using the existing permit number.

14.6 Inspection/Maintenance Manuals at Service Stations (December 4, 2001)

Vacuum-assist executive orders require manufacturers' installation and maintenance manuals be maintained on site. However, ARB has not formalized any approval process for these manuals and subsequent revisions. As a result, there has been confusion as to what manual(s) are to be maintained on site. Accordingly and effective immediately, vapor recovery facilities will no longer be required to maintain manufacturers' installation and maintenance manuals on site. This policy will remain in effect until ARB establishes a formal review process regarding these manuals.

14.7 Test Cancellation Fee (July 5, 2000 – Rosa Salcedo)

The revisions to District Rule 40 went into effect July 1, 2000. Fee schedule 26 now includes a test cancellation fee for any test scheduled to be witnessed by the District which is cancelled less than 2 working days prior to the test date. A site substitution within 2 days of the scheduled test date is considered a test cancellation. The fee should be charged to the original site.

To implement this new fee, it is imperative that we generate the invoices immediately after receiving notification of a test cancellation or substitution. All invoices should include the same standard language for "reason for invoice". A copy of this standard

Engineering Division Manual of Procedures

language is attached. Accounting has been consulted and they agree to automatically include the appropriate language if the invoices are clearly labeled as “**Test Cancellation**”.

Therefore, when receiving notice of a test cancellation or substitution you will need to take the following steps:

- 1) Obtain a “Request for Invoice” form. There are forms in the form boxes by Joe’s office.
- 2) Complete the Application No., ID #, P/O #, amount due, and Equipment Address blanks.
- 3) In the spaces allowed for “Reason to be typed on invoice” write:
 - “Test Cancellation”
 - Tester - *name of testing company*
 - Original test date – *enter test date as per our testing calendar*
 - Cancellation date – *date cancellation or substitution call received (if message left on VM over weekend, date received is first District working day after)*
- 4) Submit invoice to accounting immediately.

This fee applies to “no-shows” for a scheduled test.

It is important that we are all diligent about generating these invoices in a timely fashion and that we follow these steps. It is also necessary that we are careful to avoid misunderstandings in scheduling tests to avoid challenges of test dates.

14.8 Invoicing for Reinspection (July 5, 2000)

It is time to put an end to outstanding fees on applications due to reinspections that do not get invoiced until the application closes.

Therefore, the Vapor Recovery Section must now follow the District-wide procedure of invoicing as the project progresses rather than at the bitter end.

Standard language has been generated for “reason for invoice” and all invoices should include this language. A copy of this standard language is attached. Accounting has been consulted and they agree to automatically include the appropriate language if the invoices are clearly labeled as “**Reinspection Required**”.

Effective immediately the following policy is in effect for Vapor Recovery:

- 1) When returning from a field test that will require a reinspection, obtain a “Request for Invoice” form. (Available in the form boxes next to Joe’s office.)

Engineering Division Manual of Procedures

- 2) Complete the Application No., ID #, P/O #, and Equipment Address blanks.
- 3) Complete amount due blank. If you know the re-test will require a full day, enter amount equivalent to 13 hours of your time. If the re-test will require a brief visit, say for 2 or 3 nozzles, enter amount equivalent to 5 hours of your time. (These time estimates include 2 to 3 hours of REF office work.) Note that a re-test due to a no-show requires this invoice in addition to the test cancellation invoice. (Please be aware that the Schedule 94 has been revised when calculating your charges.)
- 4) In the spaces allowed for “Reason to be typed on invoice” write:
 - “Reinspection required”
 - Test date – *enter date you were at the site*
 - Reason – *no show or test/inspection failed*
 - Tester – *name of testing company*
- 5) Submit invoice to accounting immediately.

If the site fails on the second visit, a third visit should not be conducted until payment on the second visit (first reinspection) is verified. Regardless, a third visit should not be scheduled prior to discussing with me the circumstances under which the facility failed for possible application denial action.

It is important that we are all diligent about generating these invoices in a timely fashion and that we follow these steps. I expect these invoices to be submitted to accounting within two working days (based on each individual’s work schedule) of the original site visit.

Reinspection Invoice Language

The following language is to be used for requests for invoices generated by the Vapor Recovery Group when a reinspection is required.

When “reason” is noted as a no-show.

A District witnessed test was scheduled for your facility for _____ (insert date)_____. Your tester, (insert name of testing company), was not present at the scheduled time. Therefore, a District witnessed test will have to be rescheduled. Pursuant to District rule 40(a)(7), the applicant is required to pay the cost of a reinspection.

OR

When “reason” is noted as test/inspection failed.

Engineering Division Manual of Procedures

A District witnessed test and/or inspection was conducted at your facility on (insert date). Your facility failed to successfully complete all required testing and/or failed inspection. Therefore, a reinspection of your facility will be required. Pursuant to District Rule 40(a)(7), the applicant is required to pay the cost of a reinspection.

14.9 Applicability of Rule 1200 to Gasoline Dispensing Facilities (October 2, 2003)

Rule 1200 exempts gasoline service station emission units equipped with T-BACT if the increase in estimated cancer risk is less than 100 in one million and the total acute and chronic noncancer risks are less than 10. For the past 6 months the District has been evaluating Rule 1200 compliance for new and modified gas stations relative to the 10 in one million risk criteria of Rule 1200. The purpose of this was to gain information about gas station risks and determine the feasibility of eliminating the Rule 1200 exemption or otherwise limiting risk to 10 in one million.

After review and discussion of the results of this effort, the following policy has been developed:

1) Only **new (not modified) emission units** shall be reviewed for compliance with the 10 in one million criteria in Rule 1200. Evaluation of new facilities has value in that it may indicate stations that have elevated risks and may provide opportunities for risk reduction prior to construction. Rule 1200 only applies to an emission increase and therefore it is highly unlikely that a modification would not qualify for the exemption. Additionally, evaluation of modifications, which can be frequent, does little to characterize or manage the total risk from the station. Total risk for existing facilities will be better characterized and managed through the "Hot Spots" process.

2) If estimated risk from **new emission units** exceeds 10 in one million, the permit engineer should discuss the results of the risk assessment with the Sr. Engineer and/or the Chief of Engineering and evaluate potential voluntary risk reduction efforts that may be proposed to the applicant. If the facility agrees to voluntary risk reduction measures, permit conditions should be included in the facility permit to ensure the reductions are permanent and enforceable. If the facility does not agree to voluntary risk reduction measures, recordkeeping conditions should be included on the permit to facilitate compliance with AB2588.

3) All **new and modified emission units** will continue to be evaluated for compliance with the 100 in one million criteria in Rule 1200. This analysis will be conducted using the October 2002 screening procedure or a refined HRA if necessary. Permit conditions limiting throughput will only be applied if the requested throughput levels specified in the application indicate that the risk may exceed 100 in one million and it is therefore necessary to limit throughput.

Engineering Division Manual of Procedures

15. Emissions Inventory Procedures (M Luther, January 2021, J Lofgren December 2021)

The work related to Emissions Inventories and the prioritization scores for the AB2588 Air Toxics “Hot Spots” Program is performed within the EIS system with the labor recorded within Time Accounting in BCMS (see procedure 2.4.12), unless otherwise specified.

I. Types of Emission Inventories (EI’s)

There are multiple types of inventories the District conducts, each with its own facility list and timelines:

- Criteria Pollutants (District Rule 19.3, annual inventory)
- Toxic Pollutants for specific facilities (AB2588 “Hot Spots” Program (H&SC 44300 et. Seq.), Emissions Inventory Criteria and Guidelines Regulation (17CCR 93300.5), while the District processes these inventories every year, each facility is only included once every 4 years)
- Toxic Pollutants for Industry-wide sources (AB2588 “Hot Spot” Program, (H&SC 44300 et. Seq.), Emissions Inventory Criteria and Guidelines Regulation (17CCR 93300.5), once every 4 years inventory). Industry-wide sources as defined below.
- Criteria and Toxic Pollutants for the Criteria and Toxic Reporting Regulation (CTR, 17CCR 93400 et. Seq., annual inventory)
- Community Air Protection Program (for facilities within a designated community, per the Community Monitoring Plan or the Community Emission Reduction Plan, as needed)

Industry-wide sources, for toxic pollutants, are defined by CARB’s “Hot Spots” Program as a source that:

- (1) Qualifies to be included in an industrywide emission inventory prepared by an air pollution control or air quality management district pursuant to Health and Safety Code Section 44323
- (2) Releases, or has the potential to release, less than ten tons per year of each criteria pollutant, and
- (3) Is either of the following:
 - The facility falls in one of the following 4 classes of facilities: a. Autobody shops, as described by SIC Codes 5511- 5521 or 7532; b. Gasoline stations, as described by SIC Code 5541; c. Dry cleaners, as described by SIC Code 7216; d. Printing and publishing, as described by SIC Codes 2711-2771 or 2782; or
 - The facility that has not prepared an Individual Plan and Report in accordance with Sections 44340, 44341, and 44344 of the Health and Safety Code. This also includes Combustion-Diesel Engines.

Engineering Division Manual of Procedures

The District identifies these sources as being listed in BCMS under specific types of Fee Schedules, as follows:

- Combustion - Diesel Engines: All 34-except 34X, which includes [34C] Emergency Standby Engine, [34A] Cogeneration Engine, [34B] Cogeneration Engine w/ Emission Controls, [34C] Emergency Standby Engine, [34D] Engine for Non-Emergency & Non-Cogeneration, [34E] Dredging or Crane Engines, [34G] Engine for Non-Emergency and Non-Cogeneration Operation, [34H] California Certified Emergency Standby Engine, [34I] Engine Test Cell and Test Stand, [34L] Diesel Particulate Filter Cleaning Process, and [34W] Registered Engine (Rule 12).
- Gasoline – General Storage and Dispensing: [26A] Initial Installations and Renovations and [26C] Phase I.
- Autobody Shop Coating Operations: [27R] Vehicle Refinishing Operations.
- Dry Cleaning Operations: [31A] Facility using Halogenated Hydrocarbon Solvents.

II. Setting Up and Mailing Out the Inventory Requests – EI Team Members, Aide

Prior to January 1 of each year, data requests must be set up within EIS for the facilities that will be included in that year's inventories. Data requests are to be mailed out in early January to meet the required reporting deadlines.

A. Determining Facilities Subject to Inventory

At the end of each data year, the EI team should compile a list of facilities which will be subject to reporting emission inventories for that data year, including what type of program each facility should report to. The following guidelines are used to determine which programs are applicable:

- a. Criteria Emission Inventories – Facilities are categorized as criteria emission inventories if the facility emits more than 5 tons per year of VOC or NOx, as outlined in Rule 19.3
- b. AB2588 Hot Spots Toxic Emission Inventories (TEI) – TEI facilities are inventories on a four-year cycle. A facility may be inventoried at a higher frequency as part of another program, although prioritization scores and subsequent HRA requirements should follow only the TEI cycle.
- c. CTR – CTR facilities are inventoried on an annual basis and must meet one of the following criteria to be considered a CTR inventory:
 - i. GHG MRR – Facilities which are required to report GHG emissions according to CARB's Mandatory Reporting Regulation. If requested, CARB will provide a list of active GHG facilities to compare against active facilities for determination.
 - ii. Criteria – Facilities are designated as criteria for CTR if the facility emits greater than 250 tons per year of any nonattainment pollutant
 - iii. Elevated Risk – Facilities are categorized as elevated risk if the facility has:

Engineering Division Manual of Procedures

1. Facilities with cancer, chronic or acute Category A prioritization scores
2. Facilities expected, or resulted, in risks above Rule 1210 notification or risk reduction thresholds

B. New Facilities Subject to Inventory

Updated Permit to Operate data is pulled from BCMS and uploaded into EIS, to ensure all permits that were active during that year are included, then the devices (emission points) from each permit are determined and calculation methods are assigned to each device. Determination of inventory type should follow the procedure described above.

III. Deadlines for Facilities to Submit Their Information and Tracking the Status – EI Team Members, Aide

The different types of inventories have different deadlines for facilities to submit their information. Until a tracking ability is available in EIS, tracking the status of each facility will need to be done manually (spreadsheets, etc.). The statutory deadlines for facilities to submit their information are as below, however the data requests will be sent with a 60 day deadline for all inventories that can be extended (if needed and allowed for the type of inventory they are subject to):

Type of Inventory	Deadline to Submit	Extension Allowed?
Criteria	60 days after request (R19.3(c)(6)(i))	Yes, 60 days (R19.3(c)(8))
AB2588 (including Industry-wide)	180 days after request (H&SC 44341)	No
CTR	By May 1 (17CCR 93403(c)(1))	At District discretion but must process and submit inventory to CARB by August 1.
CAPP	As determined by the District	As determined by the District

Additionally, facilities that must submit an Emission Statement Form per Rule 19.3(c)(3), must submit that within 60 days of when the Form is sent to the facility, per Rule 19.3(c)(6)(i).

IV. Reviewing and Processing the Facilities' Information – EI Team Members, Aide and Senior Engineer

For instructions in how to navigate and use EIS, please see the [Guide to EIS in SharePoint](#).

Engineering Division Manual of Procedures

Once the facility submits their information (through online EIS Portal) the Aide will record this in EIS workflow. Then, if any data needs to be entered or uploaded into EIS, this will be done by the Aide or a EI Team Member, as appropriate.

Once the data submitted in EIS, the EI Team Member assigned will Quality Assure the data to ensure it is complete and makes sense (based on past inventories and type of source, i.e., a small metal coating operation probably would not use 10,000 gallons of paint, but might use 100 gallons), and ensure the correct calculation method is assigned to each device and material.

After the data is entered and reviewed, the EI Team Member will process the inventory by running the calculations and reports, then reviewing the resulting emissions, based on the reported usages. At this point, for facilities that are subject to the Air Toxics “Hot Spots” Program (AB2588), prioritization scores should be calculated (see section V of this procedure for more details).

Once the work has been reviewed and approved by the Senior Engineer, the EI Team Member will send the draft inventory (and draft prioritization scores if appropriate) to the facility for a 30-day review, using the template letters in [SharePoint](#). If the facility provides additional information to revise the inventory or prioritization scores, the information should be reviewed, and if approved, the EI Team Member will do the appropriate revisions. This review should be completed within 30 days of when the facility provides the additional information.

The deadlines to process the inventory are as follows:

Type of Inventory	Deadline to Process Inventory
Criteria	No deadline per Rule 19.3
AB2588 (including Industry-wide)	90 days after receiving the data (H&SC 44343)
CTR	Completed inventory must be submitted to CARB by August 1 (17CCR 93403(c)(1))
CAPP	As determined by the District

Once the approved revisions to the inventory are made, or if the facility has not provided any comments within 30 days, the inventory will be approved, and the facility notified of this approval in writing. AB2588 approved inventory must include a notification to inform the facility whether or not a HRA is required and the prioritization score if a HRA is required under the Hot Spots Program (please see section V of this procedure for more details).

V. Prioritization Scores and Health Risk Assessment Requirements for AB2588 Facilities- EI Team Members, Senior Engineer, Aide

For facilities being inventoried under the AB2588 “Hot Spots” program (the once every 4 years inventory), prioritization scores will be calculated based on the District’s [Air Toxics “Hot Spots” Prioritization Procedure](#), using the tools within EIS (see Section 15.2 Subsection 7 for how to do this). The EI Team Member will calculate the prioritization scores when the draft inventory created and include the scores in the Draft Report to the facility.

Engineering Division Manual of Procedures

If the prioritization scores are below the thresholds for requiring a AB2588 Health Risk Assessment (HRA), the inventory approval letter will indicate that a HRA is not required. If the prioritization scores are above the threshold for requiring a AB2588 HRA, the Aide will create a HRA record in BCMS for the facility (see Section 16 for the procedure for doing this). The EI Team Member will include the prioritization scores in the inventory approval letter and will attach the HRA required letter, using the template letters in [SharePoint](#).

Per the Health and Safety Code 44360(a) the prioritization scores must be finalized within 90 days of the emission inventory being approved.

VI. Inventory and/or Prioritization Revision Requests After they are Approved – Aide, EI Team Members, Senior Engineer

Once the emission inventory is approved, the facility may request additional changes to either the inventory or to the prioritization scores if they are under AB2588. If the facility is not subject to a AB2588 HRA, then the proposed revisions will be reviewed, and the time spent logged into Time Accounting (using the Emission Inventory labor codes).

However, if the facility is required to conduct a AB2588 HRA, **the time spent reviewing the proposed revisions must be logged into the HRA Record.** The EI Team Member will notify the HRA Team Member of the request for revisions, who will determine if an invoice is needed for the amount of time reviewing the revisions is expected to take.

VII. Posting records in documentum - EI Team Members & Senior Engineer

All relevant documents (i.e. documents associated with the inventory request, facility submittal and approved inventories) must be posted in BCMS under the SITE record. Except for invoices, all documents posted under the SITE records related to the Emission Inventory program must be posted in documentum using the “APCD-ENG-EI” or “APCD-ENG-HOTSPOTS” group and appropriate category as shown below. Please note that any confidential information such as “attorney-client” communication must be posted using the “trade secret” categories listed below. **All documents that are not designated as “trade secret” will be disclosed to the public. Draft documents, zipped files, and internal communication should NOT be posted in documentum.** For documents associated with a criteria, CTR or CAPP inventory, the group APCD-ENG-EI should be used:

Engineering Division Manual of Procedures

APCD1995-SITE-09138

Save Add Delete Cancel Help

Go To ▼ Summary Record - Site Information Activities Activity Summary Address

Document permissions are based on the document type and your role at APCD.

Document Group/Category [Required] *

APCD-ENG-EI

Division [Current Division](#)

APCD Engineering

Description

[check spelling](#)

Please use the fields at the bottom of the screen to

You can add multiple documents via the [Add] button.

--Select--

- APCD-EI-Correspondence
- APCD-EI-Correspondence-Trade-Secret
- APCD-EI-Data Request
- APCD-EI-Data Submittal
- APCD-EI-Data-Submittal-Trade-Secret
- APCD-EI-Emission Statement
- APCD-EI-Inventory Tracking
- APCD-EI-Prioritization
- APCD-EI-Report
- APCD-EI-Supporting-Documentation
- APCD-EI-Supporting-Documentation-Trade-Secret

For documents associated with a AB2588 Hot Spots inventory, the group APCD-ENG-HOTSPOTS should be used:

APCD2020-HRA-0003 - Miramar Energy Facility, SDG&E AB2588 Toxic Hot Spots HRA

Save Add Delete Cancel Help

Go To ▼ Summary Record Activities Activity Summary Address

Document permissions are based on the document type and your role at APCD.

Document Group/Category [Required] *

APCD-ENG-HOTSPOTS

Division [Current Division](#)

APCD Engineering

Description

[check spelling](#)

Please use the fields at the bottom of the screen to

You can add multiple documents via the [Add] button.

[Apply Definitions to Selected](#)

--Select--

- APCD-EI Supp docs
- APCD-EI Supp docs Trade Secret
- APCD-EI-Correspondences
- APCD-EI-Correspondences Trade Secret
- APCD-EI-Data Req
- APCD-EI-Data Submittal
- APCD-EI-Data Submittal Trade Secret
- APCD-EI-Emission Statement
- APCD-EI-HRA Submittal
- APCD-EI-Inv Tracking
- APCD-EI-Prioritization
- APCD-EI-Public Notification Approved
- APCD-EI-Public Notification Submittal
- APCD-EI-Report
- APCD-EI-Risk Red Approved
- APCD-EI-Risk Red Submittal

The following table list some critical documents that must be posted in BCMS with the specified document group/category.

Engineering Division Manual of Procedures

The name of the document should follow the following format:

<EI Year>_<Type of Document>_<EID #>

The Type of Document should follow the Document column below (Data Request, Inventory Submittal, Approved Inventory Report, etc.

As an example, for a data request for the 2020 inventory year for a facility with EID 350, the file name would be 2020_Data Request_EID 350.

Document	BCMS Records	Documentum Group	Documentum Category	Team Member Responsible for Posting the Document
Data Request NOT related to AB2588 (when facility is notified an inventory is needed)	SITE	APCD-ENG-EI	APCD-EI-Data Request	Aide
Data Request related to AB2588 (when facility is notified an inventory is needed)	SITE	APCD-ENG-HOTSPOTS	APCD-EI-Data Req	Aide
Inventory submittal from facility NOT related to AB2588	SITE	APCD-ENG-EI	APCD-EI-Data Submittal	Aide
Inventory submittal from facility related to AB2588	SITE	APCD-ENG-HOTSPOTS	APCD-EI-Data Submittal	Aide
Submitted Emission Statement Form as required by Rule 19.3(c)(3)	SITE	APCD-ENG-EI	APCD-EI-Emission Statement	Aide
Draft inventory sent to the facility including the 30-day comment letter NOT related to AB2588	SITE	APCD-ENG-EI	APCD-EI-Report	Aide
Draft inventory sent to the facility including the 30-day comment	SITE	APCD-ENG-HOTSPOTS	APCD-EI-Report	Aide

Engineering Division Manual of Procedures

letter related to AB2588				
Draft or Approved Prioritization scores	SITE	APCD- ENG - HOTSPOTS	APCD-EI- Prioritization	Aide
Request to revise inventory scores from facility, with the proposed revision(s) NOT related to AB2588	SITE	APCD-ENG-EI	APCD-EI-Data Submittal	Aide
Request to revise inventory/prioritization scores from facility, with the proposed revision(s)- related to AB2588	SITE	APCD- ENG - HOTSPOTS	APCD-EI-Data Submittal	Aide
Approved Inventory Report sent to facility NOT related to AB2588	SITE	APCD-ENG-EI	APCD-EI- Report	Aide
Approved Inventory Report sent to facility related to AB2588	SITE	APCD- ENG - HOTSPOTS	APCD-EI- Report	Aide
HRA Request (when facility is notified a HRA is needed under the Hot Spots program)	HRA	APCD-ENG- HOTSPOTS	APCD-EI- Correspondences	Aide
Notification rescinding the HRA request	HRA	APCD-ENG- HOTSPOTS	APCD-EI- Correspondences	Aide

In addition to the documents listed above, which should be posted in documentum, the following records related to Emission Inventories should be maintained in SharePoint:

- **Emission Inventory supporting documents (e.g. calculation sheets). Please note that all facility submittals must be maintained in SharePoint.**
- **Tracking sheets**
- **Templates**
- **Guidance/reference documents**

Internal communication and draft document should NOT be maintained in SharePoint or BCMS.

Engineering Division Manual of Procedures

15.1 Emission Inventory Fees

The District collects fees from facilities which are applicable to District Rule 40.d.4.ii and AB2588 “Hot Spots” State Fees Regulation. The purpose of collecting fees is to recover District and State costs associated with implementing regulatory programs. Fees are determined and collected monthly as described below.

I. 5 Ton per Year (tpy) Criteria Pollutant Fee, District Rule 40.d.4.ii

Monthly, permits processing supplied emission inventory a list of sites which have permit renewal fees within that month. 5 tpy fees are calculated for those sites listed on the monthly renewal list and proposed to permit processing for inclusion in the renewal invoices. There are two alternatives to calculate 5 tpy fees, as described in Rule 40.d.4.ii:

- Actual Emissions - Fees are suggested based on the actual emissions of the facility, as determined by the latest approved emissions inventory report. Per Rule 40.d.4.ii.A, if the actual expected annual emissions of carbon monoxide (CO), oxides of nitrogen (NO_x), oxides of sulfur, particulate matter (PM₁₀) **or** volatile organic compounds (VOC) equal or exceed five tons, then the Air Contaminant Emissions Fee shall be based on the total expected emissions of all these contaminants for that calendar year, multiplied by an air contaminant emissions fee rate of \$116 per ton).

For example, if a facility has the following criteria emissions:

CO – 1 tpy
NO_x – 2 tpy
PM₁₀ – 6 tpy
SO_x – 1 tpy
VOC – 2 tpy
Total = 12 tpy

This facility would be applicable because PM₁₀ is over 5 tpy, and the fee would be the sum multiplied by the fee rate – 12 tpy x \$ 116/ton = \$1,392 proposed fee. A template has been created to aide in the creation of these fees and it is found on SharePoint under Emission Inventory – 9 – Emission Fees (Permit Processing) – 1 – Procedures⁴. This template should be updated as indicated in the instructions on an annual basis.

- Special Fee Schedule - Fees determined based on special fees schedules, in the absence of actual approved emissions inventory by the District. For these a single Air Contaminant Emissions Fee would be charged based on the nature of the activities at the stationary source. The Rule specifies the following fee schedules -

⁴<https://sdcountycagov.sharepoint.com/:x:/s/apcd/Engineering/EY0KSHAcSD5Hh3tgkU62KUCBipe2UJIY8ZfZ-ooFqJY7Zw?e=h351G6>

Engineering Division Manual of Procedures

26(a), 28 (k and l), 28(f), 27(e), 27(k), 27(v) and Various- for all other stationary sources, to be subject to this type of fees.

In general, the following procedure is used to estimate and propose emission fees for facilities:

- A. Identify whether the sites on the list have been inventoried. If the site has not been inventoried, we don't make any recommendations for emissions fees.
- B. For the sites which have been inventoried:
 1. Identify the facility emissions inventory facility ID (EID or EIF ID), under which each site was inventoried.
 2. For some of the large facilities, multiple sites may exist, were inventoried as one entity that has one EID and one site designated as a Parent Site. If one of the sites in Permits Processing List is part of a facility with multiple sites, identify the EID and if that site is a Parent Site.
 3. For each EID, identify the latest year of approved emissions inventory. Utilize the facility's latest approved emissions report to collect annual emissions of the five criteria pollutants: carbon monoxide (CO), oxides of nitrogen (NOx), oxides of sulfur, particulate matter (PM10) and volatile organic compounds (VOC).
 4. If any criteria pollutant is greater than 5tpy, the summation of the yearly emissions of all five criteria pollutant will be calculated in Tons then multiplied by \$116/Tons. The resulting value will be presented to permits processing as recommended fees.
 5. If each one of the five criteria pollutants < 5 tpy, no recommendation will be made, and we leave it to permits processing to choose between standard or special schedule fees.
 6. If a Site is a part of multi-site facility, emissions fees will be calculated and recommended only when that site under review is the Parent Site of the facility. No recommendation will be made for the rest of the sites under this Facility as all the sites are inventoried together (one inventory = one fee). For the rest of the sites under that facility, zero fees are recommended.

II. AB25 88 "Hot Spot" Emission Fees

As described in CARB's AB2588 "Hot Spots" Fees Regulation⁵, the District must charge facility's fees for participating in the AB2588 program. The district utilized the following resources to aide in the development of these fees:

⁵ <https://ww2.arb.ca.gov/our-work/programs/ab-2588-air-toxics-hot-spots/ab-2588-hot-spots-state-fees>

Engineering Division Manual of Procedures

1. Chart and Graph as provided on CARB's Website "Hot Spots" State Fees Categories & Costs⁶
2. CARB's Annual Status Reports – Core and IW Fees

Fees are developed for both production and industry-wide facilities as described below:

Industry-wide Facilities:

- Industry-wide facilities should be charges an annual flat fee of \$35 according to CARB's website and Annual Status Reports as mentioned above
- Although industry-wide facilities are inventoried once every four years, as is required, fees are charged on an annual basis.

Production Facilities:

- Compared to industry-wide facilities, production facilities are larger and more complex. While the District may inventory the facility on an annual basis for reporting programs other than "Hot Spots", prioritization scores, and subsequent HRA requirements, are only created once every 4 years.
- Fees for production facilities are estimated based on two elements, each described below:
 - Category:
 - Fees categories are risk-based, as determined by a district approved Health Risk Assessment (HRA) or prioritization scores, and aligned with the categories described in ARB- "Hot Spots" State Fees Categories & Costs. The categories are based on cancer risk or a combination of both cancer and non-cancer (Acute/Chronic) risk, as reflected in categories ,B, C, D, F, and G.
 - Categories are determined by the most recent approved HRA results. If the facility does not have an approved HRA, then the most recent prioritization scores should be used. If a facility has a prioritization completed that triggered conducting a HRA, the prioritization cancer scores will be used for assessing its Hot Spots Fees, pending the approval of the HRA. The Prioritization Cancer Scores will also be used to determine Fees for the facilities that didn't trigger a HRA requirement. In both cases, the Cancer score will be compared to the Categories (A) of ARB- "Hot Spots" State Fees Categories & Costs⁷ and the (Update Facility or Low-Level Facility) Categories of CARB-"Hot Spots" Fee Categories Flowchart, to specify the Fees.

⁶ <https://ww2.arb.ca.gov/hot-spots-state-fees-categories-costs>

Engineering Division Manual of Procedures

- Complexity
 - Site complexity is based on the number of site processes as determined by six-digit Source Classification Codes (SCC). ARB-Air Toxics "Hot Spots" Fee Regulation- Title 17 CCR 907017, defines the facility as being:
 - Complex Facility: has more than five processes.
 - Medium Facility: has three to five processes.
 - Simple Facility: has one or two processes.
 - The Calculation method in EIS captures the SCC of the facility processes and the number of unique captured SCC in the facility Emissions evaluation is used to specify its complexity.

15.2 Guide to EIS

Please follow the Step-by-Step instructions in this general guidance document for emissions inventory data entry, reporting, calculating prioritization scores, and tracking status (workflow). For details regarding particular operations, please use the District Toxics page for reference. Any specific questions that arise during the inventory process can be addressed to any of the engineers in the Toxics group.

https://www.sandiegocounty.gov/content/sdc/apcd/en/engineering/Permits/Engineering_Emissions_Inventory.html

1) How to Log in to your EIS account

1. Go the following address: <http://cosd-www.cloudapp.net/COSD/Account/LogOn?ReturnUrl=%2fCOSD%2f>.
2. Log in using your District email address and the password you created when you set up your EIS account.
3. If you have difficulties with logging in, you may try re-setting your password by clicking on "Forgot Password". After providing a new password, try logging in with the new password.

⁷ <https://ww3.arb.ca.gov/regs/title17/90701.pdf>

Engineering Division Manual of Procedures

San Diego APCD - Emissions Inventory System (EIS)

APCD
AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO

EIS Login Page
EIS is Only Available from Monday to Friday,
7:00am to 7:00pm, Pacific Time

Username

Password

☐ Remember me

Log In

[Forgot Password?](#)

EIS Version 2.1.2 en-US - 05-Apr-2019
© 2012-2019 Lakes Environmental Software

2) How to enter data into EIS

There are two options for data entry in EIS:

- a. PRD_COSD (Production) – this is where all facility data should be entered and stored if the facility did NOT enter data themselves into the Portal (below) meaning the facility provided data request via hardcopy or electronic copy.
- b. APCD_Portal (Portal) – this is where the Facility directly entered data themselves with their own EIS account. If the Facility entered data in the Portal, this should be QA'd for completeness. Click on PRD_COSD.

Data Entry Via Production –



. Per District Rule 19.3, data submitted by the facility will be submitted using the data request forms till data year 2021 and then use of the EIS portal will be required. The Aide or EI Team Member may should download the data submitted by the facility and upload to the appropriate Everything placed in the SharePoint will be found using the following link:

<https://sdcountycagov.sharepoint.com/sites/apcd/Engineering/SitePages/Home.aspx?RootFolder=%2Fsites%2Fapcd%2FEngineering%2FShared%20Documents%2FEmissions%20Inventory%2F2%20%2D%20Emissions%20Inventory&FolderCTID=0x012000EE39BA8F198AD74CB4B836087AAE73F3&View=%7BC34333F3%2DE384%2D44A8%2D860B%2DA667D1DB7A7F%7D>

Engineering Division Manual of Procedures

1. Click on the Production link (PRD_COSD) which will take you to the Data Request Dashboard.

Select EIS Project



Enter search tags...  


#	Project Name	Project Description
1	PRD_COSD	PRD_COSD
2	APCD - PORTAL	PRD - Public Portal

2. Select the Inventory year you want to enter data for by clicking on the “Inventory: Year – Year Inventory Production” towards the upper right part of the screen.

Inventory Configuration

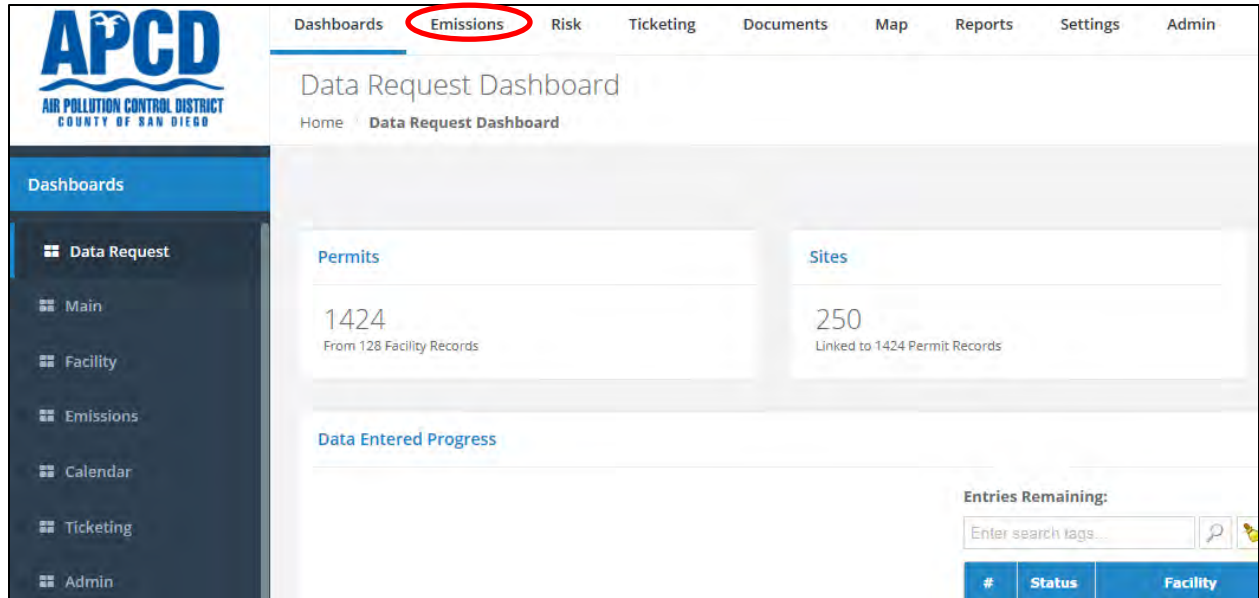
Please select an emissions inventory to work with from the list, by clicking on the Inventory Name.

Enter search tags...  

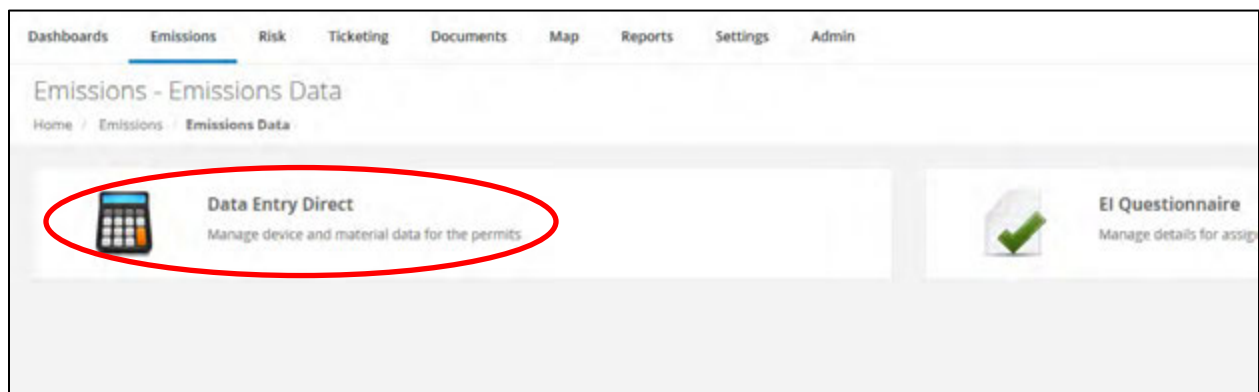
#	Inventory Name	Created By	Creation Date
		All	
1	2016 - 2016 Test	Mary Vasquez	06-Apr-2016
2	2015 - 2015 Mary's new inventory	Mary Vasquez	15-Mar-2016
3	2015 - 2015 Inventory New (spare)	Mary Vasquez	08-Apr-2016
4	2015 - 2015 Inventory (Production Spare)	Mary Vasquez	03-Jun-2016
5	2015 - 2015 (2nd Spare)	Mary Vasquez	12-Apr-2016
6	2071 - EASIER Import Production	Mike Johnson	03-May-2018
7	2018 - 2018 Inventory Production	Russell K. Yanagihara	19-Sep-2018
8	2017 - 2017 Inventory Production	Russell K. Yanagihara	18-Apr-2018
9	2016 - IW Import Test	Elizabeth Davis	16-May-2017
10	2016 - 2016 Inventory Production	Mary Vasquez	22-Feb-2017

3. Click on the Emissions link towards the top of the screen.

Engineering Division Manual of Procedures



4. Here you can select from two different formats for entering data (Data Entry Direct or EI Questionnaire). For this example, select Data Entry Direct.



5. Here is where you can search for your facility to enter data in the search box using the Facility name or EIF ID. When you find your facility, click Select.

Engineering Division Manual of Procedures

The screenshot shows the 'Calculation Configuration' page. At the top, there is a navigation bar with links: Dashboards, Emissions, Risk, Ticketing, Documents, Map, Reports, Settings, and Admin. Below this, the page title 'Calculation Configuration' is displayed, followed by a breadcrumb trail: Home > Emissions > Emissions Data > Data Entry Direct. The main section is titled 'Calculation Configuration' and contains a 'Facility' search bar with the placeholder text 'Enter search tags...'. Below the search bar is a table with the following data:

#	Facility Name	EIF ID
1	General Dynamics NASSCO	19
2	Canyon Rock	27
3	CEMEX Construction Materials Pacific LLC	56
4	Cabrillo Power I LLC	73

- This is the Calculation Configuration page where all Sites, Permits, Devices, and Materials are listed. All data entries are to be done for under Materials. To begin entering data, select the device and click on one of the materials listed for a listed device. A note about device numbers – within a facility, no 2 devices can have the identical device number. New device numbers should follow the following format: use the permit number if there is only one device associated with the permit, but if there are 2 or more devices, use the last 4 numbers of the permit plus 2 sequential numbers (i.e., PTO-971234, the device number would read 123401, 123402, etc.). The default number of permits /pages that appear in the platform is 5 permits, this can be increased up to 80 permits.

The screenshot shows the 'Calculation Configuration' page with three panels: 'Facility Permits', 'Devices', and 'Materials'. The 'Facility Permits' panel shows a table with columns: #, Permit #, Permit Version, Site, and Permit Description. The 'Devices' panel shows a table with columns: #, Device ID, and Description. The 'Materials' panel shows a table with columns: #, Material ID, SEC, and Description. The 'Materials' table has two rows highlighted with a red circle:

#	Material ID	SEC	Description
1	10200602		NATURAL GAS
2	10200501		DIESEL

- Select the appropriate Calc Method corresponding to the Permitted operation. This will be reflected in the title of the Facilities Data Request and the permit description. Click Select Calculator, then select from the listed calc methods.

Engineering Division Manual of Procedures



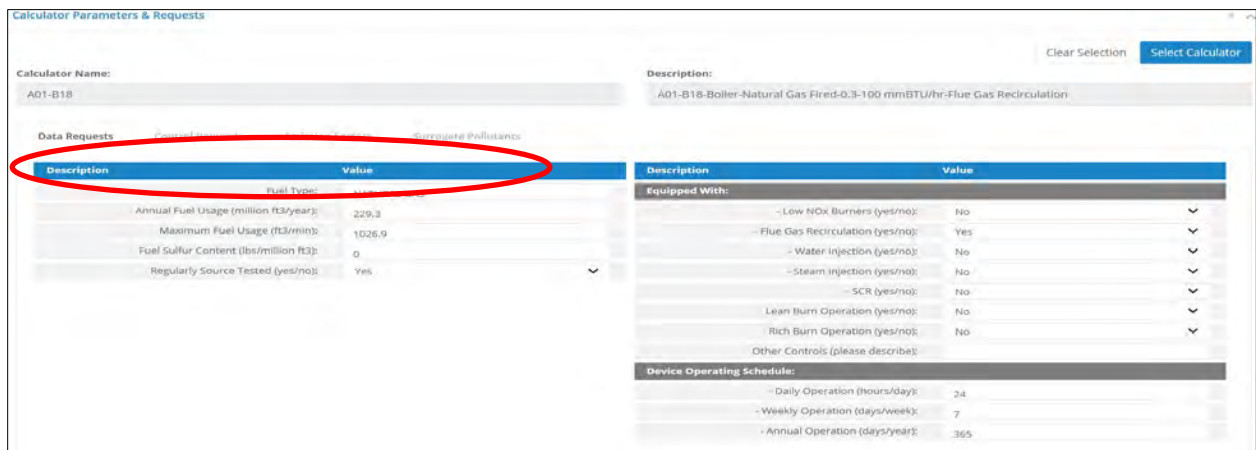
Calculator Parameters & Requests

Clear Selection Select Calculator

Description:

A01-B18-Boiler-Natural Gas Fired-0.3-100 mmBTU/hr-Flue Gas Recirculation

8. Scroll down to Calculator Parameters & Requests. There are 4 sections listed where you will enter raw facility data:
- Data Requests – complete all sections according to facility provided data request. Ensure that annual and hourly usages have been provided by facility.
 - Control Requests – Several facilities will already have this data pre-entered however a QA should be done versus submitted data requests to ensure this is correct. If blank, fill in all control parameters according to data request and ensure that the sum of the capture efficiencies equals 100%.
 - Emission Factors – For each selected calculation method, default Emission Factors will auto-populate. For those facilities that have devices with specific emission factors based on source test data or for specific paints, those will require to be manually updated and the origin of the source test data should be chosen. See Source Test tip in later section of this guidance document.
 - Surrogate Pollutants (if needed) – For some pollutants, surrogate pollutants must be specified. One example is hex chrome. While the Welding and Thermal Spraying calculation methods have this built in, if there are other calculation methods or other pollutants that need this, the procedure is as follows (using chromium as an example). Press the Add button and under the Pollutant column, add Chromium, Total and the corresponding Surrogate Pollutant should be Chromium, Non-Hexavalent. Add one more line and again add Chromium, Total and the corresponding Surrogate Pollutant should be Chromium, Hexavalent.



Calculator Parameters & Requests

Calculator Name: A01-B18

Description: A01-B18-Boiler-Natural Gas Fired-0.3-100 mmBTU/hr-Flue Gas Recirculation

Data Requests

Description	Value
Annual Fuel Usage (million ft ³ /year):	229.3
Maximum Fuel Usage (ft ³ /min):	1026.9
Fuel Sulfur Content (lbs/million ft ³):	0
Regularly Source Tested (yes/no):	Yes

Equipped With:

Description	Value
- Low NOx Burners (yes/no):	No
- Flue Gas Recirculation (yes/no):	Yes
- Water Injection (yes/no):	No
- Steam Injection (yes/no):	No
- SCR (yes/no):	No
- Lean Burn Operation (yes/no):	No
- Rich Burn Operation (yes/no):	No
Other Controls (please describe):	

Device Operating Schedule:

Description	Value
- Daily Operation (hours/day):	24
- Weekly Operation (days/week):	7
- Annual Operation (days/year):	365

9. Scroll back up towards the Materials section and click Save.

Engineering Division Manual of Procedures

10. Repeat steps 7 through 9 for ALL listed Materials for the Facility. Ensure that all data entries for each material are saved prior to moving to the next material, to avoid data losses.

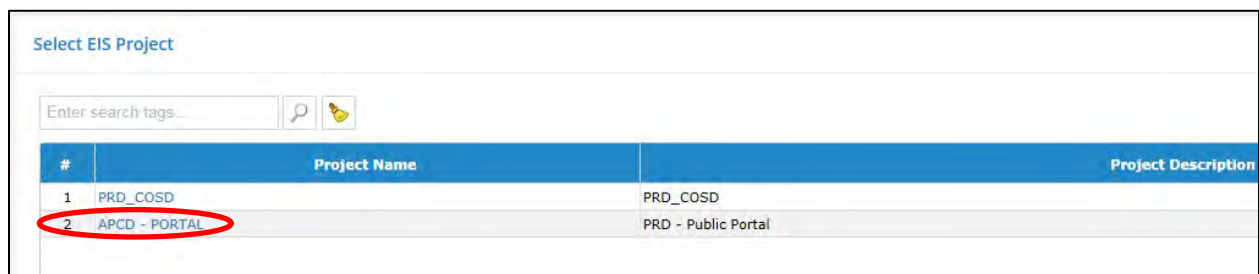
Data Entry Via Portal –

If the Facility provided data online via the EIS Portal, there should be an email by the Facility stating that their data was submitted online in the appropriate SharePoint folder for that inventory year. Use the same link

(<https://sdcountycagov.sharepoint.com/sites/apcd/Engineering/SitePages/Home.aspx?RootFolder=%2Fsites%2Fapcd%2FEngineering%2FShared%20Documents%2FEmissions%20Inventory%2F%20%2D%20Emissions%20Inventory&FolderCTID=0x012000EE39BA8F198AD74CB4B836087AAE73F3&View=%7BC34333F3%2DE384%2D44A8%2D860B%2DA667D1DB7A7F%7D>)

to check how the Facility data was provided to the District. Use the following procedures for Portal entries.

1. Click on link next to “Project:” in upper right-hand corner of page if currently in Production (PRD_COSD) which will take you to the Data Request Dashboard.

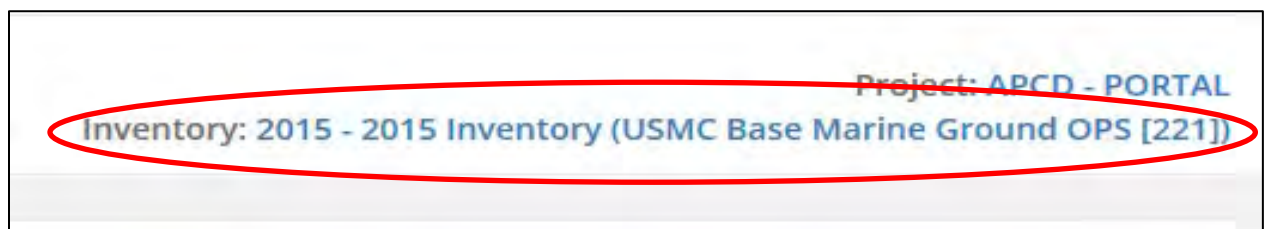


Select EIS Project

Enter search tags...

#	Project Name	Project Description
1	PRD_COSD	PRD_COSD
2	APCD - PORTAL	PRD - Public Portal

2. Select Facility you want to enter data for by clicking on the “Inventory: *Year – Year Inventory (Facility)*” towards the upper right part of the screen. Then search for the Facility

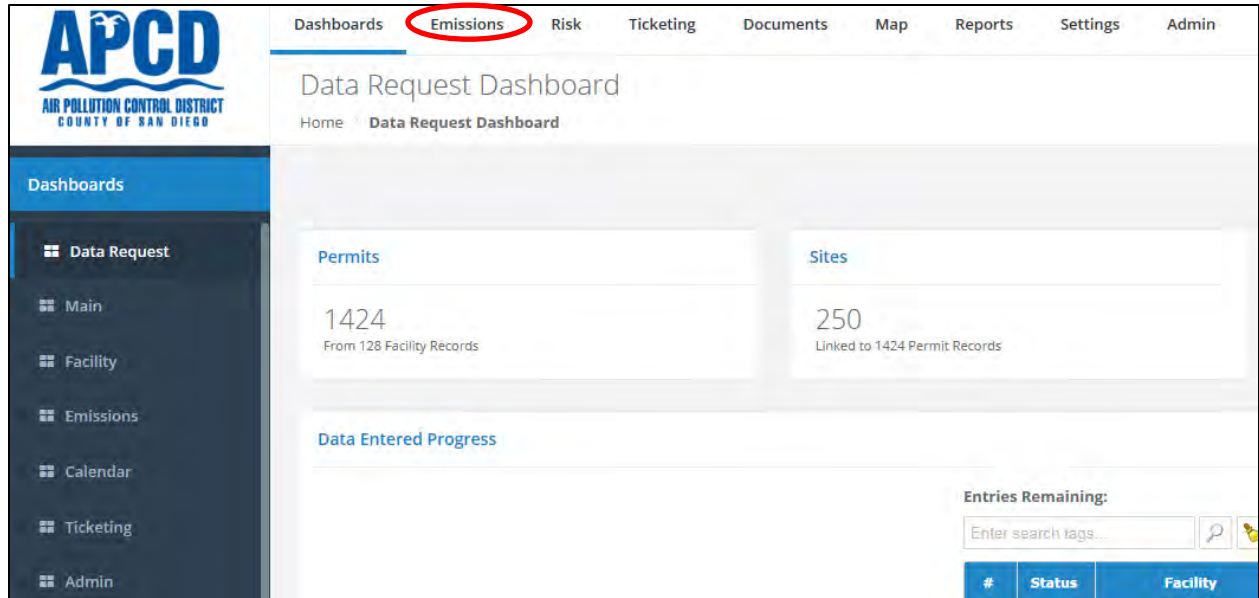


Project: APCD - PORTAL

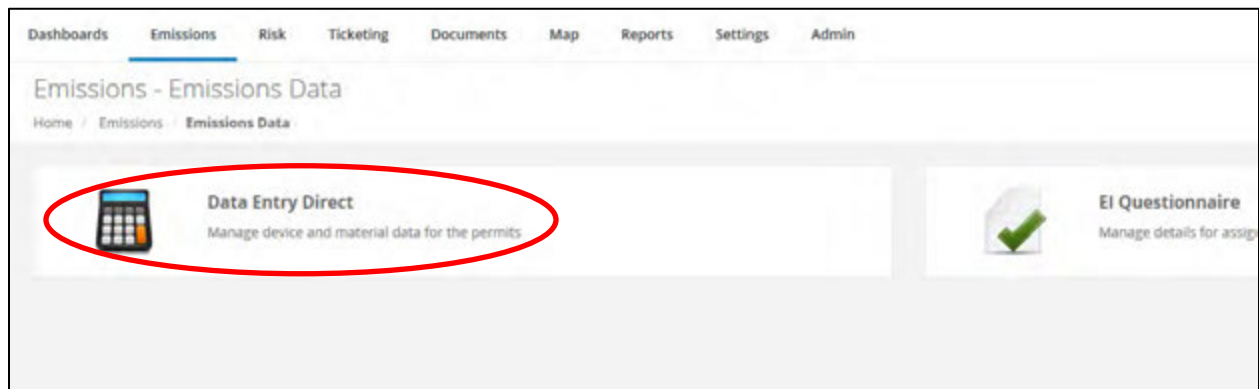
Inventory: 2015 - 2015 Inventory (USMC Base Marine Ground OPS [221])

3. Click on the Emissions link towards the top of the screen.

Engineering Division Manual of Procedures



4. Here you can select from two different formats for entering data (Data Entry Direct or EI Questionnaire). For this example, select Data Entry Direct.



5. Check to ensure all data entered by Facility is completed for each material in the Calculator Parameters & Request section. As in Production, ensure that the Control Request tab is also complete and correct and that the capture efficiencies equal 100%. If there is any required data missing (e.g. annual usage, hourly usage, or operating schedule) contact Facility to acquire that information.

Engineering Division Manual of Procedures

Calculator Parameters & Requests

Calculator Name: A01-B18 Description: A01-B18-Boiler-Natural Gas Fired-0.3-100 mmBTU/hr-Flue Gas Recirculation

Clear Selection Select Calculator

Data Requests Control Requests Emission Factors Surrogate Pollutants

Description	Value	Description	Value
Fuel Type:	NATURAL GAS	Equipped With:	
Annual Fuel Usage (million ft ³ /year):	229.3	- Low NOx Burners (yes/no):	No
Maximum Fuel Usage (ft ³ /min):	1026.9	- Flue Gas Recirculation (yes/no):	Yes
Fuel Sulfur Content (lb/million ft ³):	0	- Water Injection (yes/no):	No
Regularly Source Tested (yes/no):	Yes	- Steam Injection (yes/no):	No
		- SCR (yes/no):	No
		Lean Burn Operation (yes/no):	No
		Rich Burn Operation (yes/no):	No
		Other Controls (please describe):	
		Device Operating Schedule:	
		- Daily Operation (hours/day):	24
		- Weekly Operation (days/week):	7
		- Annual Operation (days/year):	365

6. Once data has been confirmed to be entered by the facility. The user will generate a PDF copy of the data submitted using the “Data Entry Forms”

Accele Automation EIS | Emissions - Data Entry Form Engineering -

Not secure | cosd-www.cloudapp.net/COSD/Nav/M

APCD San Diego County Air Pollution Control District

Dashboards Emissions Risk Ticketing Documents Map Reports

Emissions - Data Entry Forms

Home / Emissions / Data Entry Forms

Emissions

- Emissions Data
- Inventory Setup
- Calculators
- Data Entry Forms
- Tools

Upload EIQ Spreadsheet

Import EIQ data from an Excel file

Download EIQ Spreadsheet

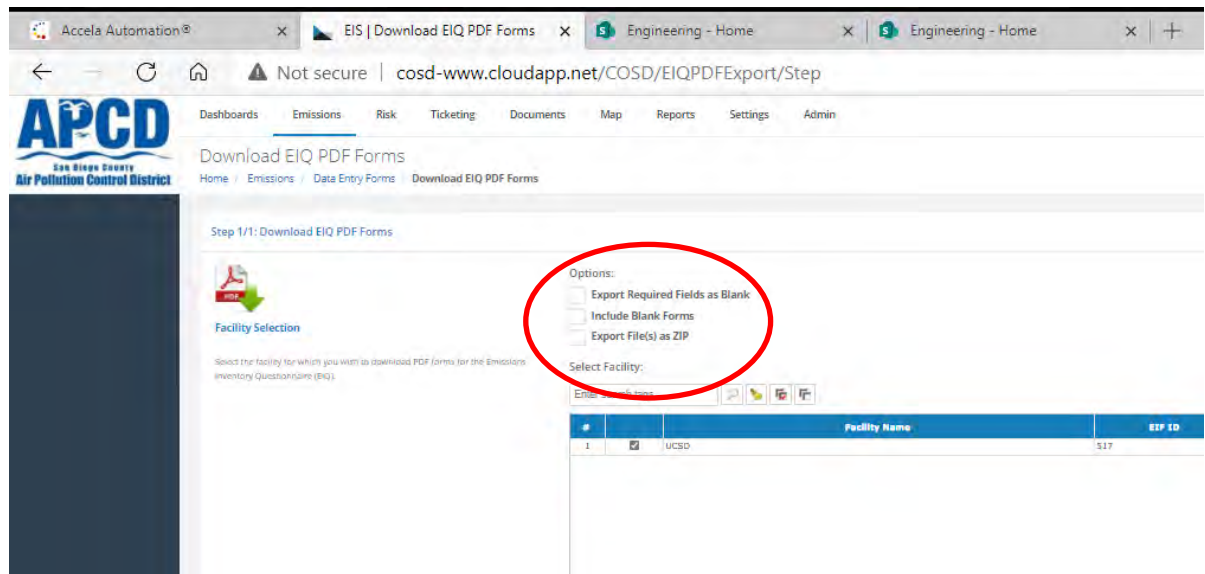
Export EIQ data to an Excel file

Download EIQ PDF Forms

Generate a PDF of completed and blank EIQ data forms

Engineering Division Manual of Procedures

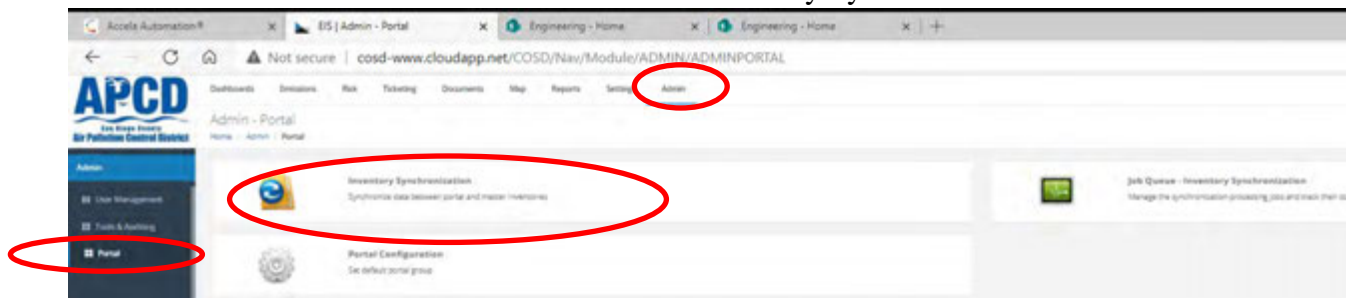
To print out the completed data forms deselect the following options which are defaulted as active: “Export Required Fields as Blank” and “Include Blank Forms”



The screenshot shows the 'Download EIQ PDF Forms' page in the APCD system. The page has a sidebar with the APCD logo and a main content area. The main content area has a header 'Download EIQ PDF Forms' and a sub-header 'Step 1/1: Download EIQ PDF Forms'. There is a 'Facility Selection' section with a text input field and a 'Select Facility' button. Below this is a table with the following columns: 'Facility Name' and 'EIQ ID'. The table has one row with the value 'UCSD' and '117'. To the right of the table, there are three options: 'Export Required Fields as Blank', 'Include Blank Forms', and 'Export File(s) as ZIP'. These options are circled in red.

This will prompt the user to the Queue where you can download the completed Data Requests for the Facility. Once finished, click View Files and then click Download. Save pdf file to SharePoint to have a copy of the facility submittal.

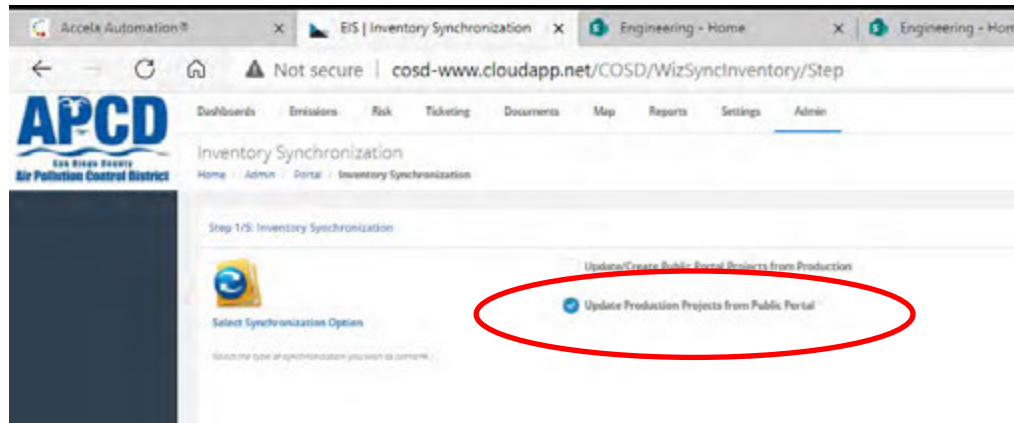
7. Once the data has been saved the data can be migrated back into the Production inventory from Portal. While in Production inventory for the particular inventory year you want to import data back into go to the Admin menu on the top and Portal Admin function on the left menu. Select “Inventory Synchronization”.



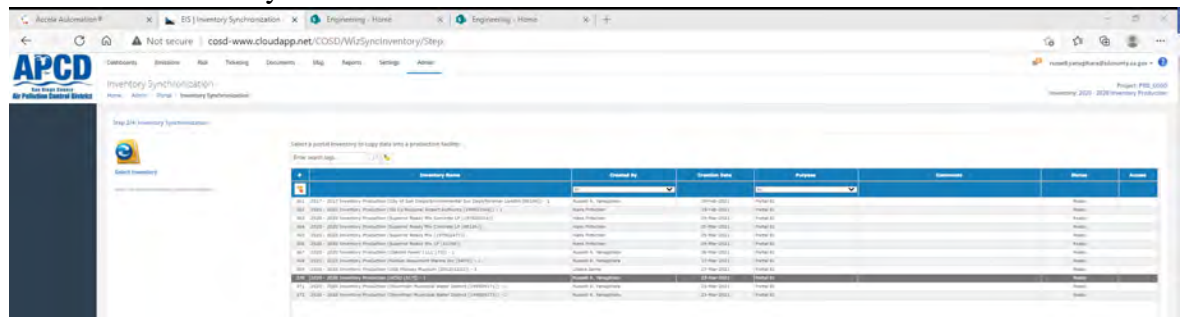
The screenshot shows the 'Admin - Portal' page in the APCD system. The page has a sidebar with the APCD logo and a main content area. The main content area has a header 'Admin - Portal' and a sub-header 'Home - Admin - Portal'. There is a 'Portal' menu on the left with options like 'User Management', 'Tools & Settings', and 'Portal'. The 'Portal' option is circled in red. In the main content area, there are two options: 'Inventory Synchronization' and 'Portal Configuration'. The 'Inventory Synchronization' option is circled in red.

8. Once selected the user will be taken to a screen to start selections on importing the data back into Production. Select “Update Production Projects from Public Portal”

Engineering Division Manual of Procedures

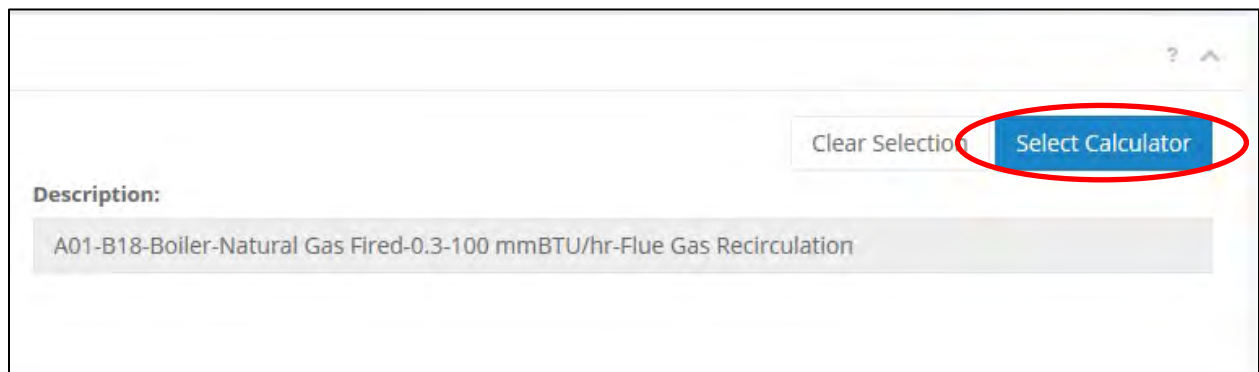


9. The user is then able to select which Portal inventory to migrate back into the Production Inventory



10. Once the data is migrated into Production the user can now verify data and hook up calculation methods for the inventory.

11. Select the appropriate Calc Method corresponding to the Permitted operation. This will be reflected in the title of the Facilities Data Request and the permit description. Click Select Calculator, the select from listed calc methods.



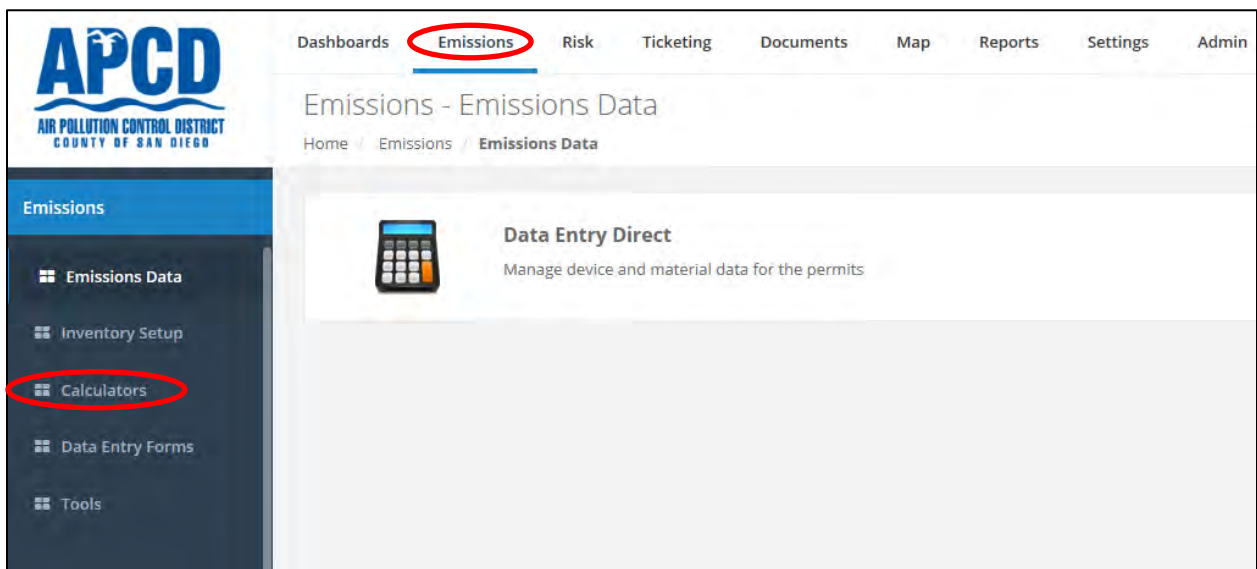
12. Scroll back up towards the Materials section and click **Save**.
13. Repeat steps 11 through 12 for each Material listed for the Facility.

Engineering Division Manual of Procedures

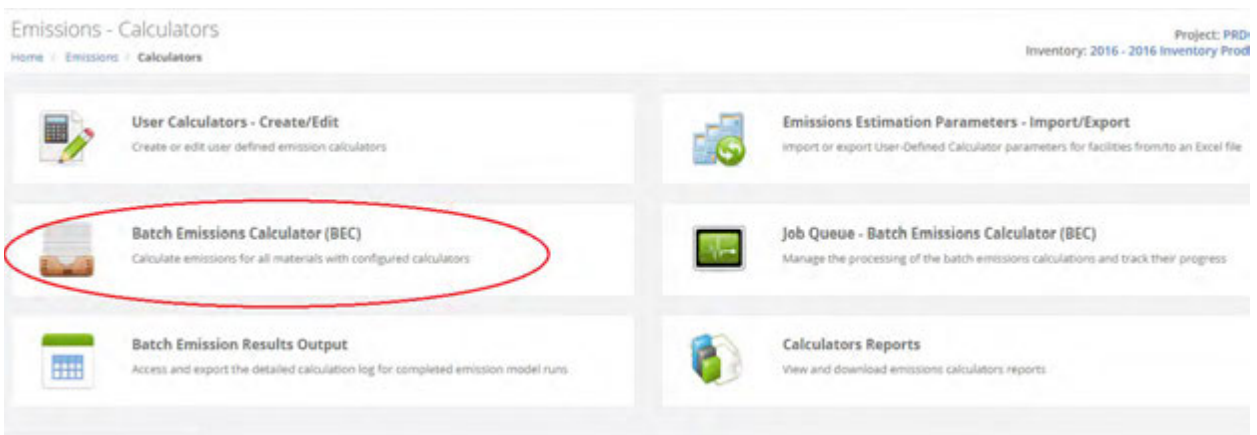
3) How to RUN FACILITY EMISSION CALCULATIONS

Basic knowledge of what the appropriate calculation(s) for each equipment / material is not discussed here. If you have any questions regarding this, please don't hesitate to get help from more experienced EI group members. All Calc Method information and equations are located in the District's Toxics page and can be found using the following link https://www.sdapcd.org/content/sdc/apcd/en/engineering/Permits/Engineering_Emissions_Inventory/Engineering_Phase_3_Toxics_Procedures.html. This will be required for having to QA the EIS batch calculation reports and Facility Emission Reports discussed below.

1. From the Emissions menu, click on Calculators icon on the left side of the menu.



2. From the selection of menu items, click on the Batch Emissions Calculation icon.



3. On Step 1/3, select the specific Facility you want to quantify emissions and run batch calculation and click Next.

Engineering Division Manual of Procedures

Step 1/3: Batch Emissions Calculator (BEC)

Facility Selection

Select the facility for which emissions will be calculated and imported.

Select Facilities:

96224

#	Facility Name	EID ID	SIC	NAICS	Street Address	City	Tags
1	<input type="checkbox"/> Minnesota Methane LLC North City Facility	96224	9511	562	4949 Eastgate Hall	San Diego	calculate plan and report; approved report

4. On Step 2/3, add a “notes” name:
 - a. Notes – Enter the Facility Name, followed by the Inventory Year and include the EID for the Facility so you can identify the batch calculation in Queue.Click Next when done.

Step 2/3: Batch Emissions Calculator (BEC)

BEC Output Settings

The Batch Emissions Calculator (BEC) allows you to calculate emissions for multiple facilities and for multiple processes in one easy step.

Unit of Measure - Criteria Pollutants:
TONS

Unit of Measure - Non-Criteria Pollutants:
POUNDS

Notes:

2015 (EID 96224) Minnesota Methane

5. On Step 3/3, review summary of criteria selected for Facility and click Finish. This will run the batch calculation for the Facility where you will be able to view the quantified emissions for the entire Facility in the Queue.

Engineering Division Manual of Procedures

Step 3/3: Batch Emissions Calculation



Select Summary

All Data is Complete. Press Finish.

Submitted On:
June 20, 2019, 14:04:08

Submitted By:
Travis Arciaga

Inventory Year:
2015 - 2015 Inventory Production

Calculation mode:
Emission units

Notes:
Minnesota Methane_2015 (EID 96224)

Units of Measure:
POUNDS

Criteria Units of Measure:
TONS



Emission Category:
Actual

Facility:
Minnesota Methane LLC North City Facility

6. Once the Facility has finished running the batch calculation, click on View Files for that Facility.

Queue - Batch Emission Calculation

Jobs ahead of my next job in the queue: 0

Enter search tags...  

#	Name	Notes
1	Batch Emission Calculation	Minnesota Methane 2015 (EID 96224)

☐ My Jobs ☒ All Jobs ☐ Current Inventory ☒ All Inventory



Message	Action
Finished	Delete View Files Resubmit

7. Here you will be able to view the Annual and Hourly Emissions for each Material listed for the Facility in an excel spreadsheet. To view Annual and Hourly Emissions, download the "Batch Emissions Calculations Excel file". From these spreadsheets, you can filter and sort emissions based on Permit #, Device, Material, or Pollutant.

Engineering Division Manual of Procedures

Job Files

Enter search tags...



#	Download	Description	File Name	Added On
1	Download	Spreadsheet	Sharp Coronado Hospital & Healthcare Center.xlsx	16-Mar-2021, 17:10:41

Point Location	Facility	Device	Material	Emission Period	Pollutant	Equation Term	Equation Expression	Term Value	Unit of Measure	Note	Calculation Method
San Diego County	Minnesota Methane LLC North	1960022	1 - LANDFILL GAS	ANNUAL	Nitrogen (ANNUAL_USAGE)			165.7	million ft3/year		A01-E11 - v1
San Diego County	Minnesota Methane LLC North	1960022	1 - LANDFILL GAS	ANNUAL	Nitrogen (EF)			58.15			A01-E11 - v1
San Diego County	Minnesota Methane LLC North	1960022	1 - LANDFILL GAS	ANNUAL	Nitrogen (MAX_HOURLY_USAGE)			425	ft3/min		A01-E11 - v1
San Diego County	Minnesota Methane LLC North	1960022	1 - LANDFILL GAS	ANNUAL	Nitrogen (CAPTURE_EFFICIENCY)			0	%		A01-E11 - v1
San Diego County	Minnesota Methane LLC North	1960022	1 - LANDFILL GAS	ANNUAL	Nitrogen (CAPTURE_EFFICIENCY)			100	%		A01-E11 - v1
San Diego County	Minnesota Methane LLC North	1960022	1 - LANDFILL GAS	ANNUAL	Nitrogen (AEF)		IF(EF > 0.0, ANNUAL_USAGE, 0)	0			A01-E11 - v1
San Diego County	Minnesota Methane LLC North	1960022	1 - LANDFILL GAS	ANNUAL	Nitrogen (HEF)		IF(EF > 0.0, MAX_HOURLY_USAGE, 0)	0			A01-E11 - v1
San Diego County	Minnesota Methane LLC North	1960022	1 - LANDFILL GAS	ANNUAL	Nitrogen (AED)		IF(EF > 0.0, ANNUAL_USAGE, 0)	9635.455			A01-E11 - v1
San Diego County	Minnesota Methane LLC North	1960022	1 - LANDFILL GAS	ANNUAL	Nitrogen (HED)		IF(EF > 0.0, MAX_HOURLY_USAGE, 0)	1.482825			A01-E11 - v1
San Diego County	Minnesota Methane LLC North	1960022	1 - LANDFILL GAS	ANNUAL	Nitrogen (AED_AND_AEF)		AED+AEF	9635.455			A01-E11 - v1
San Diego County	Minnesota Methane LLC North	1960022	1 - LANDFILL GAS	ANNUAL	Nitrogen (FinalValue)		AED_AND_AEF	9635.455	LB		A01-E11 - v1
San Diego County	Minnesota Methane LLC North	1960022	1 - LANDFILL GAS	ANNUAL	Nitrogen (Total Emissions)		Total Emissions	4.8177275	TON		A01-E11 - v1

4) How to QA EMISSIONS

Both Annual and Hourly Emissions from the Facility batch calculations will require QA versus the District approved calculation methods listed in the Toxics page using the following link:

https://www.sdapcd.org/content/sdc/apcd/en/engineering/Permits/Engineering_Emissions_Inventory/Engineering_Phase_3_Toxics_Procedures.html

1. To QA Annual and Hourly Emissions in the batch calculations, download the “Batch Emissions Calculations Excel file” spreadsheet located in the Job Files as shown above. This is called the Batch Emission Calculation (BEC) Report where all emissions are quantified for the given Facility.
2. Filter out by Calculation Method selecting one calc method at a time to QA to ensure that the emissions are quantified correctly in EIS. Then filter out by Equation Term column to view the Total Emissions. You will also be able to view all input parameters in the Equation Term column which should also be checked to ensure the data entries into the data request forms match what was entered into EIS.

Pollutant	Equation Term	Equation Expression	Term Value	Unit of Measure	Note	Calculation Method
Nitrogen Oxides (NOx)	Total Emissions	Total Emissions	4.8177275	TON		A01-E11 - v1
Carbon Monoxide (CO)	Total Emissions	Total Emissions	26.455662	TON		A01-E11 - v1
Sulfur Oxides (SOx)	Total Emissions	Total Emissions	0.608119	TON		A01-E11 - v1
Total Organic Gases (TOG)	Total Emissions	Total Emissions	1.5584085	TON		A01-E11 - v1
Total Particulates (TSP)	Total Emissions	Total Emissions	1.90555	TON		A01-E11 - v1
Particulate Matter (PM10)	Total Emissions	Total Emissions	1.90555	TON		A01-E11 - v1
Acetone	Total Emissions	Total Emissions	3.51284	LB		A01-E11 - v1
Acrylonitrile	Total Emissions	Total Emissions	2.88318	LB		A01-E11 - v1
Ammonia	Total Emissions	Total Emissions	0	LB		A01-E11 - v1
Benzene	Total Emissions	Total Emissions	1.29246	LB		A01-E11 - v1
Carbon Disulfide	Total Emissions	Total Emissions	0.38111	LB		A01-E11 - v1
Carbonyl Sulfide	Total Emissions	Total Emissions	0.24855	LB		A01-E11 - v1
Chlorobenzene	Total Emissions	Total Emissions	0.24855	LB		A01-E11 - v1
Chloroform	Total Emissions	Total Emissions	0.03314	LB		A01-E11 - v1
Chlorofluorocarbons	Total Emissions	Total Emissions	1.22618	LB		A01-E11 - v1
Dimethyl Sulfide	Total Emissions	Total Emissions	4.17564	LB		A01-E11 - v1
Ethyl Benzene	Total Emissions	Total Emissions	4.20878	LB		A01-E11 - v1
Ethylene Dichloride	Total Emissions	Total Emissions	0.34797	LB		A01-E11 - v1
Formaldehyde	Total Emissions	Total Emissions	22.3695	LB		A01-E11 - v1
Hexane	Total Emissions	Total Emissions	4.87158	LB		A01-E11 - v1
Hydrogen Chloride	Total Emissions	Total Emissions	1231.151	LB		A01-E11 - v1
Hydrogen Sulfide	Total Emissions	Total Emissions	10.40596	LB		A01-E11 - v1
Methylene Chloride	Total Emissions	Total Emissions	10.45567	LB		A01-E11 - v1
Methyl Ethyl Ketone	Total Emissions	Total Emissions	4.40762	LB		A01-E11 - v1

Engineering Division Manual of Procedures

3. To QA emission calculations, you can either use the District Toxics website (link above) and its calculation procedures or SharePoint QA Calc Spreadsheets using the following link
<https://sdcountycagov.sharepoint.com/sites/apcd/Engineering/SitePages/Home.aspx?RootFolder=%2Fsites%2Fapcd%2FEngineering%2FShared%20Documents%2FEmissions%20Inventory%2FCalculations&FolderCTID=0x012000EE39BA8F198AD74CB4B836087AAE73F3&View=%7BC34333F3%2DE384%2D44A8%2D860B%2DA667D1DB7A7F%7D>. The Districts Toxics website provides all reference information for each calculation method, so it is recommended that this be used in addition to the SharePoint Spreadsheets to gain a better understanding of all input parameters.
4. When QA'ing the BEC Report, its best to filter out each calculation method and spot QA its corresponding pollutant emissions. Once the calc method has been determined to be correct in calculating emissions, you can then filter out to the next calculation method on the batch emission spreadsheet until all emission calculations have been QA'd and are determined to be correct.

5) How to GENERATE A FACILITY WIDE EMISSIONS REPORT

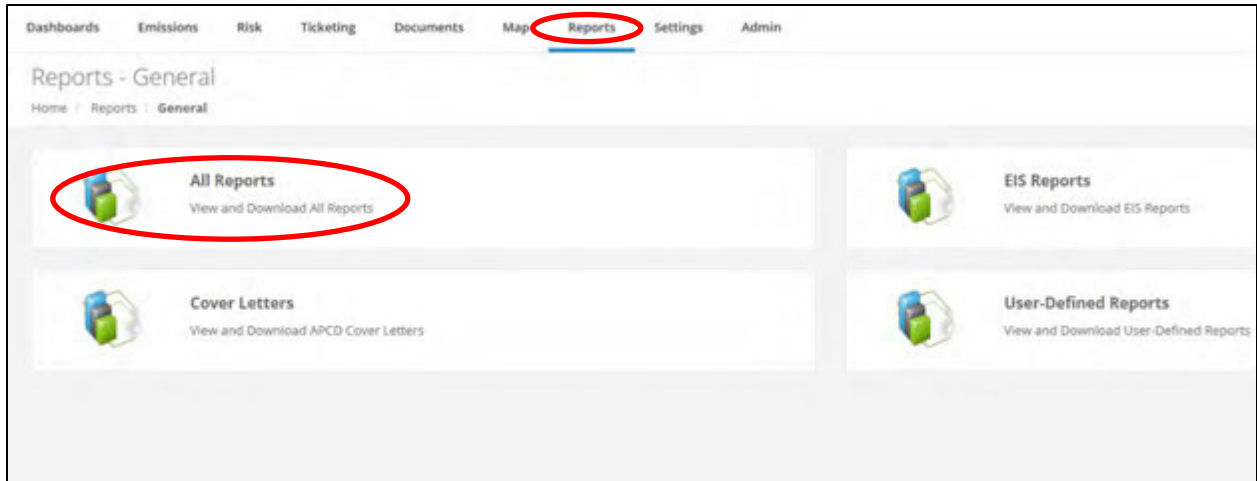
Once all the emission calculations from the Facility have been determined to be correct after the QA process, you will then be required to submit a Facility Wide Summary Emissions Report to the Facility, for their review and approval. This Report will include the following:

- A. Facility Wide Emission report with quantified Annual and Max Hourly emissions for both Criteria Pollutants (NO_x, SO_x, VOC, TOG, PM₁₀, TSP, and CO) and speciated Toxic Air Contaminants (TACs).
- B. Completed Data Request Forms which has the data that is entered into EIS for the Facility and compiled into one pdf document.
- C. Cover Letter (to be generated by APC Aide)
- D. Emission Statement if NO_x and/or VOC emissions are ≥25 tons/year.

Step A. – Facility Wide Emissions Report –

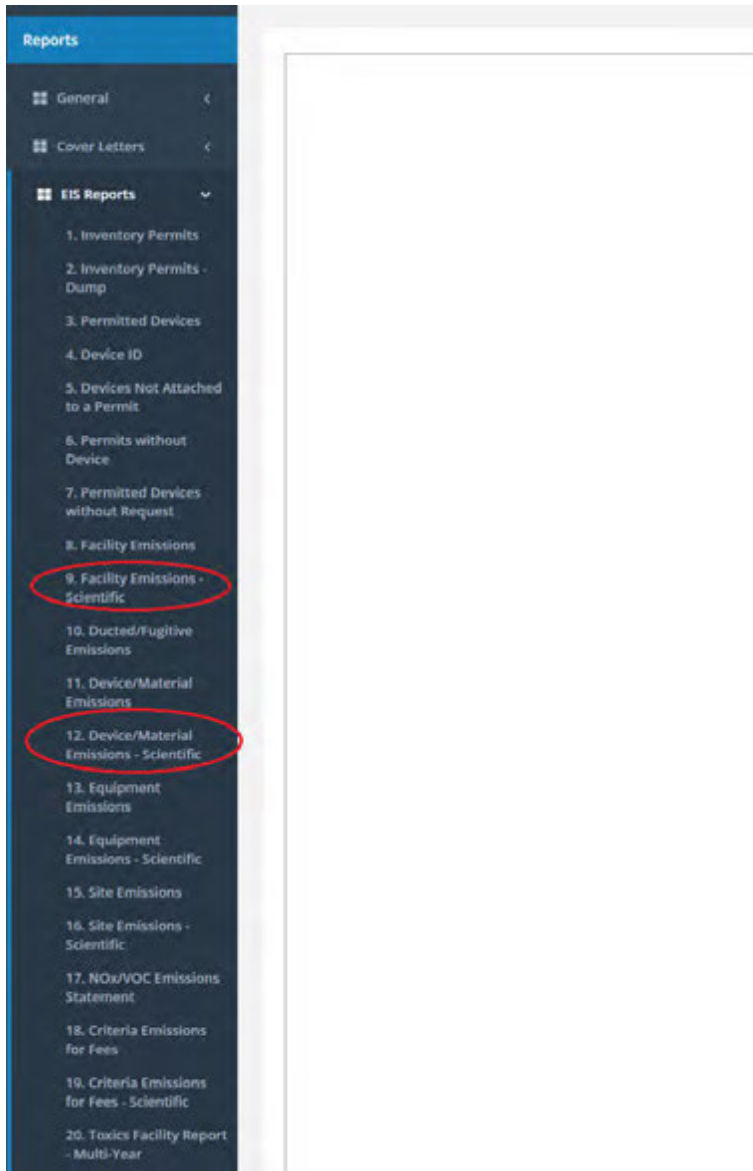
1. Click on the Reports link towards the top of the screen then click on All Reports.

Engineering Division Manual of Procedures



2. You either generate a report in numeric or scientific notation report. If the Facility has very low emissions of any pollutant, it is best to generate a report in scientific notation. The following example will use the scientific notation report. Click on 7. Facility Emissions Scientific.

Engineering Division Manual of Procedures



3. Enter the Facility Name or EID in the search box and then check the Selected box. Then Click Finish.

Engineering Division Manual of Procedures

Step 1/1: Facility Emissions - Scientific Wizard

Select Facilities

95165

#	Selected	Facility Name	EIF ID	Street Address	City	ZIP Code
1	<input checked="" type="checkbox"/>	Cobham Advanced Electronic Solutions Inc	95165	5785 Roscoe Ct	San Diego	92123

Total: 1

1 - 1 of 1

Page 1 of 1

20

Cancel Previous **Finish**

4. Once the report is generated, you can download and save in multiple formats (word, pdf, or excel). After downloading Report, QA the Annual and Max Hourly emissions versus what is in the BEC report. If there are any errors in the Facility Wide Report, follow the procedures in Section 6, Emissions Inventory Tracking.
5. If the Facility Wide Emissions Report is correct, save a copy onto SharePoint.

Step B. – Generating Completed Data Request Forms–

1. Click on Emissions, then click on Data Entry Forms on the left-hand side of the screen.

APCD
AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO

Dashboards **Emissions** Risk Ticketing Documents Map Reports Settings Admin

Emissions - Data Entry Forms

Home / Emissions / Data Entry Forms

Emissions

- Emissions Data
- Inventory Setup
- Calculators
- Data Entry Forms**
- Tools

Upload EIQ Spreadsheet
Import EIQ data from an Excel file

Download EIQ Spreadsheet
Export EIQ data to an Excel file

Download EIQ PDF Forms
Generate a PDF of completed and blank EIQ data forms

2. Select Facility by typing in name or EIF ID into the search box, then click Next.

Engineering Division Manual of Procedures

Step 1/2: Download EIQ Spreadsheet

Select Facility

05165

Facility Selection

Select the facility for which you wish to download Emissions Inventory Questionnaire (EIQ) data.

#	Facility Name	EIQ ID	Street Address	City	ZIP Code
1	Cobham Advanced Electronic Solutions Inc.	05165	15785 Roscoe Ct	San Diego	92123

1 - 1 of 1

Page 1 of 1

Cancel Previous Next

- Uncheck the box Export Required Fields as Blank and check the box Export File(s) as ZIP. Then check off all permits in the Air Permit Number column, then click Finish.

Step 2/2: Download EIQ Spreadsheet

Options:

☐ Export Required Fields as Blank

☒ Export File(s) as ZIP

Selected Facility: Cobham Advanced Electronic Solutions Inc.

Select Permits:

Export permits (0/0)

#	Selected	Air Permit Number	Version	Site Record ID	Permit Description
1	<input checked="" type="checkbox"/>	APCD000-PTD-91087	0	APCD099-0078-09252	Air aerospace coating operation, consisting of the following equipment: One (1) Air Management Systems (see more)
2	<input checked="" type="checkbox"/>	APCD000-PTD-91430	0	APCD099-0078-09252	One (2) ultrasonic conversion coating tank with a maximum capacity of 25 gallons processing aluminum (see more)
3	<input checked="" type="checkbox"/>	APCD000-PTD-91644	0	APCD099-0078-09252	Vapor degreaser/Manufacturer: Baron Blakeslee/Model: HLN-224/Serial: 62177/Dimensions: 41.0L x 18.0W (see more)
4	<input checked="" type="checkbox"/>	APCD000-PTD-91943	0	APCD099-0078-09252	VAPOR DEGREASER (x 5 90.0 FT 3) MANUFACTURER: BARON BLAKESLEE MODEL: HLN225 5% 10000 DIMENSIONS (see more)
5	<input checked="" type="checkbox"/>	APCD000-PTD-91943	0	APCD099-0078-09252	VAPOR DEGREASER (x 5 90.0 FT 3) MANUFACTURER: BARON BLAKESLEE MODEL: HLN225 5% 10000 DIMENSIONS (see more)
6	<input checked="" type="checkbox"/>	APCD000-PTD-91943	0	APCD099-0078-09252	VAPOR DEGREASER (450.0 FT 3) MANUFACTURER: BARON BLAKESLEE MODEL: HLN225 5% 10000 DIMENSIONS (see more)
7	<input checked="" type="checkbox"/>	APCD011-PTD-00337	0	APCD099-0078-09252	Vapor degreaser/Manufacturer: Baron Blakeslee/Model: HLN-224/Serial: 615788/Dimensions: 41" L x 18" W (see more)
8	<input checked="" type="checkbox"/>	APCD012-PTD-00338	0	APCD099-0078-09252	Photo-resist operation consisting of two series systems/Manufacturer: Zicon Model: 12000 Dimensions: (see more)
9	<input checked="" type="checkbox"/>	APCD012-PTD-00339	0	APCD099-0078-09252	One copper etch tank (20' x 20' x 10') using a solution of Ammonium Chloride and Ammonium Hydroxide (see more)



1 - 16 of 16

Page 1 of 1

Cancel Previous Finish

- This will prompt you to the Queue where you can download the completed Data Requests for the Facility. Once finished, click View Files and then click Download. Save pdf file to SharePoint. When viewing completed Data Request, QA versus what was entered into EIS to ensure the EIS data entries matchup with the data the Facility provided to the District. If any changes need to be made go back into the Emission Direct Data Entry and make the necessary corrections. Then click Resubmit the Data Request Queue to download a new pdf with the corrected data entries and re-run the emission calculations to ensure they are correct.

Engineering Division Manual of Procedures

Job Files					
Enter search tags...  					
#	Download	Description	File Name	Added On	Added By
1	Download	Zip Archive	EIQ_PDF_Cobham Advanced Electronic Solutions Inc.zip	03-Apr-2019, 17:14:22	Travis Arciaga

5. After completing Steps A and B, email the Toxics Senior Engineer (or their delegate) with either the two documents attached, or an indication where in SharePoint the documents are saved, for their review prior to moving to Step C. For facilities subject to a toxic emission inventory, also attach the prioritization scores (See Section 7).

Step C. – Cover Letter –

1. After the Facility Wide Report and Completed Data Requests have been reviewed and approved by the Senior Engineer (or their delegate), email both documents to the Toxics Section Aide with a short message stating that the Report is ready to be finalized and provided to the Facility. The Aide will prepare the draft Emissions Inventory Report letter for you to sign which will be mailed out and emailed (if an email address is available) to the Facility for their review. The letter will use the approved report letter template and list the attachment at the bottom. If a facility requires an Emission Statement, the letter will list it in the attachment and the full report must be mailed via certified mail. The template letter for TEI will include the draft prioritization scores, if any of the scores are above the threshold to require a Hot Spots health risk assessment. The letter will indicate that it is a draft for the facility's 30-day review.
2. Once the facility's comments (if any) are addressed, or if 30 days has past and the facility did not provide any comments, an approved Emissions Inventory Report letter will be created and sent to the facility indicating the inventory has been approved. If this is for a TEI and the prioritization scores are above the threshold to require a Hot Spots health risk assessment, the Aide will also prepare and send the Health Risk Assessment Required letter.

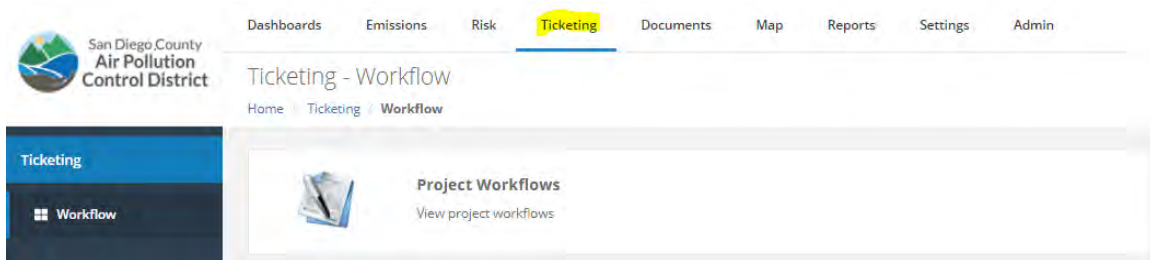
This will conclude the Emissions Inventory for that Facility.

Engineering Division Manual of Procedures

6) WORKFLOW TICKETING

Tracking Inventory Progress should be completed by utilizing the Ticketing module in EIS.

1. During the Emissions Inventory process, it is important to update the tasks assigned to each facility's workflow.
2. To access the Ticketing module click on "Ticketing" on the top menu of EIS.



3. Click on the Project Workflows to choose a specific inventory, within an inventory year

The screenshot displays the "Workflow Track" table within the EIS system. The table lists various projects and their associated tasks, along with the status of each task (Complete, In Progress, or Unassigned) and the number of work days remaining. The table is filtered by the "2015 - 2017 Inventory Progress" project. The table has columns for #, Project, Tasks, Principal, Complete Tickets, In Progress Tickets, Unassigned Tickets, and Work Days Remaining. The data is as follows:

#	Project	Tasks	Principal	Complete Tickets	In Progress Tickets	Unassigned Tickets	Work Days Remaining
1	General Dynamics RADSSCO	ce(a617 a(a617 a high score(a617 a(a617 report mailed	Unassigned	0	0	0	
2	Canyon Pools	ce(a617 a(a617 a high score/report mailed	Unassigned	0	0	0	
3	Cabrillo River LLC	ce(a617 a(a617 a ghg/report mailed	Unassigned	0	0	0	
4	5555 LP	a617 a(a617 a ghg/report mailed	Unassigned	0	0	0	
5	Yam Tashiro Center (Southwest)	ce(a617 a(a617 a ghg/report mailed	Unassigned	0	0	0	
6	Cypress View Cemetery	ce(a617 a(a617 a ghg/report mailed	Unassigned	0	0	0	
7	CR Kato	ce(a617 a(a617 a ghg/report mailed	Unassigned	0	0	0	
8	Donat Hills Cemetery Association	ce(a617 a(a617 a ghg/report mailed	Unassigned	0	0	0	
9	Hanson Aggregates Pacific Southwest Inc	ce(a617 a(a617 a ghg/report mailed	Unassigned	0	0	0	
10	Greenwood Memorial Park	ce(a617 a(a617 a ghg/report mailed	Unassigned	0	0	0	

Resolve tasks as they are completed, submitted completion dates in the past are not allowed and will need to be requested by Lakes. To assign tickets and save changes

Engineering Division Manual of Procedures

related to specific tickets, click on the ticket ID.

Project: 19 - General Dynamics NASCO

Tickets Assigned to Me: 31

Tickets: 2244 (From 140 Projects)

Workflow Track

Home / Ticketing / Workflow / Tickets

All Tickets

Enter search tags:

#	Ticket ID	Summary	Date Due	Date Complete	Assigned To	Link	Action
1	10	Inventory Setup	01-Jan-2020	14-Oct-2021	Archi dela Cruz		Resolve
2	24	Sync to Portal	01-Jan-2020	01-Jan-2020	Russell K. Yanagihara		Assign
3	15	Send Data Request Letter	22-Mar-2021	22-Mar-2021	Russell K. Yanagihara		Assign
4	10	Data Request Extension	22-Mar-2021	22-Mar-2021	Russell K. Yanagihara		Assign
5	27	Emission Inventory Electronic Submission	01-May-2021	27-Apr-2021	Russell K. Yanagihara		Assign
6	38	Review & Compute Emissions	15-Jul-2021		Russell K. Yanagihara		Assign
7	29	Senior Review	27-Oct-2021		Jonya Lofgren		Assign
8	30	Send out Draft Report	14-Oct-2021		Archi dela Cruz		Assign

1 - 14 of 14

Overdue Tickets

Enter search tags:

#	Ticket ID	Summary	Date Due	Date Complete	Assigned To	Link	Action
1	10	Send out Draft Report	14-Oct-2021		Archi dela Cruz		Resolve
2	11	Prioritization Scores	27-Oct-2021		Russell K. Yanagihara		Assign
3	10	Revision Requested	27-Oct-2021		Russell K. Yanagihara		Assign
4	10	Revised Review & Compute Emissions	27-Oct-2021		Russell K. Yanagihara		Assign
5	31	Revised Prioritization Scores	27-Oct-2021		Russell K. Yanagihara		Assign
6	35	Revised Senior Review	27-Oct-2021		Russell K. Yanagihara		Assign
7	36	Send our revised draft report	27-Oct-2021		Russell K. Yanagihara		Assign

1 - 7 of 7

Tracking Errors using EIS Bug Tracker

1. All errors or bugs that are found while using EIS should be reported using the EIS Bug Tracker website

http://bugtracker.weblakes.com/login_page.php?return=%2Fview_all_bug_page.php.

2. Login using your Bug Tracker login information.

Lakes Software

Login

Login

3. Click on Report Issue.

Engineering Division Manual of Procedures

The screenshot shows the 'Lakes Bug Tracker' interface. On the left sidebar, the 'Report Issue' button is highlighted with a red circle. The main area is titled 'Enter Issue Details' and contains the following fields:

- *Category: (select) dropdown
- Reproducibility: have not tried dropdown
- Severity: minor dropdown
- Priority: normal dropdown
- Select Profile: (select) dropdown
- Product Version: dropdown
- Assign To: dropdown
- Target Version: dropdown
- *Summary: text input
- *Description: text input

4. Use the dropdown boxes to select the appropriate details regarding the type of error you are experiencing. For example, for reporting errors (EIS Reporting feature), select the following:
 - a. Category – Reports
 - b. Reproducibility – if this is a consistent problem, select Always, otherwise choose a different option
 - c. Severity – if there a significant issue in EIS, mark this area as Major, otherwise choose from the other options as appropriate.
 - d. Priority – Choose Normal unless it needs urgent attention
 - e. Select Profile – Select based on the internet platform you are using or skip this section.
 - f. Product Version – ignore this section
 - g. Assign To – All EIS errors should be assigned to “lakes_mike” (Mike Johnson).
 - h. Target Version – ignore this section
 - i. Summary – provide a brief summary title of the error
 - j. Description – Provide a detailed but brief description of the error
 - k. Steps to Reproduce – ignore this section
 - l. Additional Information – ignore this section
 - m. Attach Tags – its **HIGHLY** recommended you attach what errors you are experiencing whether it’s with reporting or calculations. For the tag, give the attached error document a brief name. Its best to identify the inventory year, Facility name, and EID so it can be quickly resolved by Lakes.
 - n. Requires documentation – select Yes
 - o. Upload Files – drop attached error file in the drop section

Engineering Division Manual of Procedures

Enter Issue Details	
*Category	Reports
Reproducibility	always
Severity	minor
Priority	normal
Select Profile	(select)
Product Version	Or Fill In
Assign To	lakes_mike
Target Version	
*Summary	Facility Wide Report not including Cumene in the TAC list
*Description	Cumene is not included in TAC list when generating Facility Wide Report for <u>Cobham</u> (EID 95165) in 2015

5. Click Submit Issue and monitor the progress of the issue by Lakes. Lakes will send out an email to the user that submitted the error via Bug Tracker with information on the status of the error.

Engineering Division Manual of Procedures

7) HOW TO CALCULATE FACILITY WIDE PRIORITIZATION SCORES

For facilities subject to a Toxic Emission Inventory (tagged “tei” and subject to the Air Toxics “Hot Spots” Program, AB2588), and other facilities the District wants to determine if they would impact their communities for which their toxic emissions have been calculated (such as facilities within the Portside Environmental Justice Area), prioritization scores will be calculated, while compiling the Report for the Facility, to determine whether a Health Risk Assessment (HRA) will be required for the Facility. Prioritization scores do NOT take into account Criteria Pollutants (NO_x, VOC, TOG, SO_x, TSP, PM₁₀), therefore only Toxic Air Contaminants will be quantified for Prioritization.

A. Development & Updating EIS Pollutant Table and Health Data

Per AB2588, Emission Inventory Criteria and Guidelines (EICG) for the “Hot Spots” Program, the District is required to prepare emission inventories for facilities which emit TACs. Appendix A of the EICG and the District’s Rule 1200 establish which pollutants need to be inventoried. To be included in creation of prioritization scores, pollutants must be assigned health values including type and rate of toxicity. Health data has been established from several different organization and sources, including California’s Office of Environmental Health Hazard Assessment (OEHHA). CARB and OEHHA regularly adopt new pollutants to be inventories and new health values when data becomes available. The EIS pollutant table should be updated to include newly adopted pollutants and health values after regulatory amendments are final or advised by CARB and/or OEHHA. ARB continually updates and presents the adopted pollutants and health values on the Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values⁸

- a. Pollutant Flags - Each pollutant within EIS is assigned pollutant flags in order to calculate emissions and prioritization scores accurately. Each pollutant is assigned a True (T) or False (F) tag for each of the following categories. Note a ‘NULL’ or blank flag will result in a calculation error for the selected calculation method.
 - i. VOLATILE_FLAG – assigned to a pollutant if it is a volatile organic compound (VOC)
 - ii. ROG_FLAG – assigned to a pollutant if it is a reactive organic compound
 - iii. EXEMPT_SOLVENT_FLAG - assigned to a pollutant if it is an exempt solvent per District Rule 2, Rule 11 and Rule 66.1
 - iv. TOXIC_COMPOUND – assigned to a pollutant if it is a toxic compound
 - v. PARTICULATE_FLAG – assigned to a pollutant if it, or its byproduct, is a particulate emission and not a VOC

⁸ <https://ww2.arb.ca.gov/resources/documents/consolidated-table-oehha-carb-approved-risk-assessment-health-values>

Engineering Division Manual of Procedures

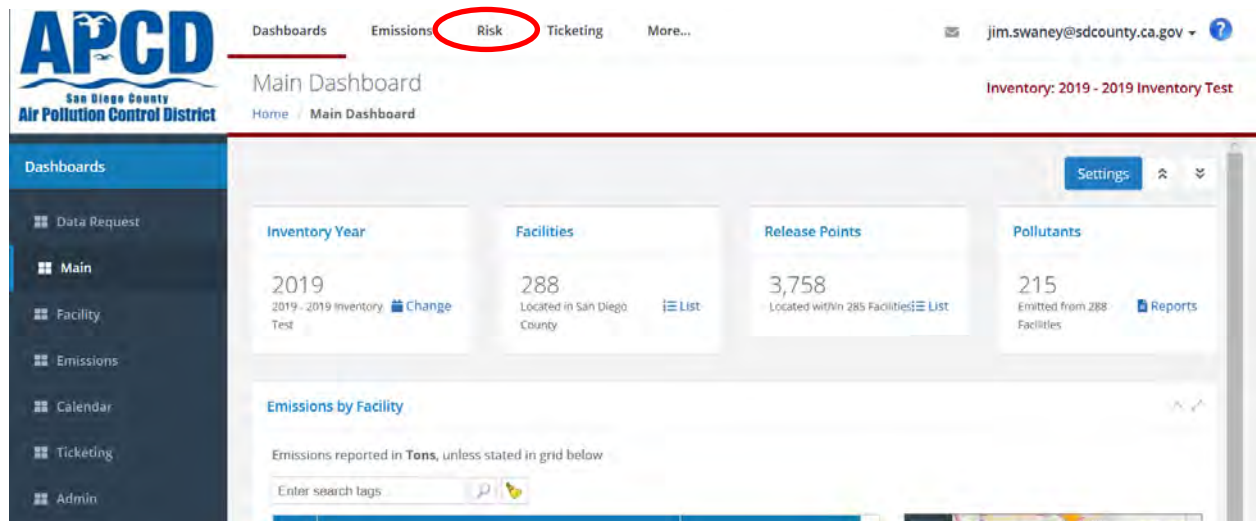
Use the following District guideline as a reference for understanding Prioritization procedures for the Air Toxics Hot Spots Program (AB2588):

https://www.sdapcd.org/content/dam/sdc/apcd/PDF/Toxics_Program/APCD_Air_Toxics_Hot_Spots_Prioritization_Procedures.pdf

A. Initial Prioritization Run

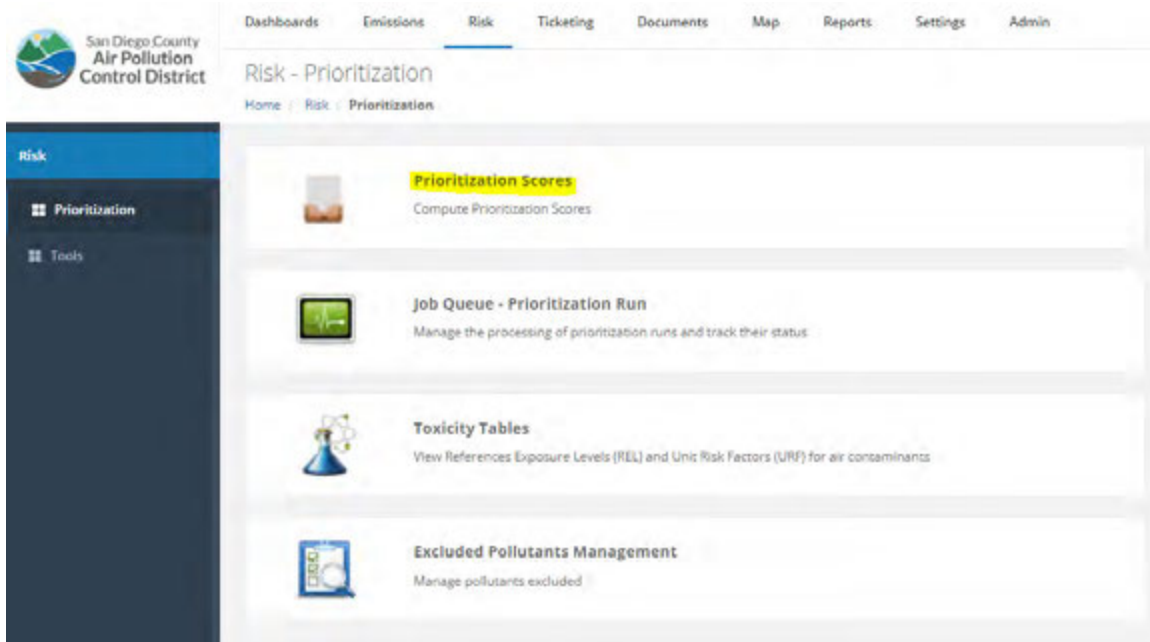
For purposes of determining the prioritization scores at the time of the draft inventory (per Section 5. Step c.1, above). If the results from the initial run indicate a HRA is needed, facilities may provide additional information that could affect the scores, then the additional information should be added in the appropriate run to see if a HRA is still indicated or not. These adjustments are typically in the form of a revised emission inventory called a refined acute scenario.

1. Click on the Risk link towards the top of the screen.

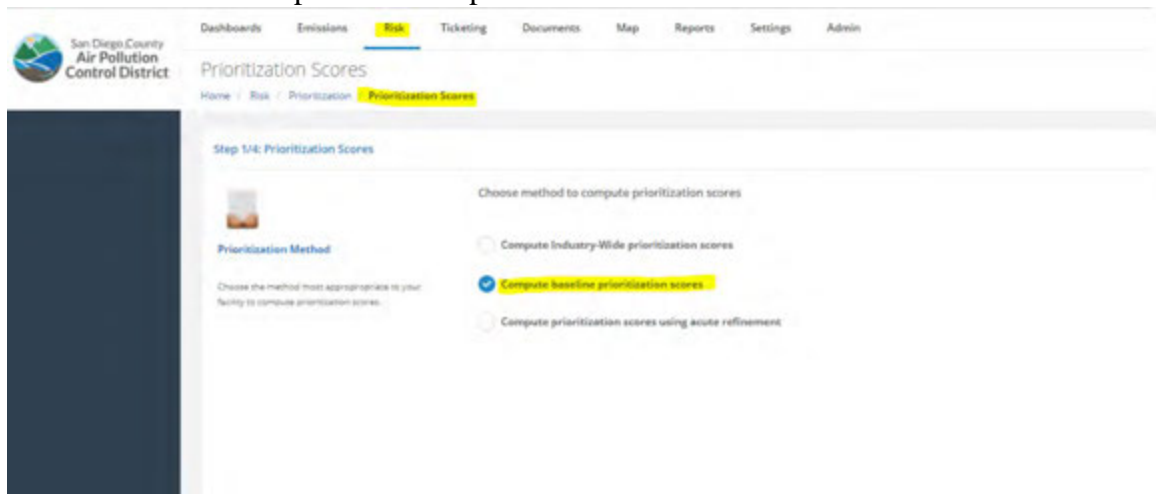


2. Select Prioritization Scores

Engineering Division Manual of Procedures



3. On the next screen, is a field to name the prioritization scenario. Use the format “Inventory Year, EID ####, Facility Name” to name prioritization runs. There is also a check box to indicate if you want to include criteria emissions in the HHRP (Prioritization) Report – typically this is not needed, except in a specific situation⁹. Select Compute baseline prioritization scores.



- 4.
5. Receptor Distances

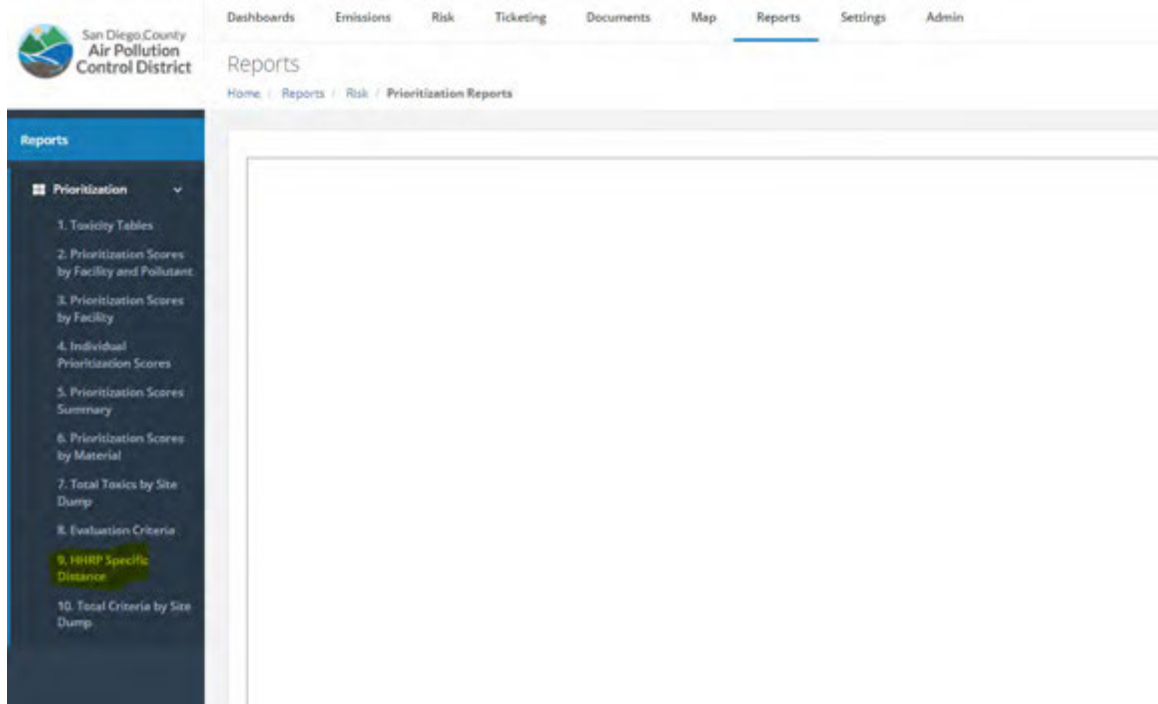
One of the factors considered when prioritizing facilities is the receptor distance.

- Receptor Distances equal to or Great Than 50 Conservative receptor distances will be applied, as described per the District’s Prioritization Procedures. Distance

⁹ Facilities that report zero usage for all devices within an inventory year, criteria pollutants must be included in the prioritization run in order to indicate the facility’s scores were reviewed. This will require that emissions have been calculated for at least one device/material for the facility for the criteria pollutants (they will show as zero emissions).

Engineering Division Manual of Procedures

should be estimated on Google Earth, from facility to closest receptor. KMZ files showing the distances should be saved in the facility's respective SharePoint folder. Facilities can request to adjust distances by providing more detailed information, such as PFDs and site-maps. A HHRP Specific Distance report should be provided with every Draft TEI report so the facility can review the conservative distances that were applied.



6. On the next screen, , select the facility either by scrolling and highlighting it, or by using the search box using either the Facility Name or EIF ID. Check the box next to the facility and click Next.

-327-

Engineering Division Manual of Procedures

8. The next screen, will show your selections. If any selections need to be changed, click Previous to change them, or click Finish to run the prioritization scores.

APCD San Diego County Air Pollution Control District

Dashboards Emissions Risk Ticketing Documents More...

jim.swaney@sdcounty.ca.gov

Prioritization Run

Home / Risk / Prioritization / Prioritization Run

Inventory: 2019 - 2019 Inventory Test

Step 3/3: Prioritization Run

Summary

Review the options you selected and press the Finish button.

Scenario Name:
2019, EID 19, NASSCO Prioritization Score - 09-Mar-2021

Toxicity Table:
Master Exposure Table - 2020-12-16

Facility Selection:
All Facilities

Receptor Distance - Standard (m):
50

Receptor Distance - Acute (m):
50

Use Refined Distances:
Yes

Plot Scores:
Yes

Evaluate Criteria Pollutants:
No

Cancel Previous Finish

9. The Job Queue – Prioritization Run screen will appear (you can also access this screen from the main Risk screen). Here you can see the progress of the run. Once the run is finished, you can see the HHRP spreadsheet by clicking on files, then Download the HHRP log.

Engineering Division Manual of Procedures

APCD San Diego County Air Pollution Control District

Dashboards Emissions Risk Ticketing Documents More...

Prioritization Run

Home Risk Prioritization Job Queue - Prioritization Run

Inventory: 2019 - 2019 Inventory Test

User: All Jobs Inventory: All

Stop Refreshing

#	Job Type	Notes	Submitted On	Submitted By	Inventory Year	Status	Messages	Actions
1	<input type="checkbox"/> Prioritization Run	2019, EID 19, NASSCO Prioritization Score - 09-Mar-2021	08-Mar-2021, 21:40:44	Jim Swaney	2019 - 2019 Inventory Test	Complete/Finished		History Files Resubmit
2	<input type="checkbox"/> Prioritization Run	All 2017 facilities Prioritization Score - 02-Dec-2020 [Resubmitted]	02-Mar-2021, 08:21:38	Mike Johnson	2017 - 2017 Inventory Test	Complete/Finished		History Files Resubmit
3	<input type="checkbox"/> Prioritization Run	2nd run	16-Feb-2021, 08:02:34	Mike Johnson	2017 - 2017 Inventory Test	Complete/Finished		History Files Resubmit
4	<input type="checkbox"/> Prioritization Run	Prioritization Score - 13-Feb-2021	13-Feb-2021, 10:42:31	Mike Johnson	2017 - 2017 Inventory Test	Complete/Finished		History Files Resubmit
5	<input type="checkbox"/> Prioritization Run	Prioritization Score - 21-Jan-2021 [Resubmitted]	13-Feb-2021, 10:30:44	Mike Johnson	2017 - 2017 Inventory Test	Complete/Finished		History Files Resubmit
Total: 0								

1 - 20 of 515 Page 1 of 26 20

APCD San Diego County Air Pollution Control District

Dashboards Emissions Risk Ticketing Documents More...

Prioritization Run

Inventory: 2019 - 2019 Inventory Test

Job Files

Enter search tags...

#	Download	Description	File Name	Added On	Added By	Notes
1	Download	Spreadsheet	HHRP_Summary.csv	08-Mar-2021, 21:41:38	Jim Swaney	
2	Download	Spreadsheet	HHRP_Log.xlsx	08-Mar-2021, 21:41:44	Jim Swaney	

1 - 2 of 2 Page 1 of 1 20

Close

The HHRP spreadsheet shows the facility wide prioritization scores as well as the contributions from each toxic air contaminant for each device and material for each risk type (cancer risk, chronic risk and acute risk), the TAC emissions, and the distances used (residential, worker, acute).

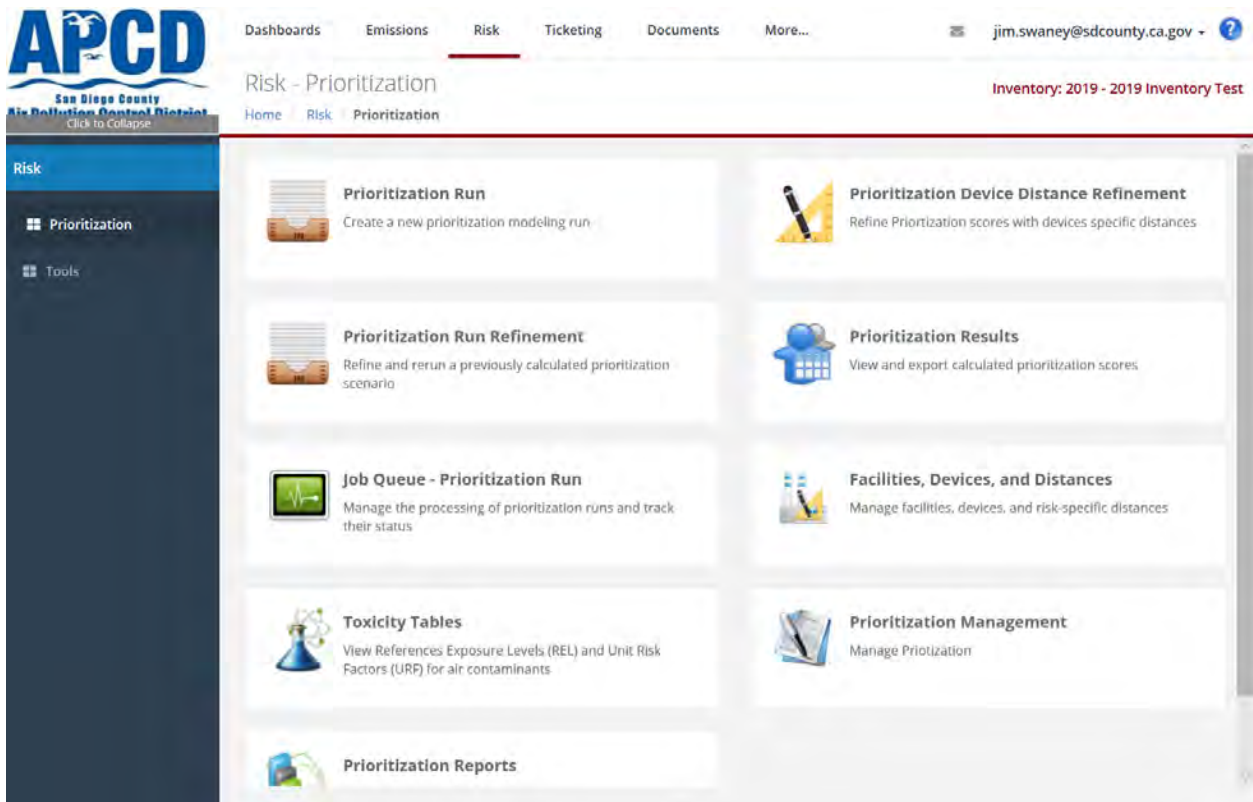
	A	B	C	D	E	F	G	H	I	J
1	EIF ID	Facility Na	Worksheet	Cancer	Chronic	8-Hour	Acute	Default Dis	Default Acute	Distance
2	19	General Dy 1 - Refined		3799.594	123.2345	124.1	258.4645			
3										
4	Project:	2019 - 2019 Inventory		3799.594	123.2345	124.1	258.4645			

B. Acute Scenarios

- 330-

Engineering Division Manual of Procedures

- this). For a coating operation within a booth where only one coating is applied at one time, select the coating that gives the highest score, and exclude the other coatings. For facility-wide devices (such as welding or solvent usage), care must be taken to ensure the facility's proposed scenario includes all the activities that can be done within the same hour. For example, it is not enough to select the one welding rod that yields the highest score unless it can be demonstrated that the hourly usage for that rod is the total hourly welding usage for the entire facility. Note that if an acute device distance will be used, a Distance Refinement run using that distance must be run before the acute scenario is run.
2. Once the acute scenario is determined, then select the Prioritization Run Refinement option from the main Risk screen.



3. A list of past prioritization runs will appear – select the run that will be used as the base run (whether it be an initial run or a distance refined run) and select Next.

Engineering Division Manual of Procedures

APCD
San Diego County
Air Pollution Control District

Dashboards Emissions **Risk** Ticketing Documents More...

Prioritization Run Refinement

Home Risk Prioritization Prioritization Run Refinement

Inventory: 2019 - 2019 Inventory Test

Step 1/4: Prioritization Run Refinement

Select a Prioritization Run:

Enter search tags...

Prioritization Run Selection

Select a Prioritization Run that you want to refine:

#	Scenario Name	Created By	Created On	Toxicity Table	Standard Distance [m]	Acute Distance [m]
1	2019 EID 19 NASSCO Distance Refinement Prioritization Score - 09-Mar-2021	Jim.Swaney@sdcounty.ca.gov - Jim Swaney	09-Mar-2021	Master Exposure Table - 2020-12-16	50	50
2	2019 EID 19 NASSCO Prioritization Score - 09-Mar-2021	Jim.Swaney@sdcounty.ca.gov - Jim Swaney	09-Mar-2021	Master Exposure Table - 2020-12-16	50	50
3	2019, EID 19, NASSCO Prioritization Score - 09-Mar-2021	Jim.Swaney@sdcounty.ca.gov - Jim Swaney	09-Mar-2021	Master Exposure Table - 2020-12-16	50	50
4	Prioritization Score - 28-Dec-2020	Russell.Yanagihara@sdcounty.ca.gov - Russell K. Yanagihara	28-Dec-2020	Master Exposure Table - 2020-12-16	50	50
5	Prioritization Score - 28-Dec-2020	Russell.Yanagihara@sdcounty.ca.gov - Russell K. Yanagihara	28-Dec-2020	Master Exposure Table - 2020-12-16	50	50
6	Prioritization Score - 02-Dec-2020	Archi.delaCruz@sdcounty.ca.gov - Archi dela Cruz	02-Dec-2020	Master Exposure Table - 2019-11-21	50	77.7
7	TEI 2019 Eternal Hills Cemetery (EIF ID 131) Prioritization Score - 02-Dec-2020	Archi.delaCruz@sdcounty.ca.gov - Archi dela Cruz	02-Dec-2020	Master Exposure Table - 2019-11-21	50	50
8	2019 556 Robertson Ready Mix	Archi.delaCruz@sdcounty.ca.gov	14-Sep-	Master Exposure	50	50

1 - 20 of 38 Page 1 of 2 20

Cancel Previous Next

- On the next screen, a list of all the facility's devices is shown. Select a device that has materials to be excluded (engines, coatings, welding rods, etc.), and the list of materials for that device will appear. Check all the materials that will be excluded, ensuring the material to be included is not checked. Go through all the devices that have an exclusion, then select Next.

For devices which will be excluded (like diesel engines):

Engineering Division Manual of Procedures

APCD
San Diego County
Air Pollution Control District

Dashboards Emissions **Risk** Ticketing Documents More...

Prioritization Run Refinement

Home Risk Prioritization Prioritization Run Refinement

Inventory: 2019 - 2019 Inventory Test

Step 2/3: Prioritization Run Refinement

EIF ID: 19
Company Name: General Dynamics NASSCO

Enter search tags.

Materials Exclusion

Select the materials that should be excluded from the Prioritization Run Refinement.

#	Site Reco ID	Air Permit Number	Permit Description	Devic ID	Device Description
15	APCD SITE-00145	APCD2010-PTO-000550	Emergency Engine: John Deere, Model 6068HF485, 315 BHP, diesel fired, turbocharged S/N PE6068L0621 see more >	550	3.6 sec more > SAME AS PERMIT DESCRIPTION EMISSION FACTORS USED NMHC+NOX 3.4, CO 0.6, PM 0.11 PER G/KW-HR PER AQS see more >

Blast Cell #1: Custom marker

1 - 20 of 98 Page 1 of 5 20

Cancel Previous Next

Excluded Materials:

☒ 1 - DIESEL

Reasons to Exclude:

For devices where certain materials will be excluded (like welding and coating operations):

APCD
San Diego County
Air Pollution Control District

Dashboards Emissions **Risk** Ticketing Documents More...

Prioritization Run Refinement

Home Risk Prioritization Prioritization Run Refinement

Inventory: 2019 - 2019 Inventory Test

Step 2/3: Prioritization Run Refinement

EIF ID: 19
Company Name: General Dynamics NASSCO

Enter search tags.

Materials Exclusion

Select the materials that should be excluded from the Prioritization Run Refinement.

#	Site Reco ID	Air Permit Number	Permit Description	Devic ID	Device Description
1	APCD SITE-00145	0	NON-PERMITTED DEVICES	0	WELDING OPERATIONS (NASSCO)
2	APCD SITE-00145	0	NON-PERMITTED DEVICES	1	WELDING OPERATIONS (SUBCONTR)
3	APCD SITE-00145	0	NON-PERMITTED DEVICES	3	ADHESIVE OPERATIONS (SUBCONTR)
4	APCD SITE-00145	0	NON-PERMITTED DEVICES	15	NON-PERMITTED ABRASIVE BLASTING PERFORMED IN BLAST CABINET, CARB REGISTERED

1 - 20 of 98 Page 1 of 5 20

Cancel Previous Next

Excluded Materials:

☒ 1 - 101 TC GMAW

☒ 2 - 11018 SMAW

☒ 3 - 308 TIG

☒ 4 - 309 GMAW

☒ 5 - 309 TIG

☐ 6 - 316L GMAW

☒ 7 - 5356 GMAW

☒ 8 - 70-S TIG

☒ 9 - 7018 SMAW

10 - 71T GMAW

Engineering Division Manual of Procedures

5. There is not an option to name the scenario, so on the next screen select Finish to run the scenario.

The screenshot shows the APCD (Air Pollution Control District) web application interface. The top navigation bar includes links for Dashboards, Emissions, Risk (which is highlighted), Ticketing, Documents, and More... The user is logged in as jim.swaney@sdcounty.ca.gov. The main heading is 'Prioritization Run Refinement'. Below this, there is a breadcrumb trail: Home > Risk > Prioritization > Prioritization Run Refinement. The page is titled 'Step 3/3: Prioritization Run Refinement'. On the left, there is a 'Summary' section with a 'Review the options you selected and press the Finish button.' instruction. On the right, the 'Prioritization Run' details are shown: '2019 EID 19 NASSCO Distance Refinement Prioritization Score - 09-Mar-2021'. The 'Facility' is 'EIF ID 19 General Dynamics NASSCO'. The 'Excluded Materials' are listed as '9'. At the bottom right, there are three buttons: 'Cancel', '< Previous', and 'Finish'.

6. Once Finish is clicked, you will be sent to the Job Queue – Prioritization Run screen as discussed in step A6 above.
 7. District guidelines require facilities perform an HRA with an A prioritization grade (cancer score > 100, chronic or acute score > 10 (HRA currently not required if the only score > 10 is for 8-hour)). B graded facilities (cancer score between 1 and 100, chronic or acute score between 1 and 10) may be required to perform an HRA on a case-by-case basis. C graded Facilities (scores below 1) will not be required to perform an HRA. After completion, include the scores and the HHRP file in the email to the Toxics Senior Engineer (as described in Section 5, Step B.5.).
- C. Specifying the final prioritization scores
1. Once all refinements have been applied and the scores finalized, go to the Prioritization Management option from the main Risk screen to indicate which prioritization run shows the final scores. All scores should be finalized or 'locked' before sending Draft emission inventories to Senior for review and before resolved the Prioritization Score task in workflow.

Engineering Division Manual of Procedures

The screenshot shows the APCD Risk - Prioritization dashboard. The left sidebar has a 'Risk' section with 'Prioritization' and 'Tools' options. The main content area displays several cards for different prioritization tasks:

- Prioritization Run**: Create a new prioritization modeling run.
- Prioritization Run Refinement**: Refine and rerun a previously calculated prioritization scenario.
- Job Queue - Prioritization Run**: Manage the processing of prioritization runs and track their status.
- Toxicity Tables**: View References Exposure Levels (REL) and Unit Risk Factors (URF) for air contaminants.
- Prioritization Reports**: View and export calculated prioritization scores.
- Prioritization Device Distance Refinement**: Refine Prioritization scores with devices specific distances.
- Prioritization Results**: View and export calculated prioritization scores.
- Facilities, Devices, and Distances**: Manage facilities, devices, and risk-specific distances.
- Prioritization Management**: Manage Prioritization.

2. Select the facility (by clicking Select in the Action column) and scroll down to see the various prioritization runs that have been done for that facility.

The screenshot shows the APCD Prioritization Management page. The top section displays a summary of facilities:

Total Facilities	Facilities Run	Facilities Final	Percent Complete
288	32	0	0.00%

Below the summary is a table of prioritization runs for selected facilities. The table has columns for #, EIF ID, Facility Name, Tags, Run, Final, Scenario Name, Phase, Date Approved, Approved By, and Action.

#	EIF ID	Facility Name	Tags	Run	Final	Scenario Name	Phase	Date Approved	Approved By	Action
9	168	Greenwood Memorial Park	cei tei	NO	NO					
10	171	Grossmont District Hospital	ab617 ei ab617 ei ghg report mailed	NO	NO					
11	1795	Solar Turbines Inc	cei ab617 ei ab617 ei ghg ab617 ei high score report mailed	NO	NO					
12	19	General Dynamics NAASCO	cei ab617 ei ab617 ei high score ab617 portside report mailed	YES	NO					Select
13	1968	Chevron USA Inc	ab617 ei ab617 portside report	NO	NO					

Engineering Division Manual of Procedures

3. Select the exact prioritization run and select if this is from uniform or refined distances in the drop-down box, then click Select.

The screenshot displays the APCD (Air Pollution Control District) Prioritization Management interface. The top navigation bar includes links for Dashboards, Emissions, Risk, Ticketing, Documents, and More... The user is logged in as jim.swaney@sdcounty.ca.gov. The main heading is "Prioritization Management" with a sub-header "Inventory: 2019 - 2019 Inventory Test".

Below the heading, there is a breadcrumb trail: Home > Risk > Prioritization > Prioritization Management. A table lists prioritization runs for facility "197600194 SD Galvanizing Inc". The table has columns for ID, Name, Status, and a "Select" button. The first row is selected.

Below the table, the "Run Details" section is visible. It shows the EID (19) and Facility (General Dynamics NASSCO). A search tag input field is present. Below this is a table of prioritization runs with columns: #, Select, Scenario Name, Run Phase, and Created On.

#	Select	Scenario Name	Run Phase	Created On
1	<input checked="" type="checkbox"/>	2019, EID 19, NASSCO Prioritization Score - 09-Mar-2021		08-Mar-2021, 21:40:43
2	<input type="checkbox"/>	2019 EID 19 NASSCO Prioritization Score - 09-Mar-2021		08-Mar-2021, 22:25:07
3	<input type="checkbox"/>	2019 EID 19 NASSCO Distance Refinement Prioritization Score - 09-Mar-2021		08-Mar-2021, 22:43:43
4	<input type="checkbox"/>	Refined-2019 EID 19 NASSCO Distance Refinement Prioritization Score - 09-Mar-2021	<div>Uniform Refined</div>	08-Mar-2021, 23:06:11

At the bottom right, there are "Clear" and "Select" buttons.

4. After you have clicked Select you will see a check mark next to the selected run. The selected run will be used by the various prioritization reports in EIS and will be used to determine if a HRA is required or not.

Engineering Division Manual of Procedures

The screenshot shows the APCD (Air Pollution Control District) web application. The top navigation bar includes links for Dashboards, Emissions, Risk (selected), Ticketing, Documents, and More... The user is logged in as jim.swaney@sdcounty.ca.gov. The main heading is "Prioritization Management" with a sub-header "Inventory: 2019 - 2019 Inventory Test". The left sidebar shows "Prioritization Management" and "Dashboard". The main content area displays a table of prioritization runs for facility "General Dynamics NASSCO".

#	Select	Scenario Name	Run Phase	Created On
1		2019, EID 19, NASSCO Prioritization Score - 09-Mar-2021		08-Mar-2021, 21:40:43
2		2019 EID 19 NASSCO Prioritization Score - 09-Mar-2021		08-Mar-2021, 22:25:07
3		2019 EID 19 NASSCO Distance Refinement Prioritization Score - 09-Mar-2021		08-Mar-2021, 22:43:43
4	<input checked="" type="checkbox"/>	Refined-2019 EID 19 NASSCO Distance Refinement Prioritization Score - 09-Mar-2021	Refined	08-Mar-2021, 23:06:11

At the bottom right of the interface are "Clear" and "Select" buttons.

16. Toxics “Hot Spots” Procedures (December 2020-M Luther, Rev. Jan 2021-M Luther, Rev. March 5, 2021, Rev. May 2021, Rev. October 2021, Rev. December 2021, Rev. March 2022)

The work related to the Hot Spots Health Risk Assessment and associated public notification and risk reduction requirements must be captured under a HRA Record in BCMS.

I. Creating a HRA Record – Emission Inventory Aide

Once the Emission Inventory is approved and the prioritization score indicates a Health Risk Assessment (HRA) is required under AB2588, the aide assigned to the Emission Inventory team will create a HRA record in BCMS as follows:

1. Select the SITE record for the facility that is subject to the HRA requirement, click on the “related record” tab, and then “clone mult”.

Engineering Division Manual of Procedures

APCD1998-SITE-10382 County of San Diego Air Pollution Control District

Page 1 of 1

APCD1998-SITE-10382 - San Diego APCD - Site for APCD's backup Engine

Menu List View Clone Sgl Clone Mult Update Related Records Search Look

Go To (1) Related Records Renewal Info Status Trust Accounts (0) Workflow

APCD1998-SITE-10382 --> [LUEG-APCD,Administrative,Site,NA] ; Status: Active

- APCD2005-JOB-982534 --> [LUEG-APCD,Permit App,Miscellaneous Equipment,NA] ; Status: Cancelled
- APCD2005-JOB-982535 --> [LUEG-APCD,Permit App,Miscellaneous Equipment,NA] ; Status: Cancelled
- APCD2014-APP-003408 --> [LUEG-APCD,Permit App,Internal Combustion Engines,NA] ; Status: Approved
- APCD1998-JOB-971489 --> [LUEG-APCD,Administrative,Legacy Data,Uncategorized] ; Status: C

2. Please select the HRA record under the highlighted dropdown list, click in the highlighted arrow to move the record to the box shown on the right, then click submit.

Submit New Set Existing Set Cancel Help

Go To story (1) Related Records Renewal Info Status Trust Accounts (1) Workflow Workflow

of Clones per Record Type 1

Clone To Set: Clear

Please select the Record Type

LUEG-APCD/HRA/NA/NA

LUEG-APCD

- Administrative
- AQ Network
- Asbestos
- Certificate App
- Complaint
- Compliance
- Equipment Type
- GRANTS
- Grid Search
- Hearing Board
- HRA
- NA
- Job

3. Please select the contact checkbox to copy the contact information to the HRA record and click submit. The HRA record will be available under the site record (see related record configuration in BCMS)

Engineering Division Manual of Procedures

Submit Reset Cancel Help

Record Specific Information

- ☐ Fee Items ([Select](#))
- ☐ Workflow Status
- ☐ Inspection ([Select](#))
- ☐ Record Specific Info ([Select](#))
- ☐ Additional Info
- ☐ Valuation Calc
- ☐ Workflow Task Specific Information
- ☐ Status or New Status: [--Select--](#)
- ☐ Status History

General Record Information

- ☐ Record Details ([Set Application Description](#))
- ☐ Parcel
- ☐ Parcel Owner
- ☐ Address
- ☐ Assets
- ☒ Contact ([Select](#))
- ☐ Licensed Professionals ([Select](#))
- ☐ Document
- ☐ Preserve Dates

☐ Record Conditions ([Select](#))

☐ Inspection Conditions ([Select](#))

☐ Conditions of Approval ([Select](#))

☐ Education

☐ Continuing Education

☐ Examination

☐ Record Comments

☐ Activities

4. Please update the following fields

APCD2021-HRA-0001

Save Reset Help

Go To < Record Specific Info Record Specific Info Tables (0) Record Status History (2) Related Records

FACILITY NOTIFICATION

Facility Notification *

01/05/2021

HRA Submittal Due Date

II. Updating the fields in BCMS – Hot Spot Team Members & Senior Engineer

The fields in BCMS must be updated by the team member who has been assigned the record. It is critical to update these fields on a timely manner (upon completion of the tasks). The information in these fields must be accurate as it must be used to verify compliance with the applicable deadlines under the Health and Safety code and Rule 1210.

The Hot Spot team members and senior engineer must run the “Health Risk Assessment Report” from BCMS on a regular basis to track the deadlines. If a facility fails to meet a deadline the Chief and/or Deputy Director should be informed immediately.

The following fields must be completed by the team member who is assigned the record as follows:

FACILITY NOTIFICATION

Facility Notification *

01/05/2021

Reminder Sent

HRA Submittal Due Date

Engineering Division Manual of Procedures



Engineering Division Manual of Procedures

Public Notification Completed
[] []

Is a Public Meeting Required
☐ Yes ☐ No

Public Meeting Deadline
[] []

Public Comment Deadline
[] []

APCD Public Meeting Notification Date
[] []

Callout 1: Date the facility notifies the public. Per rule 1210 it should be within 30 days from when the APCD approves it

Callout 2: This date is 30 days from when the public notification is sent

Callout 3: For the initial notification a meeting is required. For annual notifications, consult with your supervisor and Chief to determine if a meeting will be required.

Callout 4: Date the APCD notifies the facility that a public meeting is required (Rule 1210(d)(10))

Callout 5: If a public meeting is needed it must be conducted within 30 days from the public notification date (Rule 1210(d)(10))

The following fields should also be updated with the health risk information from the approved HRA.

HEALTH RISKS

Maximum Individual Excess Lifetime Cancer Risk

[] (Number)

Maximum Occupational Excess Lifetime Cancer Risk

[] (Number)

Maximum Residential Chronic Non-Cancer Health Hazard Index

[] (Number)

Maximum 8-Hour Occupational Non-Cancer Health Hazard Index

[] (Number)

Maximum Residential Acute Health Hazard Index

[] (Number)

Population Excess Cancer Burden

[] (Number)

Maximum Residential Excess Lifetime Cancer Risk

[] (Number)

Maximum Chronic Non-Cancer Health Hazard Index

[] (Number)

Maximum Occupational Chronic Non-Cancer Health Hazard Index

[] (Number)

Maximum Acute Health Hazard Index

[] (Number)

Maximum Occupational Acute Health Hazard Index

[] (Number)

III. APCD HRA Comments - Hot Spots Team Members & Senior Engineer

The HRA must be reviewed in accordance with the Health and Safety code, sections 44360-62.

Please be aware that section 44262(a) states “Taking the comments of the Office of Environmental Health Hazard Assessment into account, **the district shall approve or return for revision and resubmission and then approve**, the health risk assessment within one year of receipt. **If the health risk assessment has not been revised and resubmitted within 60 days of the district's request of the operator to do so, the district may modify the health risk assessment and approve it as modified.**”

Therefore, if the District cannot approve the HRA the District must provide comments to the facility and give it an opportunity to revise and resubmit the HRA within 60 days before the District revises the HRA. If the facility resubmits a revised HRA within 60

Engineering Division Manual of Procedures

days that cannot be approved, then the team member should inform the senior engineer for specific guidance.

When providing comments to the facility, APCD should clearly state that section 44362(a) of the Health & Safety code states *“If the health risk assessment has not been revised and resubmitted within 60 days of the district’s request of the operator to do so, the district may modify the health risk assessment and approve it as modified”*.

The Health and Safety Code does not require an endless circle of reviews, revisions, comments, and resubmittals of HRAs.

IV. HRA Approval -Notifying facilities of public notification and risk reduction requirements - Hot Spots Team Members & Senior Engineer

After considering the comments received by facilities within the 60-day period, the HRA should be approved by the APCD per Health and Safety code, sections 44360-62. The team member that is assigned the HRA record should prepare a notification to the facility informing of the approved HRA results, applicable public notification and/or risk reduction requirements (including template notification letters for each type of notification required (residential cancer, residential cancer plus acute, etc.), the fact sheet and survey response card), and a response to the comments provided by the facility. This notification must be approved by the Senior Engineer.

The team member assigned the HRA record and the senior are responsible for tracking the submittal of the public notification package and the risk reduction plan. This can be done by adding reminders in outlook and monitoring the HRA records by running the report.

The HRA record should not be approved until any required public notification is completed and the risk reduction plan is submitted and approved (if applicable).

V. Reviewing the public notification package - Hot Spots Team Members & Senior Engineer

The team member who is assigned the HRA record is responsible for reviewing the public notification and ensure compliance with all applicable requirements under Rule 1210 including:

- Deadline for submittal (per Rule 1210(d)(2) they have 45 days)
- Compliance with Rule 1210(d)(2) and Rule 1210(d)(3)(iv), which is an optional informational letter, as decided by the stationary source
- A list of the primary languages spoken by non-English speaking persons in the area to receive notification where such language is the primary language of five percent (5%) or more of the total persons to be notified in any census tract in the area to receive notification. Multilingual notifications shall be provided by the owner or operator of a stationary source if five percent (5%) or more of the recipients within any census tract in the area to receive notification are non-English speaking. In such case, the

Engineering Division Manual of Procedures

notifications shall be provided in those languages which are the primary language of five percent (5%) or more of the total persons to be notified in that census tract.

- A proposed method for responding to public comments and requests.
- The “Air Toxics Hot Spots Fact Sheet” and a “Public Response Survey Card” provided by the APCD. Template is available in [SharePoint](#).
- Ensure the proposed optional stationary source informational letter complies with Rule 1210(d)(3)(iv)

If any of the above requirements is not met the team member who is assigned the HRA record should send a written notification to the facility providing comments as soon as possible but at least one week from when the APCD must approve the notification package. The notification should use the wording in the template available in [SharePoint](#).

VI. Providing envelopes to the facility - Hot Spots Team Members

Per Rule 1210(d)(6) each public notification shall be mailed in an envelope supplied by the APCD. The envelope shall be marked with the name and address of the Air Pollution Control District and addressed to “Current Resident” of private residences, business or sensitive receptors. Please make sure to coordinate with the Support Services team to give them sufficient time to prepare these envelopes.

VII. Approving or Cancelling HRA Records – Senior Engineer

Cancelling HRA Records

When the Emission Inventory team can enhance the prioritization scores and the facility is no longer subject to the HRA requirements under AB2588, the senior engineer should cancel the HRA record in BCMS following the steps below:

1. Ensure all relevant documents are available in BCMS (see documentum section of this procedure), including:
 - a. The HRA request
 - b. Documentation of the revised prioritization scores explaining why the HRA is no longer required
 - c. Documentation informing the facility the HRA is no longer required
2. Ensure the trust account has sufficient funds to cover the pending charges and request an invoice accordingly
3. Close the workflow tasks, except for the accounting reconciliation task, which should be assigned to accounting

The screenshot shows the 'Task Details - Accounting Reconciliation' window. On the left, a 'Workflow Tasks' sidebar lists 'Facility Notification', 'HRA Review', 'HRA Revision', 'Public Notification', and 'Accounting Reconciliation' (highlighted in yellow). The main area displays task details: 'Action By Division' is 'Current Division' (APCD Compliance Supervisor), 'Action By' is 'Current User' (Mahiany Luther), and 'Assigned to Division' is 'APCD Accounting'. A yellow box highlights 'Assigned to Zenaída Samaniego'. Below this, 'Current Status' is shown, followed by fields for 'Now Status (Alt + S)', 'Hours Spent (Alt + H)', and 'Status Date'.

4. Change the record status to cancel

Engineering Division Manual of Procedures

APCD2021-HRA-0001

Save Reset Help

Go To < Status Trust Accounts (0) Workflow Workflow History (0)

Use this form to change overall Record Status. Please include comments.

Action By Division * [Current Division](#)
APCD Compliance Supervisor

Action By * [Current User](#)
Mahiany Luther

Status Date * 01/08/2021

New Status * **Cancelled**

Comments [Standard Comment](#)

[check spelling](#)

Approving HRA Records

The HRA records should be closed when the entire public notification process is completed (i.e. after the APCD determines a public meeting is not needed or after a public meeting is conducted per Rule 1210(d)(10)) and/or the risk reduction plan is submitted and approved (if applicable).

1. Ensure all relevant documents are available in BCMS (see documentum section of this policy)
2. Ensure the trust account has sufficient funds to cover the pending charges and request an invoice accordingly
3. Close the workflow tasks, except for the accounting reconciliation task, which should be assigned to accounting

Workflow Tasks

- Facility Notification
- HRA Review
- HRA Revision
- Public Notification
- Accounting Reconciliation**

Task Details - Accounting Reconciliation

Action By Division * [Current Division](#)
APCD Compliance Supervisor

Action By * [Current User](#)
Mahiany Luther

Assigned to Division
APCD Accounting

**Assigned to
Zenaida Samaniego**

Current Status

Now Status (Alt + S) * Hours Spent (Alt + H) * Status Date *

Engineering Division Manual of Procedures

4. Change the record status to “approved”

The screenshot shows a web-based form for changing the status of record APCD2021-HRA-0001. At the top, there are buttons for 'Save', 'Reset', and 'Help'. Below these are tabs for 'Go To', 'Status' (which is highlighted in yellow), 'Trust Accounts (0)', 'Workflow', and 'Workflow History'. The main instruction reads: 'Use this form to change overall Record Status. Please include comments.' The form contains two dropdown menus: 'Action By Division * Current Division' set to 'APCD Compliance Supervisor' and 'Action By * Current User' set to 'Mahiany Luther'. There is a 'Status Date *' field with the date '01/08/2021' and a calendar icon. The 'New Status *' dropdown is set to 'Approved' and is highlighted in yellow. Below these is a 'Comments' section with a 'Standard Comment' button and a large text area. At the bottom left of the form is a 'check spelling' link.

VIII. Invoices- Hot Spots Team Members & Senior Engineer

All of the labor associated with the Hot Spots program must be logged under the HRA record. The Hot Spots team member assigned the HRA record and the senior engineer are responsible for monitoring the trust account of the HRA record and request invoices accordingly. The HRA record is NOT associated with Real Time Accounting so the trust account must be monitored. The trust account is part of the HRA report.

An invoice must be requested by the Hot Spots team member and approved by the senior when the HRA is submitted by the facility or when the work will exceed about \$500. All the other tasks can be performed and the invoice can be generated when the record is closed (cancelled/approved).

IX. Annual Notifications- Hot Spots Team Members & Senior Engineer

At the beginning of the year the Senior Engineer must run the HRA record report and review the [Annual Air Toxics "Hot Spot" Program Report](#) to determine the facilities subject to annual or biennial notifications in accordance with Rule 1210 (d)(8).

The senior should request new HRA BCMS records, which can be created by the aide assigned to the toxic team, and assign the record to a team member.

Engineering Division Manual of Procedures

The senior and team member must consult with the Chief to determine if a public meeting will be required for the annual notification in accordance with Rule 1210 (d)(10).

The team member should notify the facility of the annual notification requirement and public meeting (if required for annual notifications). Under this notification facilities should be reminded of the 45-day requirement to submit the notification package (per Rule 1210).

All sections of this policy and Rule 1210, as applicable, should be followed for annual notifications.

X. Addressing inquiries from the public regarding the public notification

When addressing comments from members of the public, it is important to be available to assist them in understanding the health risk exceedances. HRAs are very complex and the terminology used to convey the health risk exceedances can also be confusing.

Please put yourself in their shoes and consider what information you would need as a member of the public if you received a notification reporting health risks. Some suggestions to consider include:

- Explain why the facility notified. We can say: “*Facility Name* was required to conduct a Health Risk Assessment in accordance with the California Air Toxics “Hot Spots” Program (Program), which addresses public concerns over toxic air contaminant emissions. Toxic air contaminants are chemicals in gases, liquids, or particles that are emitted into the atmosphere and may cause adverse health effects. Adverse health effects can range from relatively mild temporary conditions, such as minor eye or throat irritation, to serious conditions such as cancer or damage to organs.”
- Explain what a HRA is: “*A health risk assessment estimates the risk of adverse health effects from exposures to emissions of toxic air contaminants. The estimated risks are based on computer models that calculate risks based on a variety of conservative assumptions and emission calculations. Facility Name was required to notify all community members in the area where there is a potential health risk above thresholds established by the APCD Rule 1210. As an example, APCD Rule 1210 requires public notification when the estimated increased risk of contracting cancer (above normal background levels) is above 10 in one million. To help put the risk into perspective, consider that the American Cancer Society estimates the total lifetime cancer risk for people living in the United States to be 400,000 in one million*”

Additionally, when responding to the public please ensure the following requirements are met:

Engineering Division Manual of Procedures

1. You must contact every member of the public that contacts you regarding the Hot Spots HRA, even if you are not contacted via the survey
2. If the inquiry is not specific, you should call the person (or send an e-mail) to find out more details and address the question accordingly
3. If you obtain multiple inquiries requesting more information regarding the HRA (more than 5) please contact your supervisor
4. If the member of the public asks for a copy of the official record (e.g. isopleth) please provide it to them. Official records include anything that we would disclose under the PRA

XI. Posting records in documentum – Hot Spots Team Members & Senior Engineer

All relevant documents (i.e. documents associated with the HRA review, public notification, and risk reduction) must be posted in BCMS under the HRA record. Except for invoices, all documents posted under the HRA records related to the Hot Spots program must be posted in documentum using the “APCD-ENG-HOTSPOTS” group and appropriate category as shown below. Please note that any confidential information such as “attorney-client” communication must be posted using the “trade secret” categories listed below. **All documents that are not designated as “trade secret” will be disclosed to the public. Draft documents, zipped files, and internal communication should NOT be posted in documentum.**

All data files should be maintained in [SharePoint](#) and available to the public upon request.

The name of the document should follow the following format:

<EI Year>_<Type of Document>_<Date of Document>

The Type of Document should follow the Document column below (HRA Request, OEHHA Submittal, Public Notification Plan, etc.

Engineering Division Manual of Procedures

Document permissions are based on the document type and your role at APCD.

Document Group/Category [Required] *

APCD-ENG-HOTSPOTS

Division Current Division

APCD Compliance Supervisor

Description

<

My Tasks

My Task Searching

Menu Assign Claim Release

Workflow Tasks (0) Inspections (0)

CAP Reference Status

0 record(s) found.

--Select--

APCD-Air-Toxics-Correspondences

APCD-Air-Toxics-Correspondences-Trade-Secret

APCD-Air-Toxics-HRA-Approved

APCD-Air-Toxics-HRA-Comments

APCD-Air-Toxics-HRA-Request

APCD-Air-Toxics-HRA-Rescind-Letter

APCD-Air-Toxics-HRA-Submittal

APCD-Air-Toxics-Invoice

APCD-Air-Toxics-OEHHA-Comments

APCD-Air-Toxics-Prioritization

APCD-Air-Toxics-Public-Notification-Approved

APCD-Air-Toxics-Public-Notification-Comments

APCD-Air-Toxics-Public-Notification-Submittal

APCD-Air-Toxics-Report

APCD-Air-Toxics-Risk-Red-Approved

APCD-Air-Toxics-Risk-Red-Submittal

APCD-Air-Toxics-Supp-docs

APCD-Air-Toxics-Supp-docs-Trade-Secret

APCD-EI Supp docs

APCD-EI Supp docs Trade Secret

APCD-EI-Correspondences

APCD-EI-Correspondences Trade Secret

APCD-EI-Data Req

APCD-EI-Data Submittal

APCD-EI-Data Submittal Trade Secret

APCD-EI-Emission Statement

APCD-EI-HRA Submittal

APCD-EI-Inv Tracking

APCD-EI-Prioritization

Duration (Days)

The following table list some critical documents that must be available under the HRA records with the specified document group/category.

Document	Documentum Group	Documentum Category	Team Member Responsible for Posting the Document
HRA Request (when facility is notified a HRA is needed under the Hot Spots program)	APCD-ENG-HotSpots	APCD-Air-Toxic-HRA Request	Aide
Documentation of the revised prioritization scores explaining why the HRA is no longer required	APCD-ENG-HotSpots	APCD-Air-Toxic-Supp-docs	Aide
Documentation informing the facility the HRA is no longer required	APCD-ENG-HotSpots	APCD- Air-Toxics-APCD HRA Rescind Letter	Aide

Engineering Division Manual of Procedures

HRA Received by the Facility	APCD-ENG-HotSpots	APCD- Air-Toxic -HRA Submittal	Hot Spots Team member (who has been assigned the HRA record)
Record showing when the APCD sent HRA to OEHHA	APCD-ENG-HotSpots	APCD- Air-Toxics-Correspondences	Hot Spots Team member (who has been assigned the HRA record)
OEHHA Comments on the HRA	APCD-ENG-HotSpots	APCD- Air-Toxics-OEHHA Comments	Hot Spots Team member (who has been assigned the HRA record)
APCD Comments on the HRA submitted to Facility	APCD-ENG-HotSpots	APCD- Air-Toxics-APCD HRA Comments	Hot Spots Team member (who has been assigned the HRA record)
Facility Response to APCD Comments on the HRA	APCD-ENG-HotSpots	APCD- Air-Toxics Correspondences	Hot Spots Team member (who has been assigned the HRA record)
APCD HRA Approval	APCD-ENG-HotSpots	APCD- Air-Toxics -HRA Approved	Hot Spots Team member (who has been assigned the HRA record)
Public Notification Plan submitted by the facility	APCD-ENG-HotSpots	APCD- Air-Toxics -Public Notification Submittal	Hot Spots Team member (who has been assigned the HRA record)
Public Notification Plan Approved by the APCD	APCD-ENG-HotSpots	APCD- Air-Toxics -Public Notification Approved	Hot Spots Team member (who has been assigned the HRA record)
APCD Public Meeting Notification sent to the facility	APCD-ENG-HotSpots	APCD -Air-Toxics Correspondences	Hot Spots Team member (who has been assigned the HRA record)
APCD Public Meeting Presentation (Adobe Acrobat version)	APCD-ENG-HotSpots	APCD – Air Toxics Correspondences	Senior Engineer
Risk Reduction Plan proposed by Facility	APCD-ENG-HotSpots	APCD-Air-Toxics -Risk Reduction Submittal	Hot Spots Team member (who has been assigned the HRA record)
Approved Risk Reduction Plan	APCD-ENG-HotSpots	APCD- Air-Toxics -Risk Reduction Approved	Hot Spots Team member (who has been assigned the HRA record)
Public Comments	APCD-ENG-HotSpots	APCD-Air-Toxics Correspondences	Hot Spots Team member (who has been assigned the HRA record)

Engineering Division Manual of Procedures

Public Comment Responses	APCD-ENG-HotSpots	APCD-Air-Toxics-Correspondences	Hot Spots Team member (who has been assigned the HRA record)
--------------------------	--------------------------	--	--

XII. Clarifications related to Rule 1210

School Notification

Rule 1210(d)(3)(vi) specifies the notification requirements applicable to parents or legal guardians of students attending schools with potential exposure to risks above the significant risk thresholds as required by Subsection (d)(1), which are:

- Maximum incremental cancer risks equal to or greater than 10 in one million, or
- Cancer burden equal to or greater than 1.0, or
- Total acute noncancer health hazard index equal to or greater than 1.0, or
- Total chronic noncancer health hazard index equal to or greater than 1.0.

After consulting with counsel, this notification requirement applies to all schools located in an area for which any of the significant risk thresholds are exceeded.

Sensitive Receptors

For the purposes of Rule 1210, sensitive receptors include schools, hospitals, day care centers, and convalescent homes.

Sensitive Receptor Notification requirements

All sensitive receptors must be notified for that type of exceedance if they are within any isopleth. Specifically:

- If the sensitive receptor is contained within one of the isopleth above the limits stated in Rule 1210 that facility (i.e. sensitive receptor) is required to be notified. For schools Rule 1210 also requires the parents to be notified if they are within one of the notification isopleths.
- Every contour or isopleth should be used to identify sensitive receptors that are required to be notified.
- While cancer burden is calculated at the centroid of the census tract, notification requirements apply to all residential addresses and sensitive receptors within the one in one million isopleth for cancer burden.

Notification Letters

The APCD notification letter signed by the APCO discusses the type of health risk exceedance the receptors are subject to. For some facilities there might be

Engineering Division Manual of Procedures

multiple areas subject to different health risk exceedances. If this is the case, the receptors should only be notified of the health risk exceedance they are subject to. Consequently, the APCD might have to provide multiple versions of the notification letters to the facility but the receptors should only be receiving one letter.

Appendix I. EPA's Response to Comments

**EPA Region 9 Responses to the SDAPCD Comments on the
Draft Title V Program Evaluation Report
September 30, 2022**

Responses to Comments

Thank you for providing comments on the draft title V program evaluation report.¹ On August 30, 2022, the District provided its comments via a “marked up” version of the draft. Below, we summarize the significant comments and provide our response. Note: use of the word “we” or “our” refers to the EPA.

1. Executive Summary

SDAPCD Comment: The SDAPCD suggested some changes in tone and corrected some organizational information. The SDAPCD also requested a clarification that new title V sources resulting from any non-attainment redesignation have one year from the date of EPA’s final approval of the SDAPCD’s revised title V rules to submit their title V application.

EPA Response: The EPA appreciates the SDAPCD’s correction and suggestions. We changed some wording in the Executive Summary and modified the SDAPCD organization description based on the comments. We recommend the SDAPCD update its organization chart and website to reflect these changes.

Regarding when new title V sources need to submit an application for a title V permit due to reclassification, we added a footnote to the final report for more context. Generally, new title V sources would have had one year from the effective date of a reclassification to submit their initial title V application. However, the EPA should have been clearer in our ozone reclassification action for San Diego County on the timing for SDAPCD to submit an updated title V program to the EPA. We should have specifically identified that the SDAPCD’s title V program was deficient pursuant to CAA section 502(i) and 40 CFR 70.10 for not having a program that adequately implements the CAA’s required major source thresholds, and then required the SDAPCD to submit a program revision pursuant to 40 CFR 70.4. Because our reclassification action was not specific in this regard, we believe that our action was not an official notice of deficiency and has not triggered sanctions under CAA section 502(i). Also, because the SDAPCD has submitted revisions to EPA to correct the deficiency, and EPA is processing the program revision, we are not planning to issue a formal notice of deficiency. Thus, upon the effective date of the EPA’s approval of regulations that includes the required 25 ton per year major source threshold in San Diego County, sources newly subject to the program will have 12 months to submit initial title V applications. The EPA is taking steps to ensure any future reclassification actions specifically cite to the authorities in the title V program.

¹ The EPA’s responses to comments, along with the SDAPCD’s comments, are included as Appendix I and J, respectively, in the final report.

2. Finding 2.1

SDAPCD Comment: The SDAPCD stated that the Standard Operating Procedure (SOP) revisions were already provided previously and explained the District's review process. In general, because the SDAPCD first issues local Authorities to Construct (ATCs) to modifications to all facilities, including both title V and non-title V facilities, those ATCs undergo review by Senior Engineers before being sent to Compliance Division for review. For title V facilities, those local permits, which have already undergone review by both Engineering and Compliance, are then incorporated into title V facility permits either with the next title V revision or at the time of renewal. The SDAPCD stated that the EPA received inconsistent answers because of the limited experience of some staff. The SDAPCD agreed that additional training is helpful, especially for new staff.

EPA Response: The EPA appreciates the SDAPCD's feedback and modified the finding to acknowledge that there is an SOP for processing title V permits. Nevertheless, as the SDAPCD stated, more training is necessary to ensure the written process is being followed. We emphasize that for ATCs relating to title V sources, there should be an evaluation documented by the District identifying the type of title V revision that is required for the action. In the documents we have reviewed, the local permit engineering evaluations only focused on the NSR aspects of a change while title V related determinations were not documented, and therefore likely not reviewed by the review chain.

3. Finding 2.2

SDAPCD Comment: The SDAPCD stated that the engineering evaluations of the local permits includes the detailed and site-specific items mentioned in the EPA's discussion of what needs to be included in a statement of basis. The SDAPCD has consistently provided statements of basis as part of all permitting actions submitted for EPA comment, and had not received comments about lack of content, or any significant deficiency. As indicated the type of analysis is contained in the engineering evaluations for the underlying equipment or in previous statements of basis if the underlying rationale has not changed. The SDAPCD would be happy to further discuss this with the EPA.

EPA Response: The EPA acknowledges permits are sent to the EPA for review during the regular reviewing cycles; however, the program evaluation is our opportunity to do a deep dive and review multiple permits at once to have a better understanding of the full program and provide broader feedback as a whole. If the information included in the engineering evaluations is applicable to the source's title V actions, then these evaluations should be submitted to the EPA as part of the title V permit review—currently they are not. The EPA appreciates the SDAPCD's efforts in addressing these issues and the EPA will continue to work with the SDAPCD in tracking the recommendations via a workplan and analytical review as noted in the report. This finding and recommendation remain as drafted; language on submitting any relevant supporting documents during EPA permit review was added.

4. Findings 2.4/7.2 - 502(b)(10)

SDAPCD Comment: The SDAPCD agreed that all 502(b)(10) changes submitted must be reviewed and determined whether or not they qualify as such. However, the SDAPCD did not agree with the EPA's conclusion that the SDAPCD did not make a determination of the appropriate type of permit action. It appeared that this finding should have been more focused on the lack of clear information to document a determination, rather than concluding that there was a lack of making correct determinations, unless the EPA has identified any changes which were improperly classified.

The SDAPCD noted that they provided some of these supporting engineering evaluations to the EPA staff as part of the document request and has included a spreadsheet listing all title V applications either received or approved within the previously requested timeline, including an annotation regarding the type of application and a brief description of the proposed change. This list shows that the SDAPCD processes each different type of application, not just 502(b)(10) changes. The SDAPCD processes very few significant modifications, but this is due to the types of modifications being proposed, not lack of reviewing requirements. The District mentioned one example that contained analysis of minor/significant projects.

EPA Response: The EPA acknowledges that the draft findings on this issue appeared somewhat conclusive and has made minor revisions to Findings 2.4 and 7.2 to clarify that the focus on the finding is lack of information for title V modification determinations. The EPA reviewed engineering evaluations for local permits and the list provided by SDAPCD in making this determination. Please note that the example mentioned in the comments was not provided by the time of the issuance of this report. In most of the files reviewed, there was no supporting documentation explaining whether a proposed modification was subject to a title V modification or what type. For this reason, if a determination is made, even if it is prior to submittal of an application, we recommend that it be documented.

5. Findings 2.4/5.3 - Enhanced NSR

SDAPCD Comment: The SDAPCD disagreed with the EPA's contention that the EPA and public review somehow does not occur for NSR changes. District Rule 20.3 requires that an EPA comment period and public notice is conducted equivalent to the same level required for significant modifications or new permits prior to an authority to construct being issued. Additionally, if such a notice was required, the title V application would be treated as a significant modification or an initial permit, as appropriate, and a separate EPA comment period would occur prior to issuance of the title V permit, as required by SDAPCD rules. Alternatively, at the discretion of the SDAPCD and the permit applicant, the project can be processed under "enhanced ATC" provisions, which would combine the two notice/comment periods. The SDAPCD also stated that it appears that the EPA may be inferring that the SDAPCD is not implementing this correctly while also stating that there are no examples of the SDAPCD using this program (if EPA would like to see an example, the SDAPCD would be happy to provide an example of a permit where an A/C was issued using enhanced procedures and an administrative amendment was filed, but not acted on yet). Also, the

SDAPCD did not agree with the EPA's implication of using 502(b)(10) changes instead of documenting enhanced NSR.

EPA Response: Please note the revision that was made to finding 2.4, as well as some clarifications to the discussion in finding 5.3. Also note that while the EPA requested examples of enhanced NSR actions, we did not receive any examples by the time of the issuance of this report. The EPA appreciates the SDAPCD's efforts in addressing these issues and the EPA will continue to work with the SDAPCD in tracking the recommendations via a workplan and analytical review as noted in the report.

6. Findings 2.4 - PSD

SDAPCD Comment: The SDAPCD agreed to coordinate with EPA on whether or not new sources or modifications to existing sources trigger prevention of significant deterioration (PSD) requirements. The District also stated that the EPA specifically identifies PSD and title I modifications as concerns. However, these requirements would be addressed during the local permitting review which would include notification to the EPA if a project constituted a federal major modification or triggered PSD requirements. In recent years, none of the projects that would have potentially required PSD permits were approved (or were modified to no longer trigger PSD requirements).

EPA Response: The EPA appreciates the SDAPCD's coordination with the EPA on whether or not new sources or modifications to existing sources trigger PSD requirements. From our review of some of the District's PSD analyses, it is unclear what methodology the District is using to determine whether a project is a federal PSD major modification. The analyses we reviewed did not use or cite 40 CFR 52.21, the federally applicable PSD regulation in San Diego County. We are making some additional clarification to the finding to state that we would like to be involved in the evaluation of whether PSD applies and not only when the SDAPCD believes that it applies. It may be appropriate to include this issue in your workplan, where we can mutually agree on the method for EPA involvement.

7. Finding 2.5

SDAPCD Comment: The SDAPCD would like to clarify that when the SDAPCD cites "NSR" as the basis for a condition, it simply cites Rule 20.2 or 20.3 (depending on whether the source is major or non-major for criteria pollutants). This is no different than any other rule citation. The SDAPCD would like to point out that the EPA has not previously raised this concern during the review of title V permits as a comment or an objection.

The SDAPCD clarified with an example: if an ATC condition has already been fulfilled prior to issuance of a title V permit (such as requirements for initial source testing) the SDAPCD may not place that condition in the title V permit because the initial source testing will be completed prior to issuance of the title V permit.

EPA Response: The EPA acknowledges title V permits are sent to the EPA for our review; however, the program evaluation is our opportunity to do a deep dive and review multiple permits at once to have a better understanding of the full program instead of commenting through regular renewal cycles to avoid delays for the District. As we stated in the finding, each title V permit is required to specify and reference the origin and authority for each term or condition and identify any difference in form as compared to the applicable requirement upon which the term or condition is based.² If the condition is incorporated from an NSR permit, then the permit number should be cited in the title V permit as the origin. NSR conditions that are not appropriate for inclusion in the title V permit should be documented in the statement of basis. This finding and recommendation remain as drafted.

8. Findings 2.6

SDAPCD Comment: The SDAPCD noted that streamlining typically occurs during the local permit review stage, not as a separate analysis in the title V statement of basis. The SDAPCD typically conducts an equivalent streamlining analysis as part of the local permit review and these conditions are later incorporated into the title V permit through the appropriate modification application. The District's normal practice is to review requirements rule by rule in the engineering evaluation and then any similar requirements will be automatically streamlined into the permit conditions. This approach ensures all requirements of all rules are reviewed to ensure the permit is enforceable.

EPA Response: While we reviewed a sample of local permit engineering evaluations, we did not find examples streamlining analysis documented. Nevertheless, if the SDAPCD does have engineering evaluations that include these analyses, then they should also be submitted as part of the statement of basis. This finding and recommendation remain as drafted.

9. Finding 2.7

SDAPCD Comment: The SDAPCD stated that it is important to note that not all requirements in local permits, such as some state or local toxics rules, are federally enforceable.

EPA Response: We agree with the SDAPCD and made a clarification to Finding 2.7 to reflect that not all requirements are federally enforceable.

10. Finding 3.1

SDAPCD Comment: The SDAPCD stated that it has no sources which require CAM and impose all monitoring requirements through permit conditions directly requiring periodic monitoring. The SDAPCD does evaluate for CAM applicability. In order to be subject to CAM, the source has to have a pollutant specific emissions unit (PSEU) with an applicable emissions limit and control device, and the pre-control emissions must exceed major source thresholds (40 CFR Part 64.2). As mentioned

² See 40 CFR 70.6(a)(1)(i).

earlier, some of the staff interviewed have not had much title V experience, but the Senior Engineers ensure CAM applicability is evaluated. The SDAPCD is open to further training on CAM.

EPA Response: The EPA appreciates the SDAPCD's comment; however, the EPA reaffirms that a title V renewal permit is a new, standalone permit and, to the extent the District wants to rely on prior CAM determinations, those determinations need to be included in the renewal action. It is not uncommon to find errors in prior determinations and the District is obligated to fix such errors in title V renewal permits. The EPA will work with the SDAPCD to ensure its staff receive CAM training. This finding and recommendation remain as drafted.

11. Finding 3.2

SDAPCD Comment: The SDAPCD stated that the District conducts most of its review as part of the local permit evaluation and considers both Engineering and Compliance input prior to a permit being issued. The SDAPCD believes that, as the EPA's review has also confirmed, appropriate monitoring provisions have been incorporated into title V permits. Further, the EPA has not previously commented or raised objections due to lack of monitoring requirements during the EPA's past review of title V permits. The SDAPCD will continue to ensure daily emission limits have adequate monitoring requirements, and believes that reviewing all title V permits again at renewal for periodic monitoring would be redundant and resource intensive.

EPA Response: First, please note that while the EPA strives to provide feedback on proposed title V permits, our not providing comments or objecting on a specific topic does not mean that the issue does not exist. In addition, the intent of the title V program is to have a comprehensive review of the title V permit every five years, and resources should be allocated to ensure this happens. Thus, the EPA disagrees with the SDAPCD's comment that reviewing all title V permits at renewal to determine whether periodic monitoring is needed would not be a fruitful exercise. As noted in our finding, during our file review, we found examples of emissions limits that did not have adequate monitoring. This finding and recommendation remain as drafted.

12. Finding 3.3

SDAPCD Comment: The District stated that because Compliance does not usually use the statement of basis and rather enforces the permit requirements and permit conditions, the District does not believe there is an enforceability issue related to incorporating all applicable monitoring and recordkeeping requirements.

With respect to diesel fuel, the SDAPCD includes fuel records in engine permits which are incorporated into title V permits. Diesel fuel requirements are typically specified in the emissions unit specific permit conditions. The District views this as sufficient to ensure only EPA/CARB diesel is used in any diesel powered permitted equipment. For example, the SDAPCD has used the following requirements for a facility which operates an emergency engine which also include streamlined NSPS requirements related to fuel:

- (1) This engine shall only use CARB diesel fuel. (Rule 12, Rule 69.4.1, 17 CCR 93115, 40 CFR 60 Subpart IIII)
- (2) The owner or operator of the engine shall maintain the following records on site for at least the same period of time as the engine to which the records apply is located at the site:
 - (a) documentation shall be maintained identifying the fuel as CARB diesel, and
 - (b) manual of recommended maintenance provided by the manufacturer.(Rule 12, Rule 69.4.1, 17 CCR 93115, 40 CFR 60 Subpart IIII)

EPA Response: We revised the report in response to this comment. We are clarifying that the EPA, not SDAPCD compliance staff, found it challenging to determine that the permit contained all monitoring and recordkeeping because of the lack of details in the statement of basis. Additionally, the EPA appreciates the example provided related to recordkeeping and updated the report to state that this example was provided.

13. Section 4

SDAPCD Comment: The SDAPCD pointed out in the EPA’s description of the public notice process, a public notice may include the time and place of any hearing that may be held. The SDAPCD stated that a public hearing is normally not scheduled in advance before sending out the public notice. A public hearing will only be scheduled if requested during the public comment period and determined that it is justified. The SDAPCD suggested to change the language to indicate that if it has been determined in advance that a public hearing will be held.

EPA Response: Many permitting authorities in EPA Region 9 do not wait to receive a request to hold public hearings as part of their community outreach and Environmental Justice (EJ) efforts and thus include the public hearing information at the time the public comment period begins. Because the statement says to include any public hearing that “may” be held, the description remains as drafted.

14. Finding 4.1

SDAPCD Comment: The SDAPCD considers EJ a high priority and is the first district in California which has an EJ representative on its Governing Board. Also as noted earlier, the SDAPCD has created an Office of EJ and has added significant resources to address public outreach and EJ issues. The SDAPCD posts all title V public notices to our website and is open to discuss further translation of the notices with the EPA. However, please note that the map provided by the EPA has too large of a resolution to be useful for identifying whether projects need translation. Also, the map only identifies the percentile of linguistic isolation, it does not provide actual percentages of people who are linguistically isolated nor what language they speak. This may lead to somewhat misleading data because of the non-linear nature of percentiles. The SDACPD agrees with the EPA that providing assistance to environmentally disadvantaged communities is a critical issue and is actively taking steps to improve in these areas.

EPA Response: The EPA commends the SDAPCD for making EJ a high priority. We note that the map provided was not meant to be used as guidance for permit outreach but to highlight the existence of linguistically isolated communities in San Diego County. EJScreen can easily be tailored to individual permit actions to generate a report that includes the percentages of people who are linguistically isolated and the languages they speak. The SDAPCD should use the tool they find most helpful for their public outreach process. This finding and recommendation remain as drafted.

15. Finding 4.4

SDAPCD Comment: The SDAPCD agreed that if the SDAPCD receives comments from the public during the 30-day public review period, the 45-day EPA review would be restarted as a result of a comment. The SDAPCD further commented that it would be the case if the District modifies the permit, or the comment raises substantive issues that need to be addressed.

EPA Response: When a comment is received, the comment should be provided to the EPA with any responses to comments as part of the permit review package. If the SDAPCD does not believe the comment is significant, we are happy to work with the SDAPCD to determine the correct path, including providing an expedited 45-day review period when appropriate. Given the number of comments the SDAPCD historically receives on draft permits, this should not cause routine delay in the permit issuance process. This finding and recommendation remain as drafted.

16. Finding 5.2

SDAPCD Comment: The SDAPCD previously did not have a policy that specifically required a statement of basis for minor modifications (although all relevant information would have been contained in the related local permit engineering evaluation), so in some previous cases where the SDAPCD thought it would be self-evident that a change qualified as a minor modification, a statement of basis may not have been included. However, the SDAPCD has already instituted a policy which requires documentation through a statement of basis for both minor modifications and 502(b)(10) changes. The SDAPCD appreciates the EPA's recognition that the SDAPCD routinely submits copies of both proposed and final title V permit actions to the EPA. The SDAPCD has also revised its rule procedures to require a statement of basis for minor modifications. The SDAPCD's revised title V rules are presently under review by the EPA.

EPA Response: As part of our review, the EPA requested supporting documents for minor modifications, and we did not find all the relevant information in the local permit engineering evaluations. As previously stated, if the SDAPCD believes the local permit engineering evaluations support the title V permit action, then the evaluations should be included as part of the title V permit package. The EPA commends the SDAPCD for taking steps in making these changes and documenting its permitting decisions. This finding and recommendation remain as drafted.

17. Finding 5.4

SDAPCD Comment: The SDAPCD did not agree that it does not calculate or track the facility's potential to emit (PTE) on a facility-wide basis or may not be properly implementing permitting for sources which take synthetic limits to stay out of title V. While the SDAPCD does not maintain a tabulated list of PTE for all stationary sources, it instead conducts this review at the time a change occurs at a facility.

For existing sources, the SDAPCD utilizes the actual emissions that Rule 60.1 allows for sources to be exempt from title V requirements based on having actual emissions one half the major source threshold (a list of such facilities was provided to the EPA). This means that by tracking actual emissions and identifying those facilities with emissions above half the threshold, the District has to only assess PTE for those facilities with actual emissions between 50 and 100% of the major source threshold to determine if their PTE is below, at, or above 100% of the major source threshold, significantly reducing the resources necessary to identify major sources. Also please note that the SDAPCD evaluates any requirements dependent on facility PTE for NSR during review of the application associated with new or modification of a source.

So to summarize, the SDAPCD does use PTE to determine requirements. However, in lieu of maintaining a tabulated list of facility PTE, the District instead assesses facility PTE at the time each modification occurs and for existing facilities not being modified, tracks actual emissions and compares to the thresholds in SDAPCD Rule 60.1 which means the SDAPCD is using a more stringent screening method to detect title V facilities than required by the underlying rules. Then for any facility with actual emissions above the thresholds of 60.1 the SDAPCD can conduct an assessment of PTE to determine whether the facility is actually exempt based on PTE.

The second point of this finding refers to synthetic minor permits. SDAPCD would like to provide some clarification as to how the local permitting program ties into title V permitting. Rule 60.2 is the SDAPCD's synthetic minor source rule and was intended to be used by existing sources that do not have their emissions limited through NSR. However, for the vast majority of facilities, emissions are limited mainly through permit restrictions imposed through NSR Rules 20.2 or 20.3, including appropriate monitoring and recordkeeping, and included in ATCs and PTOs that are therefore federally enforceable limits.

EPA Response: We disagree that the SDAPCD's approach to determining title V applicability, as described above, is consistent with the title V program. The characterization of Rule 60.1 is not consistent with the rule's own language, as the rule is not applicable to *all* sources but only those that would otherwise be a major source. One would first need to know the PTE of a facility to determine whether Rule 60.1 is applicable because PTE is the determining factor of major source status. Because the SDAPCD does not determine PTE, it is relying on facilities to determine whether they are otherwise a major source. It appears the SDAPCD would like to generally assume that any source with actual emissions below 50% of the major source thresholds is not a title V source. There is nothing in the part 70 program, or the SDAPCD's approved title V program, that supports this approach. Reviewing actual emissions is neither equivalent to nor more stringent than determining PTE.

It was clear during our site visit that the SDAPCD had a difficult time determining which sources would be subject to title V because of the reclassification, as the District does not calculate facility-wide PTE as defined by the title V program. The SDAPCD must develop a plan for ensuring the District can determine title V applicability according to the definitions for “potential to emit” and “major source” in 40 CFR 70.2. The EPA looks forward to working with the District on a workplan at the conclusion of this program evaluation. This finding and recommendation remain as drafted.

18. Finding 6.1

SDAPCD Comment: The processing of open applications should not interfere with the schedule for conducting effective inspections, because the outcome of inspections should be based on existing permits and not applications requesting changes to the permits. The SDAPCD appreciates the EPA’s recognition that the SDAPCD performs Full Compliance Evaluations (FCEs) for all title V sources annually.

EPA Response: From our interviews, the concern expressed to us related to scenarios where open applications delayed completing title V inspections because processing the application would avoid the need to issue a violation. It is possible Engineering and Compliance disagree on the need and urgency of such permit revisions. We continue to recommend increased communication between Permitting and Compliance so that these issues can be addressed and there is a common understanding of what should happen in these scenarios.

19. Finding 6.6

SDAPCD Comment: The District noted that the SDAPCD does not presently have a Permit Streamlining Committee. The SDAPCD also does not believe that permit condition change requests have stopped being made. The SDAPCD appreciates the EPA’s recognition that there is a formal process in place for Compliance to request changes to permit conditions and agrees that a realistic expectation with appropriate timeframe be established. Please note that the SDAPCD had already begun work on addressing this issue. One point to consider is that in order to change permit conditions, the SDAPCD has to follow the formal process which makes it clear that some condition changes to title V permits would require an EPA comment period and, in some cases, public notice and public review. This means that the title V permits can’t just be simply revised without going through title V permits revision requirements. For this reason, some of the requested condition changes in the past have been scheduled to be included with the next permit modification or renewal to avoid multiple permit revisions and EPA or public noticing and reviews.

EPA Response: The Permit Streamlining Committee is included in the SOP we were provided. We recommend the SDAPCD modify its SOP to reflect the current process. The EPA commends the SDAPCD for already working on addressing permit change request issues. We encourage the SDAPCD to provide responses to change requests even when the District does not believe the changes can be made. Having documentation that requestors can refer to will help everyone understand why certain determinations were made.

20. Finding 7.1

SDAPCD Comment: The SDAPCD appreciates the EPA's recognition that the SDAPCD staff receives effective support from the SDAPCD's Counsel. The SDAPCD has a new District Counsel, Veera Tyagi, who has extensive experience in air quality programs. Prior to joining the SDAPCD, Ms. Tyagi worked as a Principal Deputy District Counsel at South Coast Air Quality Management District. We are very happy and excited to have Veera working as our Counsel and she can provide expert legal support on all title V and other air quality matters.

EPA Response: The EPA commends the SDAPCD for finding counsel with extensive experience in air quality programs. This finding has been updated to include this updated information.

21. Finding 7.6

SDAPCD Comment: The SDAPCD stated that a compensation analysis was recently conducted for the Service Employees International Union (SEIU). This analysis, conducted for all represented SDAPCD employees, considered several other local air pollution control districts, such as San Luis Obispo County APCD, Bay Area AQMD, Imperial County APCD, Sacramento Metro AQMD and South Coast AQMD. Also the County Contract for SEIU compensation package was approved by the San Diego County Board of Supervisors in June 2022.

The SDAPCD, like other entities, experienced a high turnover after the COVID-19 pandemic, increasing the number of vacancies. The SDAPCD is committed to continuing to monitor the workload and explore opportunities to provide adequate resources and fill vacancies with the best candidates to address any potential retention issues.

EPA Response: The EPA has modified its finding to reflect the new information that the SDAPCD provided. As a result, our finding is more focused on the need for a review of the District's existing staffing in light of its current permitting backlog as well as a review of the additional staffing that will likely be needed as the number of facilities subject to title V permitting requirements increase under the SDAPCD's new nonattainment reclassification.

22. Finding 8.3

SDAPCD Comment: The SDAPCD noted that the draft report stated that it took three weeks to get a report query. The SDAPCD would like to clarify that it is due to other priorities that the District could not run the query sooner and not that it took three weeks to run one query.

EPA Response: The EPA made minor revisions to this finding to clarify this issue. This issue was flagged in our report because it was a longer than expected timeframe compared to other permitting authorities.

23. Other General Comments

In addition to the significant comments summarized in this document, the SDAPCD provided additional recommendations and commentary related to style, minor edits, and formatting. The EPA reviewed these comments as well and incorporated minor edits into the final report as appropriate.

Appendix J. SDAPCD's Draft Report Response



San Diego County
Air Pollution
Control District

August 30, 2022

Gerardo C. Rios, P.E.
Manager, Permits Office
Air and Radiation Division
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

RE: Draft San Diego County Air Pollution Control District Title V Program Evaluation

Dear Mr. Rios:

Thank you for the opportunity to review and provide comments on the Draft Program Evaluation for the San Diego County Air Pollution Control District's (SDAPCD's) Title V Operating Permit Program Evaluation. I appreciate you and your staff's time, cooperation, support and follow up meetings and correspondence with my staff in conducting the evaluation of the SDAPCD's Title V program. We have reviewed the draft report, and would like to provide you with some additional information and clarification in order to ensure that it more accurately reflects SDAPCD's Title V program.

Therefore, attached please find a copy of the draft report with SDAPCD's comments and responses to each finding and the associated recommendations. Staff provided our response to each finding after each recommendation, along with additional comments related to the finding and the discussion.

Please feel free to contact me at (858)586-2706, Mahiany Luther, Deputy Director, at (858)586-2725, or Mohsen Nazemi, Chief of Engineering Division at (858)922-1182, if you have any questions. I look forward to assisting EPA to finalize the report and to our continued collaboration to ensure the SDAPCD's Title V program is implemented in an effective manner to improve air quality and public health in San Diego County.

Sincerely,

Paula Forbis
Air Pollution Control Officer

San Diego County Air Pollution Control District Title V Operating Permit Program Evaluation

Draft Report

July 28, 2022

Conducted by the

U.S. Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, California 94105

Table of Contents

Acknowledgments	5
Glossary of Acronyms and Abbreviations	6
Executive Summary	7
1. Introduction	10
Background	10
Title V Program Evaluation at the San Diego County Air Pollution Control District	11
Description of the SDAPCD	12
The EPA's Findings and Recommendations	15
2. Permit Preparation and Content	15
2.1 Finding: The SDAPCD has an internal quality assurance process for reviewing draft versions of permits before they are made available for review by the public and the EPA; however, the understanding of the review process is inconsistent between various groups and varies with level of experience.	15
2.2 Finding: The SDAPCD's statement of basis does not consistently describe regulatory and policy decisions the District has made in the permitting process	17
2.3 Finding: The SDAPCD uses template permit documents and maintains template conditions in its database to provide consistency in its permits	19
2.4 Finding: The SDAPCD does not evaluate whether a requested title V permit modification meets the criteria under which it is submitted, including confirming whether a change is a modification under title I of the CAA	20
2.6 Finding: The SDAPCD generally references the underlying origin and authority for permit conditions, but often does not reference the origin of New Source Review (NSR) requirements	22
2.7 Finding: While the SDAPCD appears to streamline applicable requirements in its title V permits, the District generally does not provide the necessary streamlining analysis in the statement of basis	23
2.8 Finding: The SDAPCD clearly identifies locally enforceable conditions in title V permits	25
3. Monitoring	25
3.1 Finding: While the SDAPCD generally reviews CAM applicability, internal guidance needs to be updated and staff need training	26

3.2	Finding: The SDAPCD's title V permits generally contain monitoring that is sufficient to determine compliance with emissions limits. However, the SDAPCD's statement of basis does not consistently address periodic monitoring.....	27
3.3	Finding: The SDAPCD generally includes sufficient recordkeeping requirements as required by the NSPS and NESHAP regulations	28
4.	Public Participation and Affected State Review	29
4.1	Finding: San Diego County contains a significant number of linguistically isolated communities for which the SDAPCD does not consistently provide translation services as required by 40 CFR Part 7.35(a).....	30
4.2	Finding: The SDAPCD provides public notices of its draft title V permitting actions on its website.....	31
4.3	Finding: The SDAPCD provides notification regarding the public's right to petition the EPA Administrator to object to a title V permit	32
4.4	Finding: The SDAPCD's general practice is to conduct a concurrent public and EPA review. If comments are received during the 30-day public review period, the permit package is re-proposed to the EPA for a new 45-day review period.....	33
4.5	Finding: The SDAPCD has a Business Assistance Program (BAP) to conduct pre-application meetings with potential sources to help identify the scope of potential permitting projects and the applicability of regulatory requirements	34
4.6	Finding: The SDAPCD notifies tribes of title V permitting actions.....	35
5.	Permit Issuance / Revision / Renewal.....	36
5.1	Finding: The SDAPCD does not consistently process title V actions in a timely manner, resulting in a permitting backlog.....	36
5.2	Finding: The SDAPCD routinely submits proposed and final permit actions to the EPA.....	37
5.3	Finding: The SDAPCD has authority to use parallel processing to streamline the issuance of modified NSR and title V permits. However, it is not clear that this processing method is correctly utilized.	38
5.4	Finding: The District does not evaluate the potential emissions from sources without title V permits to determine if they are major sources or whether such sources need synthetic limits to avoid title V applicability or other CAA requirements.....	39
6.	Compliance	41
6.1	Finding: The District performs Full Compliance Evaluations (FCEs) of all title V sources on a schedule consistent with its negotiated compliance monitoring strategy (CMS)	42

6.2	Finding: The District’s Compliance Division reviews all title V deviation reports, annual compliance certifications, and semiannual monitoring reports submitted by Part 70 sources.....	42
6.3	Finding: When potential compliance issues are discovered, the District addresses them prior to permit issuance. However, the District’s statement of basis could be improved to include compliance history.....	43
6.4	Finding: The District uses title V compliance certifications and semiannual monitoring reports to prioritize inspections and initiate enforcement actions.....	44
6.5	Finding: Compliance staff have the necessary equipment to perform their job duties but find the procurement process for new equipment to be slow.....	45
6.6	Finding: While the SDAPCD has a process in their internal database for compliance staff to request changes to title V permits, it is unclear if it is being used consistently.....	45
7.	Resources and Internal Management.....	46
7.1	Finding: The SDAPCD staff report that they receive effective legal support from the District Counsel’s office	47
7.2	Finding: The District tracks title V program expenses and revenue and those funds are spent solely to support the title V program.....	47
7.3	Finding: The District permitting and compliance management communicate well and meet routinely to discuss programmatic issues. However, the results of these discussions are not clearly and consistently communicated to compliance staff and has resulted in uncertainty regarding outcomes of issue resolution among compliance staff.....	48
7.4	Finding: The District lacks a training plan for its permitting and compliance staff.	49
7.5	Finding: Permitting staff demonstrated a general lack of knowledge on environmental justice (EJ) and would like the EPA to provide training on this issue	50
7.6	Finding: The SDAPCD is having difficulty retaining permitting and compliance staff.	51
8.	Records Management.....	53
8.1	Finding: The SDAPCD has successfully converted all permitting hard copy files to electronic files and stores historical physical title V permit files in a central records center.....	53
8.2	Finding: The SDAPCD has improved its written file retention policy. However, most staff are not aware of the District’s record retention schedules	53
8.3	Finding: The SDAPCD uses an electronic database to track title V permits and continues to make database improvements	54

Acknowledgments

The EPA Region 9 acknowledges the cooperation of the staff and management of the San Diego County Air Pollution Control District (SDAPCD). We appreciate their willingness to respond to information requests and share their experiences regarding the implementation of the SDAPCD's title V program under the Clean Air Act.

DRAFT

Glossary of Acronyms and Abbreviations

AB	Assembly Bill
Act	Clean Air Act [42 USC Section 7401 et seq.]
ATC	Authority to Construct
CAA	Clean Air Act [42 USC Section 7401 et seq.]
CAM	Compliance Assurance Monitoring
CARB	California Air Resources Board
CFR	Code of Federal Regulations
CMS	Compliance Monitoring Strategy
District	San Diego County Air Pollution Control District
EJ	Environmental Justice
EPA	U.S. Environmental Protection Agency
EPS	Electronic Permit System
FCE	Full Compliance Evaluation
HAP	hazardous air pollutants
NESHAP	National Emission Standards for Hazardous Air Pollutants, 40 CFR Parts 61 & 63
NOV	Notice of Violation
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR Part 60
NSR	New Source Review
NTC	Notice to Comply
OEJ	Office of Environmental Justice
OIG	EPA Office of Inspector General
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
PTO	Permit to Operate
Region	U.S. Environmental Protection Agency Region 9
BAP	Business Assistance Program
SDAPCD	San Diego County Air Pollution Control District
SIP	State Implementation Plan
SOP	Standard Operating Procedure
Team	EPA Region 9 Program Evaluation Team
we	U.S. Environmental Protection Agency

Executive Summary

In response to the recommendations of a 2002 Office of Inspector General (OIG) audit, the U.S. Environmental Protection Agency (EPA or “we”) re-examined the ways it can improve state and local operating permit programs under title V of the Clean Air Act (“title V programs”) and expedite permit issuance. Specifically, the EPA developed an action plan for performing program evaluations of title V programs for each air pollution control agency beginning in fiscal year 2003. The purpose of these program evaluations is to identify good practices, document areas needing improvement, and learn how the EPA can help the permitting agencies improve their performance.

The EPA’s Region 9 (the “Region”) oversees 47 air permitting authorities with title V programs in the Pacific Southwest. Of these, 43 are state or local authorities approved pursuant to 40 CFR part 70 (35 in California, three in Nevada, four in Arizona, and one in Hawaii), referred to as “Part 70” programs. The terms “title V” and “Part 70” are used interchangeably in this report. The Region also oversees a delegated title V permitting program in Navajo Nation under 40 CFR part 71 and title V programs in Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands under 40 CFR part 69, referred to, respectively, as “Part 71” and “Part 69” programs. Because of the significant number of permitting authorities, the Region has committed to performing, on an annual basis, one comprehensive title V program evaluation of a permitting authority with 20 or more title V sources. This approach covers at least 85% of the title V sources within the Region 9 jurisdiction.

The Region initially conducted a title V program evaluation of the San Diego County Air Pollution Control District (SDAPCD or “District”) in 2008 (“2008 Evaluation”).¹ This is the second title V program evaluation the EPA has conducted for the SDAPCD. The EPA Region 9 program evaluation team (“Team”) for this evaluation consisted of the following EPA personnel: Meredith Kurpius, Air and Radiation Division Assistant Director; Gerardo Rios, Manager of the Air Permits Office; Noah Smith, Attorney Advisor; Ken Israels, Program Evaluation Advisor; Sheila Tsai, Program Evaluation Coordinator; Mario Zuniga, SDAPCD Oversight Team Lead; Lisa Beckham, Program Evaluation Team Member; Amber Batchelder, Program Evaluation Team Member; Tina Su, Program Evaluation Team Member; Po-Chieh Ting, Program Evaluation Team Member; Catherine Valladolid, Program Evaluation Team Member; and Camille Cassar, Program Evaluation Team Member.

The program evaluation was conducted in four stages. During the first stage, the Region sent the SDAPCD a questionnaire focusing on title V program implementation in preparation for the interviews (see Appendix B, Title V Questionnaire and SDAPCD Responses). During the second stage, the Team conducted an internal review of the EPA’s own set of SDAPCD permit files. The third stage of the program evaluation was a hybrid site visit, which consisted of Region 9 representatives visiting the SDAPCD office in San Diego, California to conduct interviews of the SDAPCD staff and managers in person and virtually. Because this was a hybrid site visit, some of the interviews were conducted virtually through video conferencing. The site visit took place March 28-30, 2022. Finally, the fourth stage involved follow-up and clarification of issues for completion of the draft report.

¹ San Diego County Air Pollution Control District; Title V Operating Permit Program Evaluation, dated September 30, 2008. See <https://www.epa.gov/sites/default/files/2015-07/documents/sd-finalreport-9302008.pdf>.

We recognize that the District is going through many changes: brand new governance structure, new governing board and leadership, as well as the recent reclassification for ozone from serious to severe. The Region's 2022 evaluation of the SDAPCD's implementation of the Part 70 program concludes that the SDAPCD has areas for improvements but is already taking steps to improve its implementation of the program. For example, title V permitting workload will be distributed more evenly amongst permitting staff and the District is focusing on a more comprehensive outreach process for its programs, including through the creation of the Office of Environmental Justice (OEJ) under the Monitoring and Technical Services Division. A framework for the new Office of Environmental Justice² and Public Participation Plan³ was developed and approved by the new governing board. The SDAPCD is making positive changes and we hope our findings and recommendations will further assist the District in improving its implementation of the program.

Overall, the District's title V permits generally contain sufficient monitoring, recordkeeping, and reporting requirements to determine compliance with emissions limits. The District could use some overall improvement in standardizing and documenting its work processes and permitting decisions in its supporting documents. This would resolve most of the findings we have related to the support document that explains the legal and factual basis for permit conditions (referred to as the "statement of basis"). We also want to emphasize the need for the SDAPCD to evaluate the potential emissions from each facility to accurately determine a source's major source and/or synthetic minor status. We recognize the District is actively working on its backlog and currently lacks sufficient resources, but we also note that the SDAPCD continues to perform full compliance evaluations of all title V sources and reviews all title V deviation, annual, and semiannual reports submitted by Part 70 sources.

Some major findings we want to highlight from our report are listed below:

1. Finding: The SDAPCD's statement of basis does not consistently describe regulatory and policy decisions the District has made in the permitting process. (Finding 2.2)
2. Finding: The SDAPCD does not evaluate whether a requested title V permit modification meets the criteria under which it is submitted, including confirming whether a change is a modification under title I of the CAA. (Finding 2.4)
3. Finding: The SDAPCD provides notification regarding the public's right to petition the EPA Administrator to object to a title V permit. (Finding 4.2)
4. Finding: San Diego County contains a significant number of linguistically isolated communities for which the SDAPCD does not consistently provide translation services. (Finding 4.3)
5. Finding: The SDAPCD has a Business Assistance Program (BAP) to conduct pre-application meetings with potential sources to help identify the scope of potential permitting projects and

² See <https://www.sdapcd.org/content/dam/sdapcd/documents/community/environmental-justice-APCD%20Office%20of%20Environmental%20Justice%20Draft%20Framework.pdf>.

³ See <https://www.participatesdapcd.org/About%20the%20Plan/>.

the applicability of regulatory requirements. (Finding 4.5)

6. Finding: The SDAPCD does not consistently process title V actions in a timely manner, resulting in a permitting backlog. (Finding 5.1)
7. Finding: The District does not evaluate the potential emissions from sources without title V permits to determine if they are major sources or whether such sources need synthetic limits to avoid title V applicability or other CAA requirements. (Finding 5.4)
8. Finding: The District performs Full Compliance Evaluations (FCEs) of all title V sources on a schedule consistent with its negotiated compliance monitoring strategy (CMS). (Finding 6.1)
9. Finding: The District tracks title V program expenses and revenue to ensure that funding is sufficient, and those funds are spent solely to support the title V program. (Finding 7.2)
10. Finding: The SDAPCD has successfully converted all permitting hard copy files to electronic files and stores historical physical title V permit files in a central records center. (Finding 8.1)

Our report provides a series of findings (in addition to those listed above) and recommendations that should be considered in addressing our findings. As part of the program evaluation process, the SDAPCD has been given an opportunity to review these findings and consider our recommendations.

In addition, our evaluation also considered whether issues found during our 2008 Evaluation have since been addressed. As discussed in Findings 2.3, 4.1, and 4.6, the District has corrected issues related to ensuring permits are signed, publishing public notices in a newspaper of general circulation, and notifying tribal governments of title V permitting actions. As discussed in Findings, 2.4, 6.6, 7.3, and 7.5, the District has not fully addressed issues related to streamlining NSR and title V actions consistent with the title V program, ensuring recommendations from compliance staff to improve permit enforceability are considered in a timely manner, improving communication between permitting and compliance staff, and improving permitting staff's knowledge of environmental justice.

To better communicate our recommendations and work together on the recommended improvements, we request an initial kick-off meeting within 90 days of the SDAPCD's receipt of the final report to discuss developing a workplan. A workplan typically includes specific goals and milestones that can be used to demonstrate progress. We commit to meet with the SDAPCD regularly to discuss progress until both the SDAPCD and the EPA mutually agree the workplan items are sufficiently complete.

1. Introduction

Background

In 2000, the EPA's Office of Inspector General (OIG) initiated an evaluation on the progress that the EPA and state and local agencies were making in issuing title V permits under the Clean Air Act (CAA or the "Act"). The purpose of OIG's evaluation was to identify factors delaying the issuance of title V permits by selected state and local agencies and to identify practices contributing to timely issuance of permits by those same agencies.

After reviewing several selected state and local air pollution control agencies, the OIG issued a report on the progress of title V permit issuance by the EPA and states.⁴ In the report, the OIG concluded that (1) a lack of resources, complex EPA regulations, and conflicting priorities contributed to permit delays; (2) EPA oversight and technical assistance had little impact on issuing title V permits; and (3) state agency management support for the title V program, state agency and industry partnering, and permit writer site visits to facilities contributed to the progress that agencies made in issuing title V operating permits.

The OIG's report provided several recommendations for the EPA to improve title V programs and increase the issuance of title V permits. In response to the OIG's recommendations, the EPA made a commitment in July 2002 to carry out comprehensive title V program evaluations nationwide. The goals of these evaluations are to identify where the EPA's oversight role can be improved, where air pollution control agencies are taking unique approaches that may benefit other agencies, and where local programs need improvement. The EPA's effort to perform title V program evaluations for each air pollution control agency began in fiscal year 2003.

On October 20, 2014, the OIG issued a report, "Enhanced EPA Oversight Needed to Address Risks From Declining Clean Air Act Title V Revenues," that recommended, in part, that the EPA: establish a fee oversight strategy to ensure consistent and timely actions to identify and address violations of 40 CFR part 70; emphasize and require periodic reviews of title V fee revenue and accounting practices in title V program evaluations; and pursue corrective actions, as necessary.⁵

The Region oversees 47 air permitting authorities with title V programs in the Pacific Southwest. Of these, 43 are state or local authorities approved pursuant to 40 CFR part 70 (35 in California, three in Nevada, four in Arizona, and one in Hawaii), referred to as "Part 70" programs. The terms "title V" and "Part 70" are used interchangeably in this report. The Region also oversees a delegated title V permitting program in Navajo Nation under 40 CFR part 71 and title V programs in Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands under 40 CFR part 69, referred to,

⁴ Report No. 2002-P-00008, Office of Inspector General Evaluation Report, "EPA and State Progress In Issuing title V Permits", dated March 29, 2002. See <https://www.epa.gov/sites/production/files/2015-12/documents/titlev.pdf>.

⁵ Report No. 15-P-0006, Office of Inspector General Evaluation Report, "Enhanced EPA Oversight Needed to Address Risks From Declining Clean Air Act Title V Revenues", dated October 20, 2014. See <https://www.epa.gov/sites/production/files/2015-09/documents/20141020-15-p-0006.pdf>.

respectively, as “Part 71” and “Part 69” programs. Because of the significant number of permitting authorities, the Region has committed to performing, on an annual basis, one comprehensive title V program evaluation of a permitting authority with 20 or more title V sources. This approach covers at least 85% of the title V sources within the Region 9 jurisdiction.

Title V Program Evaluation at the San Diego County Air Pollution Control District

This is the second title V program evaluation the EPA has conducted for the SDAPCD. The first title V program evaluation was conducted in 2008. Thus, this evaluation is a follow-up to SDAPCD’s 2008 Evaluation. The EPA Region 9 Team for this evaluation consisted of the following EPA personnel: Meredith Kurpius, Air and Radiation Division Assistant Director; Gerardo Rios, Manager of the Air Permits Office; Noah Smith, Attorney Advisor; Ken Israels, Program Evaluation Advisor; Sheila Tsai, Program Evaluation Coordinator; Mario Zuniga, SDAPCD Oversight Team Lead; Lisa Beckham, Program Evaluation Team Member; Amber Batchelder, Program Evaluation Team Member; Tina Su, Program Evaluation Team Member; Po-Chieh Ting, Program Evaluation Team Member; Catherine Valladolid, Program Evaluation Team Member; and Camille Cassar, Program Evaluation Team Member.

The objectives of the evaluation were to assess how the SDAPCD implements its title V permitting program, evaluate the overall effectiveness of the SDAPCD’s title V program, identify areas of the SDAPCD’s title V program that need improvement, identify areas where the EPA’s oversight role can be improved, and highlight the unique and innovative aspects of the SDAPCD’s program that may be beneficial to transfer to other permitting authorities. The program evaluation was conducted in four stages. In the first stage, the EPA sent the SDAPCD a questionnaire focusing on title V program implementation in preparation for the interviews. (See Appendix B, Title V Questionnaire and SDAPCD Responses.) The Title V Questionnaire was developed by the EPA nationally and covers the following program areas: (1) Title V Permit Preparation and Content; (2) General Permits; (3) Monitoring; (4) Public Participation and Affected State Review; (5) Permit Issuance/Revision/Renewal Processes; (6) Compliance; (7) Resources & Internal Management Support; and (8) Title V Benefits.

During the second stage of the program evaluation, the Region conducted an internal review of the EPA’s SDAPCD title V permit files. The SDAPCD submits title V permits to the Region in accordance with its EPA-approved title V program and the Part 70 regulations.

The third stage of the program evaluation was a hybrid site visit, which consisted of Region 9 representatives visiting the SDAPCD office in San Diego, California to conduct interviews of the SDAPCD staff and managers in person. Because this was a hybrid site visit, some of the interviews were conducted virtually through video conferencing. The purpose of the interviews was to confirm the responses in the completed questionnaire and to ask clarifying questions. The site visit took place March 28-30, 2022.

The fourth stage of the program evaluation was follow-up and clarification of issues for completion of the draft report. The Region compiled and summarized interview notes and asked follow-up questions to clarify the Region’s understanding of various aspects of the SDAPCD’s title V program.

Description of the SDAPCD

The SDAPCD's mission is to "improve air quality to protect public health and the environment." The SDAPCD is currently organized into five divisions: (1) Engineering, (2) Compliance, (3) Monitoring and Technical Services, (4) Rule Development, and (5) Grants and Incentives. Stationary source operating permits, including title V permits, are issued by the Engineering Division. Compliance and enforcement activities, such as facility inspections and preparing enforcement cases are handled by the Compliance Division. Source testing is conducted by the Monitoring and Technical Services Division. The Rule Development Division develops and implements air quality rules and attainment plans. The Grants & Incentives Division administers a number of state and local funding programs to reduce emissions, primarily from mobile sources.⁶ The SDAPCD's office is located in San Diego, California.

Since 1955, the 5-member County of San Diego Board of Supervisors served as the District's governing board, known as the Air Pollution Control Board. As of March 1, 2021, California Assembly Bill (AB) 423 (Gloria, 2019) amended State law to restructure and expand the governing board of the SDAPCD. AB 423 adds specified duties to the District, requires the California Air Resources Board (CARB) to conduct a program audit of the District⁷, separates the SDAPCD from the County governance structure, and requires the appointment of a new 11-member governing board.⁸ With AB 423, the SDAPCD is focusing on a more comprehensive outreach process for its permitting actions and has created the Office of Environmental Justice (OEJ) under the Monitoring and Technical Services Division. A framework for the new Office of Environmental Justice⁹ and Public Participation Plan¹⁰ was developed and approved by the new governing board on April 14, 2022. In addition to governing board changes, the SDAPCD recently had several experienced staff retire and selected new senior leadership and a new Air Pollution Control Officer.

In addition to changes in structure and leadership, the workload associated with the SDAPCD's implementation of the title V program is expected to increase. Effective July 2, 2021, the EPA reclassified the San Diego County ozone nonattainment area from "Serious" to "Severe" for the 2008 ozone National Ambient Air Quality Standards (NAAQS) and from "Moderate" to "Severe" for the 2015 ozone NAAQS.¹¹ Upon reclassification, the threshold at which a source is considered a major source under the Part 70 program for emissions of nitrogen oxides (NO_x) and volatile organic compounds (VOC) dropped in San Diego County from 50 tons per year to 25 tons per year. All major stationary sources under part D of the CAA are required to obtain a title V permit and have one year from becoming subject to the title V program to submit an initial title V permit application. Thus, an influx of initial title V applications is expected for those sources newly subject to the title V program in San Diego County.

⁶ See <https://www.sdapcd.org/content/sdapcd/about.html>.

⁷ See <https://ww2.arb.ca.gov/our-work/programs/san-diego-program-review>.

⁸ See <https://www.sdapcd.org/content/sdapcd/about/district-boards/governing-board.html>.

⁹ See https://www.sdapcd.org/content/dam/sdapcd/documents/community/environmental-justice-/APCD%20Office%20of%20Environmental%20Justice_Draft%20Framework.pdf.

¹⁰ See <https://www.participatesdapcd.org/About%20the%20Plan/>.

¹¹ See 86 FR 29522 (June 2, 2021).

The EPA granted the SDAPCD's title V program interim approval effective December 7, 1995, and full approval effective November 30, 2001. The EPA also later granted approval of program revisions that were effective on February 27, 2004.¹² On October 21, 2021, the District submitted additional updates to its title V program that the EPA is currently processing.¹³

The Part 70 program generally requires that a permitting authority take final action on each permit application within 18 months after receipt of a complete permit application. Additionally, a permitting authority must take action on an application for a minor modification within 90 days of receipt of an application (or 15 days after the EPA's 45-day review period, whichever is later) and the permitting authority has 60 days to act on requests for administrative permit amendments.¹⁴ The SDAPCD's local rules regarding title V permit issuance contain the same or more stringent timeframes as the Part 70 program.¹⁵

Currently, there are 28 sources in the SDAPCD jurisdiction that are subject to the title V permit program, with the San Diego County's ozone nonattainment area reclassification, the SDAPCD is expecting at least 12 more title V sources.¹⁶ Unlike the conclusion from our 2008 Evaluation, the District does not currently have sufficient permitting resources¹⁷ and is unable to process title V permit applications in a timely manner that results in a title V permit application backlog.¹⁸

SDAPCD's Approach to the Title V Program

Consistent with the other permitting authorities in California, when the EPA approved the SDAPCD's title V operating permit program, the District had already been implementing an operating permit program locally for many years. As a result, the title V program was implemented as an overlay to the District's local permitting program. The existing program requires permits to be issued for individual pieces of equipment. Each Authority to Construct (ATC) permit is issued prior to the construction of the emissions unit and typically contains conditions required for the construction and initial operation. The ATC permit is then converted to a Permit to Operate (PTO) after construction is completed and operation of the emissions unit has commenced. During the conversion from ATC to PTO, certain ATC permit conditions are not retained in the PTO if the ATC conditions are determined to be obsolete or irrelevant because they were construction related. Furthermore, because these operating permits are

¹² See Appendix A, 40 CFR part 70.

¹³ This revision includes updates to the District's definition for major stationary source. Although the District has revised its NSR rules to include the correct major source thresholds, the definition in the District's title V rules still contains an error where the major source threshold for *all* criteria pollutants is identified as 100 tons per year. Although this error exists, the SDAPCD implemented its approved title V program at the prior 50 tpy threshold for NO_x and VOC consistent with the requirements of title V of the CAA and the Part 70 program. The revisions we are currently processing will clarify which sources must obtain title V permits. If the EPA determines a permitting authority is not adequately administering an approved Part 70 program, we will provide notification of the deficiency and, when related to a pollutant in a nonattainment area, apply sanctions as appropriate until the deficiency is resolved. See CAA section 502(i).

¹⁴ See 40 CFR 70.7(a)(2) and 70.7(e)(2)(iv).

¹⁵ See the SDAPCD Rule 1410.

¹⁶ See Finding 5.4 of this report for more discussion on the District's title V source determination.

¹⁷ See Section 7 of this report for more discussion on the SDAPCD's resource management.

¹⁸ See Finding 5.1 of this report for more discussion on the District's title V backlog.

linked to fee payment and renewed annually, new permit conditions can be added or revised each year as applicable. However, these local PTOs do not meet all the requirements for an operating permit required by title V of the CAA.

To implement the title V program, the SDAPCD's title V permits are created by including all the local PTOs and then adding additional sections for facility-wide applicable requirements and title V program-specific conditions such as semi-annual monitoring, annual compliance certifications, deviation reporting, and additional monitoring to assure compliance. The result is that title V sources in SDAPCD have two sets of operating permits with overlapping requirements.

Historically, the SDAPCD only had one title V permit engineer that was assigned all title V permits, and most of the SDAPCD title V permit actions are performed under the conditions of section 502(b)(10) of the CAA (known as a "502(b)(10) change"). When a modification is needed, the general process is that the applicant would submit both an ATC application and a 502(b)(10) change. The ATC/PTO would be issued first, and the 502(b)(10) change would be incorporated later into the title V permit, typically during the renewal.

In our view, to evaluate the SDAPCD's title V program, we must also consider the District's ATC/PTO actions for title V sources because these permit decisions are relied upon to create the District's title V permits and would typically represent title V permit modifications.¹⁹ Throughout this report, when we refer to the District's title V program, we are also generally considering the local ATC/PTO actions for title V sources. However, because the SDAPCD uses separate processes for what it considers to be ATC/PTO and title V permit actions, we will refer to the ATC/PTO permit as the "local permit" to make the distinction when necessary.²⁰

During our site visit, we learned that the SDAPCD is planning to change how the title V program is being implemented. Title V permits will no longer be written and revised by a single engineer, instead the workload will be distributed across permitting staff and more training will be provided. We acknowledge that the SDAPCD has experienced and is still experiencing many changes; we are conducting our evaluation based on what we learned, and we hope to assist the District in its title V program implementation going forward.

Sections 2 through 8 of this report contain the EPA's findings regarding implementation of the title V permit program by SDAPCD.

¹⁹ See Finding 2.4 of this report for more discussion on how the SDAPCD categorize its title V permitting actions.

²⁰ This approach also necessarily affects how title V fees are gathered and spent as the title V fees are viewed as being in addition to the fees collected for the pre-title V permitting program. See our fee-related finding in Chapter 7 of this evaluation report.

The EPA's Findings and Recommendations

The following sections include a brief introduction, and a series of findings, discussions, and recommendations. The findings are grouped in the order of the program areas as they appear in the Title V Questionnaire.

The findings and recommendations in this report are based on the District's responses to the Title V Questionnaire, the EPA's internal file reviews, interviews conducted during the March 28-30, 2022 site visit, and follow-up emails and phone calls subsequent to the site visit.

2. Permit Preparation and Content

The purpose of this section is to evaluate the permitting authority's procedures for preparing title V permits. Part 70 outlines the necessary elements of a title V permit application under 40 CFR 70.5, and it specifies the requirements that must be included in each title V permit under 40 CFR 70.6. Title V permits must address all applicable requirements, as well as necessary testing, monitoring, recordkeeping, and reporting requirements sufficient to assure compliance with the terms and conditions of the permit.

- 2.1 Finding:** The SDAPCD has an internal quality assurance process for reviewing draft versions of permits before they are made available for review by the public and the EPA; however, the understanding of the review process is inconsistent between various groups and varies with level of experience.

Discussion: Based on the interviews, we found that all SDAPCD issued permits undergo an internal review process; however, we received inconsistent answers as to who is involved in the review process for local and title V permits. This is mostly likely caused by the separate procedures used for issuing title V and local permits, where, historically, only one staff person processed title V permits. The SDAPCD does not maintain a clear Standard Operating Procedure (SOP) on the process for issuing local or title V permits. Our overall understanding is that draft local permits go through a more extensive review process than the draft title V permits. Local draft permits are sent to the Compliance Division for review. Then, the draft local permit is sent to the senior engineer in the appropriate Engineering Division section for review. Senior management does not typically get involved in this review unless an unresolved issue requires attention, or a cursory review is needed. After the internal review is complete, the draft local permit is sent to the permittee for review and comment before it is public noticed. In contrast, the permit review process was less clear when discussing title V permits. At a minimum, draft title V permits go to the title V permit manager for review. We received inconsistent responses about whether the Compliance Division reviews them or not.

Many pointed out that there has been extensive turnover within the District,²¹ and communications have not been as effective due to lack of training. There was an even split in response between interviewees regarding whether the Compliance Division reviews the title V permits. Some compliance staff also mentioned they have stopped sending comments to the Engineering Division after repeatedly not seeing feedback being incorporated into permits.²²

Recommendation: The EPA acknowledges that the SDAPCD recently changed how it processes title V permits, and many processes and responsibilities are still in transition. As part of the transition, the SDAPCD should document the procedure of its quality assurance process and provide staff training so the process can be implemented consistently. The EPA suggests that the comprehensive process used for local permits should serve as a starting point for title V permits and that the process address how feedback generated in the internal and permittee review processes are to be considered.

***Response:** The SDAPCD appreciates EPA's recommendation and agrees that additional training is helpful, especially for new staff. The SDAPCD would like to point out that it maintains a manual of procedures (MOP) that describes the permit issuance process in detail. The SDAPCD has already revised portions of the TV procedures for the MOP and implemented them in a draft format and intends to officially modify the MOP as well as train staff on the procedures. This MOP and the MOP revisions were provided to EPA and is contained as a reference in this document. In general since the SDAPCD first issues local Authorities to Construct (ATCs) to modifications to all facilities, including both TV and Non-TV facilities, those ATCs undergo review by Senior Engineers first and then are also sent to Compliance Division for review. Then for TV facilities those local permits, which have already undergone review by both Engineering and Compliance, are then incorporated into TV facility permits either at the time of renewal or revisions. However, some of the engineers who were selected for interview by EPA either had not processed any TV permits or had only processed very few TV permits. As a result, they may have had some differences in their understanding of the TV permitting processes by level of experience, and would not be expected to know all aspects of the TV program. This also explains the differences in understanding of Compliance review since only physical modifications, or modifications involving changes to conditions would need such review (e.g. a 502(b)(10) change would not require review by Compliance).*

²¹ See Finding 7.6 of this report for more discussion on employee retention.

²² See Finding 6.6 of this report for more discussion on compliance permit feedback process.

2.2 Finding: The SDAPCD's statement of basis does not consistently describe regulatory and policy decisions the District has made in the permitting process.

Discussion: 40 CFR part 70.7(a)(5) requires the District to provide "a statement that sets forth the legal and factual basis for the draft permit conditions" and is commonly referred to as the "statement of basis". The purpose of this requirement is to provide the public and the EPA with the District's rationale on applicability determinations and technical issues supporting the issuance of proposed title V permits. A statement of basis documents the regulatory and policy issues applicable to the source and is an essential tool for conducting meaningful permit review.

The EPA has issued guidance on the required content of statement of basis on several occasions, most recently in 2014.²³ This guidance has consistently explained the need for permitting authorities to develop a statement of basis with sufficient detail to document the decisions made in the permitting process. The EPA provided an overview of this guidance in a 2006 title V petition order, *In the Matter of Onyx Environmental Services*, Order on Petition No. V-2005-1 (February 1, 2006) (*Onyx Order*). In the *Onyx Order*, in the context of a general overview statement on the statement of basis, the EPA explained:

A statement of basis must describe the origin or basis of each permit condition or exemption. However, it is more than just a short form of the permit. It should highlight elements that U.S. EPA and the public would find important to review. Rather than restating the permit, it should list anything that deviates from simply a straight recitation of applicable requirements. The statement of basis should highlight items such as the permit shield, streamlined conditions, or any monitoring that is required under 40 C.F.R. § 70.6(a)(3)(i)(B). Thus, it should include a discussion of the decision-making that went into the development of the title V permit and provide the permitting authority, the public, and U.S. EPA a record of the applicability and technical issues surrounding the issuance of the permit. (Footnotes omitted.) See, e.g., In RePort Hudson Operations, Georgia Pacific, Petition No. 6-03-01, at pages 37-40 (May 9, 2003) ("Georgia Pacific"); In Re Doe Run Company Buick Mill and Mine, Petition No. VII-1999-001, at pages 24-25 (July 31, 2002) ("Doe Run"); In Re Fort James Camas Mill, Petition No. X-1999-1, at page 8 (December 22, 2000) ("Ft. James").

Onyx Order at 13-14. Appendix C of this report contains a summary of the EPA guidance to date on the suggested elements to be included in a statement of basis.

²³ Memorandum from Stephen D. Page, Director of the Office of Air Quality Planning and Standards, "Implementation Guidance on Annual Compliance Certification Reporting and Statement of Basis Requirements for Title V Permits," April 30, 2014. See <https://www.epa.gov/sites/production/files/2015-08/documents/20140430.pdf>.

In our review, we found that the statement of basis prepared by the District often does not adequately describe the regulatory and policy issues or document the decisions the District made in the permitting process. Though there is variation, the District's statement of basis generally includes: Introduction/Description; Title V Applicability; Applicable Requirements; Monitoring, Record-keeping, and Reporting; Public Notice and EPA Review; and Conclusions/Recommendations. While these are the types of categories often found in the statement of basis for a title V permit, the District does not consistently include the type of detailed, site-specific information needed in these sections that would allow the reader to understand the District's legal and factual basis for the terms and conditions in the permit.

For example, the District often includes a list of applicable requirements but does not always explain why the source is subject to the requirements or whether an otherwise potentially applicable requirement is not applicable in a particular case. The District could improve this section by consistently explaining why the source meets the appropriate applicability criteria. The section should also not be limited to New Source Performance Standards (NSPS) or National Emission Standards for Hazardous Air Pollutants (NESHAP) but should also include the applicability of all federal applicable requirements, including Compliance Assurance Monitoring (CAM), the Prevention of Significant Deterioration (PSD) permit program at 40 CFR 52.21²⁴, the title IV Acid Rain Program, and State Implementation Plan (SIP)-approved rules.

In addition, the sections dedicated to background and introductory information could be improved by including a description of the various processes and operations at the source, relevant historical information, and the current type of permitting action. While the statement of basis generically describes the changes being made to the permit, the District could improve by providing more context. It should be clear to the reader why the permit needs to be revised and that the revisions the District is making are appropriate for the situation. The District could also consider including a redline/strikethrough version of the permit revisions as part of the permit record provided during the public participation process to facilitate permit review. Furthermore, when streamlining multiple applicable requirements, the statement of basis must explain the requirements being streamlined and how the permit conditions assure compliance.²⁵

²⁴ While the SDAPCD does not have an EPA-approved PSD program, PSD remains a potential applicable requirement to title V sources in SDAPCD. Any EPA-issued PSD permits must be incorporated into the District's title V permits.

²⁵ See Finding 2.7 of this report for more discussion on the SDAPCD streamlining evaluation.

Recommendation: As required by the Part 70 program, the SDAPCD must consistently produce a statement of basis for each title V permit action (initial permits, renewals, and significant and minor revisions) and should commit to improving the content of this document for future permitting actions. We encourage the SDAPCD to work in close coordination with the EPA to ensure that the statement of basis is adequate for explaining the legal and factual basis of each action as required by 40 CFR 70.7(a)(5).

***Response:** The District appreciates EPA's recognition that the SDAPCD's Statement of Basis includes the types of categories typically found in TV permits and the recommendations on further enhancement of the Statement of Basis. Please note that the engineering evaluations of the local permits includes a lot of the detailed and site-specific items mentioned in the EPA's discussion section above, including the streamlining of conditions (also please see response to Finding 2.7). The SDAPCD has consistently provided statements of basis as part of all permitting actions submitted for EPA comment, and had not received comments about lack of content, or any significant deficiency. As indicated the type of analysis is contained in the engineering evaluations for the underlying equipment or in previous statements of basis if the underlying rationale has not changed. The SDAPCD would be happy to further discuss this with EPA.*

2.3 Finding: The SDAPCD uses template permit documents and maintains template conditions in its database to provide consistency in its permits.

Discussion: From staff interviews, most permit engineers refer to previous permitting actions to ensure consistency between permitting documents, especially for the statement of basis.²⁶ The SDAPCD also maintains a list of template permit conditions within its permitting database to assist in permit language consistency.²⁷

The SDAPCD's template title V permit includes a cover page with the Source's general information, responsible official, and signature from an appropriate District official. The template title V permit is divided into six sections: Preamble, Regulation XIV Permit Requirements, Facility-Wide Requirements, Emission Unit Requirements, District-Only Provisions, and Appendices. During the 2008 Evaluation, the SDAPCD's title V permits were not signed by an appropriate District official. The District's title V permit template now includes a District official signature, and the District appears to have resolved its signature issue.

Recommendation: We commend the SDAPCD for promoting consistency between its permit documents using templates. We encourage the SDAPCD to continue improving the statement of basis as discussed in Finding 2.2.

***Response:** The SDAPCD appreciates EPA's finding.*

²⁶ See Finding 2.2 of this report for more discussion of the SDAPCD's statement of basis.

²⁷ See Finding 8.3 of this report for more discussion of the SDAPCD permitting database.

2.4 Finding: The SDAPCD does not evaluate whether a requested title V permit modification meets the criteria under which it is submitted, including confirming whether a change is a modification under title I of the CAA.

Discussion: When changes are made to a Part 70 source, there are several options for the method that must be used to incorporate the change into the title V permit under the Part 70 and District regulations. The District has developed an internal guidance document that defines the criteria to classify the different title V permit revision types and specifies the steps to follow to determine the appropriate revision track. The guidance also describes the type of supporting documentation that should accompany each type of permit revision. This guidance document was provided to the EPA during the file review and should serve as a good resource for the SDAPCD staff to understand the criteria for classifying title V revisions and to provide consistent processing of title V permit changes.

During our file review, we requested 5 years of permit files for the various types of permit modifications (significant modifications, minor permit modifications, administrative amendments, and off-permit changes/502(b)(10) changes). In reviewing these files, we discovered the District consistently does not evaluate whether the type of permit modification requested is correct. Importantly, the District does not document whether 502(b)(10) changes and minor permit modifications are not modifications under title I of the Act, a minimum requirement for using these options. Further, such determinations should include consideration of the PSD program at 40 CFR 52.21 that is implemented by the EPA within San Diego County. The District's rule that references "PSD" requirements, Rule 20.3, is not an EPA-approved PSD program and does not use the correct PSD applicability criteria.

Permitting authorities are not required to produce a statement of basis when processing a 502(b)(10) change; however, we believe it would be beneficial for the SDAPCD to document its analysis verifying that a requested operational change qualifies as a 502(b)(10) change. Otherwise, the regulated community is encouraged to avoid title V program requirements, and potentially title I requirements, by submitting every action as a 502(b)(10) change. We also note that files pertaining to 502(b)(10) changes did not document that the requested changes were eventually incorporated into the title V permit at the time of the next renewal, nor did the District respond when title V sources requested notification whether their changes qualified as 502(b)(10) changes.

Due to the lack of documentation, the EPA was unable to fully assess the SDAPCD staff's understanding of the various permit revision tracks and could not verify whether applications for permit modifications were categorized and processed correctly pursuant to District and federal regulations. When these types of decisions are not consistently documented it can lead to inconsistent implementation of the title V program.

Further, during our 2008 Evaluation we found that the District “streamlines” its NSR and title V actions but did not consistently follow its own rules in doing so by ensuring adequate EPA and public review of NSR actions added to the title V permit.²⁸ It is unclear whether in lieu of using the appropriate procedures in its rules, the District is now instead determining all changes at title V sources qualify as 502(b)(10) changes. See Finding 5.3.

Recommendation: To ensure permitting staff accurately categorize title V permit actions, the SDAPCD should document its actions, rationale, and justification for each title V permit action. The EPA strongly recommends that the SDAPCD consistently review and document whether submitted 502(b)(10) changes qualify for this option, including whether such changes are title I modifications. Since the District is not the PSD permitting authority in San Diego County, the District should also be coordinating with the EPA on whether new sources or modifications at existing major sources are subject to the PSD program.

Response: *The SDAPCD appreciates EPA’s comments and agrees with EPA’s recommendations that all 502(b)(10) changes submitted must be reviewed and determined whether or not they qualify as such. The SDAPCD also agrees with EPA’s recommendation to coordinate with EPA on whether or not new sources or modifications to existing sources trigger PSD requirements. However, the SDAPCD does not agree with EPA’s conclusion that the SDAPCD does not make a determination of the appropriate type of permit action. Under the SDAPCD’s permit program, all Title V applications require that prior to applying for a change to the Title V permit, they must apply for a new or revised permit under the SDAPCD’s local permitting program. The SDAPCD typically discusses all modifications with facilities prior to submittal of an application when preparing the estimate for fees associated with the application. Since fees are heavily dependent on the type of modification, we ask questions to determine whether we think the application will best fit criteria for 502(b)(10), minor or significant modifications. Additionally, 502(b)(10), minor and significant modifications require that the facility also submit an application under the local permitting program to obtain an authority to construct or modified local permit before they can apply for a Title V modification (in practice many facilities submit simultaneously, but we do not process the Title V modification until after the local application has been approved). This means that by the time the Title V application is reviewed, the SDAPCD has already made determinations regarding whether major source NSR requirements applied, any impacts on federally applicable requirements, and monitoring requirements. The engineering evaluation prepared as part of this application review will document these decisions and analysis.*

²⁸ See Finding 5.2 in the 2008 Evaluation

The SDAPCD also disagrees with EPA's contention that EPA and public review somehow does not occur for NSR changes. District Rule 20.3 requires that an EPA comment period and public notice is conducted equivalent to the same level required for significant modifications or new permits prior to an authority to construct being issued. Additionally, if such a notice was required, the Title V application would be treated as a significant modification or an initial permit, as appropriate, and a separate EPA comment period would occur prior to issuance of the Title V permit, as required by SDAPCD rules. Alternatively, at the discretion of SDAPCD and the permit applicant, the project can be processed under "enhanced ATC" provisions, which would combine the two notice/comment periods.

Furthermore, EPA specifically identifies PSD and Title I modifications as concerns. However, these requirements would be addressed during the local permitting review which would include notification to EPA if a project constituted a federal major modification or triggered PSD requirements. In recent years, none of the projects that would have potentially required PSD permits were approved (or were modified to no longer trigger PSD requirements).

It appears that this finding should have been more focused on the lack of clear information to document a determination, rather than concluding that there was a lack of making correct determinations, unless EPA has identified any changes which were improperly classified.

Please note that the SDAPCD provided some of these supporting engineering evaluations to EPA staff as part of the document request, and has included a spreadsheet listing all Title V applications either received or approved within the previously requested timeline, including an annotation regarding the type of application and a brief description of the proposed change. This list shows that the SDAPCD processes each different type of application, not just 502(b)(10) changes. The SDAPCD processes very few significant modifications, but this is due to the types of modifications being proposed, not lack of reviewing requirements. Finally, the District is including/highlighting some additional examples of how it has reviewed the difference between minor/significant changes (Chula Vista Energy Center, APCD2021-APP-006597) as well as an example of a project evaluated as an enhanced A/C in lieu of being processed as a Title V change (Palomar Energy Center, APCD2015-APP-003970 and APCD2015-APP-003971).

- 2.6 Finding:** The SDAPCD generally references the underlying origin and authority for permit conditions, but often does not reference the origin of New Source Review (NSR) requirements.

Discussion: Each title V permit is required to specify and reference the origin and authority for each term or condition and identify any difference in form as compared to the applicable requirement upon which the term or condition is based.²⁹ In most cases, the origin and authority for a permit condition can be referenced by citing to the particular rule or regulation.

²⁹ See 40 CFR 70.6(a)(1)(i).

The District consistently cites a basis for each permit condition; however, its practice of only citing to “NSR” for NSR requirements is insufficient. It is also unclear whether the District incorporates requirements from the District’s ATC’s into the title V permit. Conditions from ATCs remain federal applicable requirements under the California SIP regardless of their inclusion in the PTO.³⁰

For NSR requirements, the *authority* for the permit condition stems from the SIP-approved NSR rule. But, because NSR rules likely do not specify the emissions limits and associated monitoring, recordkeeping, and reporting requirements to which the source is subject to under the NSR determination, the *origin* of the title V permit condition is the actual NSR permit issued to the source. Thus, requirements stemming from NSR rules, or the PSD program at 40 CFR 52.21, should generally cite the underlying rule or regulation as the authority and the specific NSR permit action as the origin.

Recommendation: To address this finding, the District must develop a plan to revise its title V permits to assure that each permit cites the appropriate NSR/PSD permits as part of the origin and authority for a permit term or condition as required by 40 CFR 70.6(a)(1)(i).

Response: The SDAPCD appreciates EPA’s comments and recommendations. However, the SDAPCD would like to clarify that when SDAPCD cites “NSR” as the basis for a condition, it simply cites Rule 20.2 or 20.3 (depending on whether the source is major or non-major for criteria pollutants). This is no different than any other rule citation. The SDAPCD would like to point out that EPA has not previously raised this concern during the review of Title V permits as a comment or an objection.

Also please note that the SDAPCD would like to make a clarification that for example if an ATC condition has already been fulfilled prior to issuance of a Title V permit (such as requirements for initial source testing) the SDAPCD may not place that condition in the Title V permit, since the initial source testing will be completed prior to issuance of the Title V permit.

2.7 Finding: While the SDAPCD appears to streamline applicable requirements in its title V permits, the District generally does not provide the necessary streamlining analysis in the statement of basis.

Discussion: The SDAPCD’s title V permits appear to contain streamlined requirements in which one or more federal/local requirements are subsumed under the most stringent requirement that applies to an emissions unit. For example, the requirements from the NSPS and the same or more stringent District rule requirements are sometimes streamlined into a single permit condition. The District’s statement of basis will sometimes state that the streamlined permit condition is at least as stringent as the subsumed requirements. However, such a blanket statement does not actually demonstrate that the requirement was accurately streamlined.

³⁰ While some ATC requirements not included in the PTO may also not be appropriate for inclusion in the title V permit, this determination should be documented in the statement of basis.

Streamlining applicable requirements is an acceptable practice but must be appropriately documented to assure compliance with all requirements. The EPA most recently provided guidance on streamlining in 2014 in the EPA's April 30, 2014 memorandum, "Implementation Guidance on Annual Compliance Certification Reporting and Statement of Basis Requirements for Title V Operating Permits." The EPA initially provided guidance in our March 5, 1996 guidance document, "White Paper Number 2 for Improved Implementation of The Part 70 Operating Permit Program."³¹

The permit condition should cite to the requirement included in the permit and any subsumed requirements. In addition, the statement of basis should document how the permit condition assures compliance with all subsumed requirements.

Recommendation: As required by 40 CFR 70.7(a)(5), if the District wishes to continue its practice of creating streamlined title V permit conditions, the District must revise its practice by ensuring the statement of basis provides the legal and factual basis for the permit conditions by demonstrating that the permit conditions assure compliance with all subsumed requirements. We further recommend that the District follow the EPA guidance provided above in developing a process to appropriately streamline applicable requirements.

***Response:** The SDAPCD appreciates EPA's comment and recommendation. Please note that, as previously discussed, streamlining typically occurs during the local permit review stage, not as a separate analysis in the Title V Statement of Basis. The SDAPCD typically conducts an equivalent streamlining analysis as part of the local permit review and these conditions are later incorporated into the Title V permit through the appropriate modification application. The District's normal practice is to review requirements rule by rule in the engineering evaluation and then any similar requirements will be automatically streamlined into the permit conditions. This approach ensures all requirements of all rules are reviewed to ensure the permit is enforceable.*

³¹ See Appendix C of this report.

2.8 Finding: The SDAPCD clearly identifies locally enforceable conditions in title V permits.

Discussion: Permit conditions based on state or local rules are only federal applicable requirements if the rule has been approved by the EPA into the California SIP. Some state and local rules are only adopted at the local level and have not been, or will not be, approved into the SIP. State or local rules not approved into the SIP are not federal applicable requirements under the title V program and are only enforceable at the State or District level. During the file review, we found that the District's equipment-specific permits to operate were divided into two main sections: "Federally-Enforceable and District-Enforceable Conditions" and "District-Only Enforceable Conditions." In creating these sections, the District clearly indicates the enforceability of all permit conditions.

However, we note that the District's local permits program is part of the California SIP and permits issued pursuant to these rules are federal applicable requirements.

Recommendation: The EPA commends the SDAPCD for identifying which conditions are federally and locally enforceable in their title V permits. The District should continue this labelling practice and ensure ATC and PTO requirements remain federal applicable requirements.

Response: The SDAPCD appreciates EPA's recognition that SDAPCD identifies federally vs. locally enforceable requirements in the Title V permits and believes that it is important to note that not all requirements, such as some state or local toxics rules, are federally enforceable.

3. Monitoring

The purpose of this section is to evaluate the permitting authority's procedures for meeting title V monitoring requirements. Part 70 requires title V permits to include monitoring and related recordkeeping and reporting requirements. See 40 CFR 70.6(a)(3). Each permit must contain monitoring and analytical procedures or test methods as required by applicable monitoring and testing requirements. Where the applicable requirement itself does not require periodic testing or monitoring, the permitting authority must supplement the permit with periodic monitoring sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit. As necessary, permitting authorities must also include in title V permits requirements concerning the use, maintenance, and, where appropriate, installation of monitoring equipment or methods.

Title V permits must also contain recordkeeping for required monitoring and must require that each title V source record all required monitoring data and supporting information and retain such records for a period of at least five years from the date the monitoring sample, measurement, report, or application was made. With respect to reporting, permits must include all applicable reporting requirements and require (1) submittal of reports of any required monitoring at least every six months and (2) prompt reporting of any deviations from permit requirements. All required reports must be

certified by a responsible official consistent with the requirements of 40 CFR 70.5(d).

In addition to periodic monitoring, permitting authorities are required to evaluate the applicability of Compliance Assurance Monitoring (CAM), and include CAM provisions and a CAM plan into a title V permit when applicable. CAM applicability determinations are required either at permit renewal, or upon the submittal of an application for a significant title V permit modification. CAM regulations require a source to develop parametric monitoring for certain emissions units with control devices, which may be required in addition to any periodic monitoring, to assure compliance with applicable requirements.

3.1 Finding: While the SDAPCD generally reviews CAM applicability, internal guidance needs to be updated and staff need training.

Discussion: CAM regulations, found at 40 CFR part 64, apply to title V sources with large emissions units that rely on add-on control devices to comply with applicable requirements. The underlying principle, as stated in the preamble to our 1997 rulemaking, is “to assure that the control measures, once installed or otherwise employed, are properly operated and maintained so that they do not deteriorate to the point where the owner or operator fails to remain in compliance with applicable requirements.”³² Per CAM regulations, sources are responsible for proposing a CAM plan to the permitting authority that provides a reasonable assurance of compliance with applicable requirements for pollutant-specific emissions units with add-on control devices.

The District reported that there are currently no facilities in its jurisdiction that are subject to the CAM rule. In the permits we reviewed, we found that the District generally explains CAM applicability in its statement of basis. However, CAM applicability can evolve over time as a source makes changes, and thus its applicability should be confirmed during title V renewals and significant modifications to ensure ongoing compliance. During our interviews, we found that permitting staff do not have experience determining CAM applicability. In addition, internal guidance documents may not interpret CAM applicability requirements correctly, as the guidance is too generalized to ensure criteria in the CAM rule is followed. For example, internal guidance appears to incorrectly imply that emissions limits with existing monitoring are not subject to CAM or that being subject to an emissions standard exempt from CAM means that other standards for the same pollutant/unit are also exempt from CAM.

³² 62 FR 54902, October 22, 1997.

Recommendation: The SDAPCD should continue to review CAM requirements as it processes permit renewals and significant modifications and ensure CAM applicability is consistently reviewed and discussed in the statement of basis. Additionally, CAM training should be provided for permitting staff, and the District's internal guidance should be updated to provide more detailed information for determining applicability based on the criteria in the CAM rule.

***Response:** The SDAPCD appreciates EPA's comments and recommendation and welcomes further training on CAM.*

- 3.2 Finding:** The SDAPCD's title V permits generally contain monitoring that is sufficient to determine compliance with emissions limits. However, the SDAPCD's statement of basis does not consistently address periodic monitoring.

Discussion: Our file review confirmed that the SDAPCD's title V permits generally contain appropriate monitoring provisions. Many of the applicable requirements incorporated into the District's title V permits already contain sufficient monitoring (such as, NSR permit conditions, SIP-approved rules, NSPS/NESHAP and use of CEMS for large combustion sources). Source testing, parametric monitoring of control device operation, and associated recordkeeping are used to assure compliance with emissions limits. During our file review, we discovered some permits contained daily emissions limits, but did not appear to contain corresponding daily monitoring/recordkeeping requirements to assure compliance, or the wording of such limits was too vague to determine whether the emissions limits were daily limits or a monthly average.

The SDAPCD does not specifically address in the statement of basis whether additional periodic monitoring is needed. While many applicable requirements may already contain sufficient monitoring, the District does not document whether additional periodic monitoring is, or is not, needed to assure compliance. The EPA has issued guidance that reinforces the need to address periodic monitoring in the statement of basis. Additionally, an Order responding to a petition to the EPA to object to the proposed title V permit for the Chevron Products Company in Richmond, California, dated March 15, 2005, directed the permitting authority to reopen the permit to include either periodic monitoring requirements to assure compliance with regulations or to provide adequate justification in the statement of basis explaining why no periodic monitoring is required.³³

Recommendation: The SDAPCD should continue to ensure that all title V permits have monitoring sufficient to determine compliance, including ensuring daily emissions limits have monitoring conducted on at least a daily basis. Additionally, the statement of basis should evaluate the need for adding periodic monitoring when sufficient monitoring is not specified by an underlying applicable requirement. We recommend the District develop a plan to incorporate review of periodic monitoring for each title V facility at the next permit renewal.

³³ This document is available in the Title V petition database on the EPA website at https://www.epa.gov/sites/default/files/2015-08/documents/conoco_phillips_cbe_decision2004.pdf.

***Response:** The SDAPCD appreciates EPA’s recognition that SDAPCD generally contain appropriate monitoring provisions. As previously mentioned, because the District conducts most review as part of the local permit evaluation, and considers both Engineering and Compliance input prior to a permit being issued. SDAPCD believes that, as EPA’s review has also confirmed, appropriate monitoring provisions have been incorporated into Title V permits. Further, during EPA’s review of Title V permits, EPA has not previously commented or raised objections due to lack of monitoring requirements. The SDAPCD will continue to ensure daily emission limits have adequate monitoring requirements, and believes that reviewing all Title V permits again at renewal for periodic monitoring would be redundant and resource intensive.*

3.3 Finding: The SDAPCD generally includes sufficient recordkeeping requirements as required by the NSPS and NESHAP regulations.

Discussion: During the EPA’s review, we found the SDAPCD generally includes sufficient recordkeeping requirements as required by the NSPS and NESHAP regulations. A specific and prevalent exception pertains to recordkeeping for determining compliance with diesel fuel standards in NSPS Subpart IIII and NESHAP Subpart ZZZZ. The SDAPCD generally does not include a recordkeeping requirement in its title V permits to ensure sources only purchase EPA-compliant diesel fuel as required by these standards. Maintaining fuel purchase records is a standard practice to ensure non-compliant fuels are not entering the market.³⁴

However, as discussed in Finding 2.2, because the statement of basis does not consistently document permitting decisions, it can be challenging to determine whether a permit has incorporated all the applicable monitoring and recordkeeping requirements.³⁵ During our interviews, compliance staff also mentioned they sometimes see enforceability issues in permits while conducting inspections. See Finding 6.6.

Recommendation: The EPA commends the SDAPCD for including sufficient recordkeeping requirements as required by the NSPS and NESHAP regulations. During permit renewals, the District should update their title V permits to require records to assure that only EPA-compliant diesel fuel has been purchased.

³⁴ Records that EPA-compliant diesel fuel was purchased ensures that the fuel meets the sulfur content, cetane index, or aromatic content of 40 CFR 80.510, as required by NSPS IIII and NESHAP ZZZZ.

³⁵ We did, however, find an example where the District incorrectly used the concept of a “replacement unit” to determine NSPS/NESHAP applicability. The District incorrectly determined that replacement of an existing engine with a new engine meant that, despite being a new engine, the NSPS did not apply. While the NSR program may have special provisions for replacement units, those provisions cannot be used to determine NSPS/NESHAP applicability.

***Response:** The SDAPCD appreciates EPA's recognition that SDAPCD generally includes sufficient recordkeeping requirements. With respect to diesel fuel, please note that the SDAPCD includes fuel records in engine permits which are incorporated into Title V permits. Diesel fuel requirements are typically specified in the emission unit specific permit conditions. The District views this as sufficient to ensure only EPA/CARB diesel is used in any diesel powered permitted equipment. For example, the SDAPCD has used the following requirements for a facility which operates an emergency engine which also include streamlined NSPS requirements related to fuel:*

This engine shall only use CARB diesel fuel. (Rule 12, Rule 69.4.1, 17 CCR 93115, 40 CFR 60 Subpart IIII)

The owner or operator of the engine shall maintain the following records on site for at least the same period of time as the engine to which the records apply is located at the site:

(a) documentation shall be maintained identifying the fuel as CARB diesel, and

(b) manual of recommended maintenance provided by the manufacturer.

(Rule 12, Rule 69.4.1, 17 CCR 93115, 40 CFR 60 Subpart IIII)

4. Public Participation and Affected State Review

This section examines the SDAPCD procedures used to meet public participation requirements for title V permit issuance. The federal title V public participation requirements are found in 40 CFR 70.7(h). Title V public participation procedures apply to initial permit issuance, significant permit modifications, and permit renewals. The SDAPCD public participation procedures must provide for public notice, including an opportunity for public comment and public hearing on the draft initial permit, permit modification, or permit renewal. Draft permit actions must be noticed in a newspaper of general circulation or a state publication designed to give general public notice; sent to affected states; sent to persons on a mailing list developed by the permitting authority; sent to those persons that have requested in writing to be on the mailing list; and provided by other means as necessary to assure adequate notice to the affected public.

The public notice must, at a minimum: identify the affected source; the name and address of the permitting authority processing the permit; the activity or activities involved in the permit action; the emissions change involved in any permit modification; the name, address, and telephone number of a person from whom interested persons may obtain additional information, including copies of the draft permit, the application, all relevant supporting materials, and all other materials available to the permitting authority that are relevant to the permit decision; a brief description of the required comment procedures; and the time and place of any hearing that may be held, including procedures to request a hearing. See 40 CFR 70.7(h)(2).

The permitting authority must keep a record of the public comments and of the issues raised during the public participation process so that the EPA may fulfill its obligation under section 505(b)(2) of the Act to determine whether a citizen petition may be granted. The public petition process, 40 CFR

70.8(d), allows any person who has objected to permit issuance during the public comment period to petition the EPA to object to a title V permit if the EPA does not object to the permit in writing as provided under 40 CFR 70.8(c). Public petitions to object to a title V permit must be submitted to the EPA within 60 days after the expiration of the EPA 45-day review period. Any petition submitted to the EPA must be based only on objections that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period.

4.1 Finding: San Diego County contains a significant number of linguistically isolated communities for which the SDAPCD does not consistently provide translation services as required by 40 CFR Part 7.35(a).

Discussion: The SDAPCD's jurisdiction includes sources located throughout San Diego County. In response to California's AB 617 legislation, the District has increased its use of translations and public outreach in certain communities.³⁶ In addition, the District has created an EJ outreach position that is designed to carry out the outreach effort to EJ communities. The EPA prepared a map of linguistically isolated communities within the SDAPCD's jurisdiction in which title V permits have been or may be issued (see Appendix D). The EPA's map indicates that there are numerous populations that are linguistically isolated. These linguistically isolated communities have a significant population density, and thus the SDAPCD should provide translation services in those communities during the title V permitting process. Section 502(b)(3)(C)(6) of the Act and 40 CFR 70.7(h) require a Part 70 program to have adequate procedures for public notice. Using a map like that found in Appendix D may provide additional opportunities to direct the SDAPCD's translation efforts.³⁷

Further, please see 40 CFR Part 7.35(a) for additional detail regarding federal grantee obligations in demonstrating compliance with title 6 of the Civil Rights Act of 1964. In addition, see Appendix D of this report that includes a copy of a recent preliminary decision regarding this topic dated March 30, 2021 from the EPA's External Civil Rights Compliance Office to Carol S. Cromer, Director, Missouri Department of Natural Resources.

Recommendation: The EPA recommends that the SDAPCD provide translation services for linguistically isolated communities within its jurisdiction. The SDAPCD should consider directing translation efforts by using mapping tools as appropriate to assure updated information.

³⁶ This effort is known as the Community Air Protection Program. For a description of the District's response to AB 617, please see <https://www.sdapcd.org/content/sdapcd/community/community-air-protection-program.html>.

³⁷ The use of the State of California's environmental justice tool CalEnviroScreen may also assist in learning where best to deploy translation resources.

***Response:** The SDAPCD appreciates EPA's comment and would like to point out that SDAPCD considers environmental justice (EJ) a high priority and is the first district in California which has an EJ representative on its Governing Board. Also as noted earlier, the SDAPCD has created an Office of EJ and has added significant resources to address public outreach and EJ issues. The SDAPCD posts all Title V public notices to our website and is open to discuss further translation of the notices with EPA. However, please note that the map provided by EPA has too large of resolution to be useful for identifying whether projects need translation. Also, the map only identifies the percentile of linguistic isolation, it does not provide actual percentages of people who are linguistically isolated nor what language they speak. This may lead to somewhat misleading data because of the non-linear nature of percentiles. The SDAPCD agrees with EPA that providing assistance to environmentally disadvantaged communities is a critical issue and is actively taking steps to improve in these areas.*

4.2 Finding: The SDAPCD provides public notices of its draft title V permitting actions on its website.

Discussion: A permitting authority's website is a powerful tool to make title V information available to the general public. Easy access to information that is useful for the public review process can result in a more informed public and, consequently, provide more meaningful comments during title V permit public comment periods.

Currently, the SDAPCD posts relevant title V permit information on its website including, but not limited to, proposed title V permits, statement of basis, public notices, permit appeal procedures, and general title V information and guidance.

The District website provides general information to the public and regulated community regarding the SDAPCD permitting program.³⁸ The public can find information regarding the permitting process, whether a permit is needed for an operation, how to obtain a permit, application forms, and information about related programs that inform the District's permitting program.

The SDAPCD's website also provides a list of active projects that are in the public comment period along with the corresponding draft permit, statement of basis, and public notice that includes information on how to comment electronically or by mail.³⁹

³⁸ See <https://www.sdapcd.org/content/sdapcd/permits.html> and <https://www.sdapcd.org/content/sdapcd/permits/equipment-types/titlev.html>

³⁹ <https://www.sdapcd.org/content/sdapcd/permits/public-notices.html>

The SDAPCD maintains electronic mailing lists for title V public notices and for notification of affected states. Members of the public may sign up for the title V public notice mailing list on the District's website. However, as discussed in Finding 4.1, the District does not currently translate notices of proposed title V permit actions in languages other than English as required by 40 CFR Part 7.35(a). As stated in the introduction, the SDAPCD is developing strategies to enhance public engagement as part of its AB423 commitment.

Finally, in our 2008 Evaluation, we found that the District had been publishing notices of its proposed permits in a newspaper, of which circulation was almost solely among the business community. The District has addressed this issue by publishing its notices of proposed permits in the San Diego Union-Tribune, a newspaper of general circulation.

Recommendation: We encourage the SDAPCD to continue providing information related to title V permits to the public via their website and notifying affected states and interested parties of relevant title V permitting actions via District electronic mailing lists. The District should also provide all final title V permits to the public on its website and must provide translations of notices as discussed further in Finding 4.3.

Response: The SDAPCD appreciates EPA's recognition that SDAPCD maintains an electronic mailing list and publishes the public notices on our website and makes the necessary information related to Title V permits available for public review and comments. The SDAPCD considers public engagement and transparency a priority and will be open to further accessibility of public notices via translating the notices.

4.3 Finding: The SDAPCD provides notification regarding the public's right to petition the EPA Administrator to object to a title V permit.

Discussion: 40 CFR 70.8(d) provides that any person may petition the EPA Administrator, within 60 days of the expiration of the EPA's 45-day review period, to object to the issuance of a title V permit. The petition must be based only on objections that were raised with reasonable specificity during the public comment period.⁴⁰

⁴⁰ An exception applies when the petitioner demonstrates that it was impracticable to raise those objections during the public comment period or that the grounds for objection arose after that period.

San Diego County Rule 1425 contains the required information about the public's right to petition the EPA Administrator to object to a title V permit. In 2008, we made a finding that the District was not informing the public of their right to petition when public noticing title V permitting actions.⁴¹ In our review of the District's draft permit packages for the last five years, including the public notice for the permit action, we found that the District did not inform the public of the right to petition the EPA Administrator to object to a title V permit at the time of the site visit in March. However, the District has recently updated its practice and in the latest public notice, from April 21, 2022, there is new language that incorporates the public petition details.

Recommendation: The EPA commends the SDAPCD for revising its public notice templates to inform the public of the right to petition the EPA Administrator to object to the issuance of a title V permit. The District should have written internal procedures that ensure this remains an ongoing practice.

Response: The SDAPCD appreciates EPA's recognition that the SDAPCD provides the public with the appropriate information on how to petition the EPA Administrator to object to the issuance of a Title V permit.

- 4.4 Finding:** The SDAPCD's general practice is to conduct a concurrent public and EPA review. If comments are received during the 30-day public review period, the permit package is re-proposed to the EPA for a new 45-day review period.

Discussion: Per section 505(b) of the CAA and 40 CFR 70.8, state and local permitting agencies are required to provide proposed title V permits to the EPA for a 45-day period during which the EPA may object to permit issuance. The EPA regulations allow the 45-day EPA review period to occur either following the 30-day public comment period (i.e., sequentially), or at the same time as the public comment period (i.e., concurrently).

⁴¹ See 2008 Evaluation, Finding 4.5.

When the public and the EPA review periods occur sequentially, permitting agencies will make the draft permit available for public comment, and following the close of public comment, provide the proposed permit and supporting documents to the EPA.⁴² When the public and the EPA review periods occur concurrently, a state or local agency will provide the EPA with the draft permit and supporting documents at the beginning of the public comment period. As specified in 40 CFR 70.8 and per SDAPCD's internal guidance, if the SDAPCD receives comments from the public during the 30-day public review period, the 45-day EPA review would be restarted to allow the SDAPCD to prepare responses to the public comments, and an updated permit and Statement of Basis, if applicable, to the EPA. As the permit actions reviewed did not contain public comments, the EPA was unable to confirm this process is being consistently followed at the District. However, the procedures for concurrent public comment and response to comments are well documented in internal District guidance and SOPs.

Recommendation: The SDAPCD's internal guidance appears consistent with the requirements of the title V program and we recommend the District follow its guidance when public comments are received.

Response: *The SDAPCD appreciates EPA's recognition that the SDAPCD's guidance is consistent with the requirements of Title V.*

4.5 Finding: The SDAPCD has a Business Assistance Program (BAP) to conduct pre-application meetings with potential sources to help identify the scope of potential permitting projects and the applicability of regulatory requirements.

Discussion: Under section 507 of the CAA, permitting authorities are required to implement a small business assistance program to assist small businesses that need title V permits. During this evaluation, we found that the District has a full BAP to provide assistance to business owners and operators, small and large, in determining which county, state, and federal requirements are applicable. The assistance includes coverage of title V small businesses.

⁴² Per 40 CFR 70.2, "draft permit" is the version of a permit for which the permitting authority offers public participation or affected State review. Per 40 CFR 70.2, "proposed permit" is the version of a permit that the permitting authority proposes to issue and forwards to the EPA for review. In many cases these versions will be identical; however, in instances where the permitting agency makes edits or modifications as a result of public comments, there may be material differences between the draft and proposed permit.

During the interviews, the BAP staff stated that they help small businesses draft permit applications and review permits to ensure permit records adequately represent the source. This helps the Permitting staff process permit applications in a timely fashion. The BAP staff also assist small businesses with compliance demonstrations by conducting mock on-site inspections and by reviewing the source's draft Annual Emissions Reports to ensure they are adequate before the reports are submitted to the Compliance and Enforcement Section.

Additionally, the BAP staff helps small businesses with pollution prevention by providing guidance on control technologies. For example, they help gas stations understand the benefits of Stage II vapor controls. The District has a BAP website where they describe who they are and provide forms, calculation sheets, and other information to aid businesses developing permit applications. Furthermore, the website has a notification feature available for small businesses in case they want to be made aware when new content is posted on the BAP website.⁴³

Discussions with the BAP staff also indicated that work related to title V sources is tracked so that time spent working with these sources is appropriately accounted for in tracking title V fees and revenue.

Recommendation: The EPA commends the District for its efforts to provide assistance to small businesses and recommends the District continue supporting small businesses by providing these services through its BAP.

Response: The SDAPCD appreciates EPA's recognition of the SDAPCD's small business assistance program.

4.6 Finding: The SDAPCD notifies tribes of title V permitting actions.

Discussion: During our 2008 Evaluation, we did not find evidence that the District notified any tribes in San Diego County regarding title V permit actions. During this evaluation, we found that this issue has been resolved as the District provides notifications to all tribes in San Diego County. Of the 18 Indian reservations in San Diego County, two tribes have been approved by the EPA to be treated in the same manner as a neighboring state for the purpose of "affected state" notification under section 505(a)(2) of the CAA.⁴⁴ Regardless of the affected state status, the EPA believes that state and local air agencies should notify tribal governments when taking significant actions that may affect their air quality.

Recommendation: We commend the SDAPCD for notifying tribes and affected states.

Response: The SDAPCD appreciates EPA's recognition that SDAPCD notifies tribes in San Diego County regarding Title V permit actions.

⁴³ See <https://www.sdapcd.org/content/sdapcd/compliance/business-assistance.html>

⁴⁴ Additionally, the EPA maintains a map on its website of tribes in Region 9 that have received treatment as a state status for purposes of section 505(a)(2) of the CAA: <https://www.epa.gov/caa-permitting/affected-states-notifications-region-9>.

5. Permit Issuance / Revision / Renewal

This section focuses on the permitting authority's progress in issuing initial title V permits and the District's ability to issue timely permit renewals and revisions consistent with the regulatory requirements for permit processing and issuance. Part 70 sets deadlines for permitting authorities to issue each type of title V permit. The EPA, as an oversight agency, is charged with ensuring that these deadlines are met as well as ensuring that permits are issued consistent with title V requirements. Part 70 describes the required title V program procedures for permit issuance, revision, and renewal of title V permits. Specifically, 40 CFR 70.7 requires that a permitting authority take final action on each permit application within 18 months after receipt of a complete permit application, except that action must be taken on an application for a minor modification within 90 days after receipt of a complete permit application.⁴⁵

5.1 Finding: The SDAPCD does not consistently process title V actions in a timely manner, resulting in a permitting backlog.

Discussion: The District does not consistently process permitting applications in a timely manner, mainly due to resource constraints and competing priorities. At the time of our evaluation, the SDAPCD had 28 title V sources and two synthetic minor sources.⁴⁶ Of these 28 sources, the District indicated 75% of sources have a pending renewal application. During the interviews, many expressed time constraints on permit issuance for both local permits and title V permits. Based on the documentation the District provided, there were several permit applications that have not been processed before the 18-month deadline as required by 40 CFR 70.7. In the last 5 years, about 40% of the title V applications received by the SDAPCD have had processing times in excess of 18 months. In addition to exceeding statutory permitting deadlines, delays create issues for the Compliance Division. See Finding 6.1. During interviews, District staff were confident that once the resources issue is addressed, the permitting backlog will no longer be an issue.

Recommendation: The EPA acknowledges that the SDAPCD is currently in transition and more engineers are now being trained and assigned to process title V permit actions. The District should develop a plan of action for reducing its title V renewal application backlog, as well as to process the new title V applications that the District will expect to receive as a result of their new Ozone Non-attainment area classification (See Section 7 of this report for additional discussion on the District's resources).

Response: *The SDAPCD appreciates EPA's comment and recommendation. The SDAPCD would also like to work with EPA to ensure that measures recommended by this Title V program evaluation are implemented in the most efficient way to avoid additional resource constraints and delays in permit reviews.*

⁴⁵ See 40 CFR 70.7(a)(2) and 70.7(e)(2)(iv).

⁴⁶ See Finding 2.4 of this report for more discussion on the SDAPCD's major source determination and Finding 5.4 for more discussion on the SDAPCD's synthetic minor sources.

5.2 Finding: The SDAPCD routinely submits proposed and final permit actions to the EPA.

Discussion: 40 CFR 70.8(a)(1) and the SDAPCD's EPA-approved title V program require that proposed and final permits be sent to the EPA. During our review of recent actions, the EPA found that the SDAPCD routinely submits copies of both proposed and final title V permit actions to the EPA via the EPA Central Data Exchange's Electronic Permit System (EPS). The EPA oversight team receives the SDAPCD's permitting notices. These notices generally include the notice of proposed action, the proposed permit, and the proposed technical support document. However, during our internal file review, we found several instances where a copy of the statement of basis or technical support document for minor permit modifications was not included in the submitted permit package (see Finding 2.4).

Additionally, we could not find a requirement in the SDAPCD's title V rules (District Regulation XIV) that ensures a statement of basis is developed and provided during the public comment period and the EPA's 45-day review period. In 2020, the EPA revised the Part 70 program at 40 CFR 70.7 and 70.8 to make clear that the statement of basis must be made available to the public and the EPA.⁴⁷

Recommendation: The EPA commends the District for submitting its proposed and final permit actions to the EPA for review. The District should also ensure its proposed permits include a statement of basis, consistent with 40 CFR 70.7 and 70.8, and should update its title V rules for consistency with these requirements.

Response: *The SDAPCD appreciates EPA's recognition that the SDAPCD routinely submits copies of both proposed and final Title V permit actions to EPA. As mentioned in the comment above, the SDAPCD has also revised its procedures to require statement of basis for minor modifications. The SDAPCD's revised Title V rules are presently under review by EPA.*

5.3 Finding: The SDAPCD has authority to use parallel processing to streamline the issuance of modified NSR and title V permits. However, it is not clear that this processing method is correctly utilized.

⁴⁷ See <https://www.federalregister.gov/documents/2020/02/05/2020-01099/revisions-to-the-petition-provisions-of-the-title-v-permitting-program>.

Discussion: EPA guidance and regulations allows sources to simultaneously apply for, and permitting authorities to process, revisions to NSR and title V permits.⁴⁸ Under this option, often referred to as “enhanced NSR,” NSR permit modifications are subject to the procedural requirements of the Part 70 program, including a 45-day EPA review period and a 60-day petition period that allows citizens to petition the Administrator to object to permit issuance. After the NSR permit has been issued, and the project has been completed, the permitting authority revises the title V permit to add (or delete) the new or revised NSR conditions via an administrative amendment. The benefits of consolidating the NSR and title V permitting processes include reduced permit processing time and the opportunity for the EPA to review NSR permit actions.

The District appears to understand the enhanced NSR process, dedicating a section to Enhanced Authority to Construct in the Engineering Division Manual of Operating Procedures (Appendix H). The EPA supports this practice; however, our file review did not find evidence that SDAPCD was implementing enhanced NSR. In our file reviews, we did not find an example of an administrative amendment that incorporated NSR permit conditions into a title V permit. However, the District routinely does not incorporate new or revised NSR permit requirements into the title V permit until a title V renewal is issued. Instead, the District may incorrectly be allowing 502(b)(10) changes to be used instead of documenting enhanced NSR practices. See Finding 2.4.

Recommendation: To address this finding, the District must ensure that the applicable permitting procedures required by the Part 70 program are followed. We recommend the District review the Part 70 program requirements related to enhanced NSR and 502(b)(10) changes and develop a plan to address this finding.

***Response:** The SDAPCD appreciates EPA’s recognition that the SDAPCD has included the Enhanced NSR process in the SDAPCD’s MOP. However, it appears that EPA maybe inferring that the SDAPCD is not implementing this correctly while also stating that there are no examples of the SDAPCD using this program (if EPA would like to see an example, the SDAPCD would be happy to provide an example of a permit where an A/C was issued using enhanced procedures and an administrative amendment was filed, but not acted on yet). Also, the SDAPCD does not agree with the EPA’s implication of using 502(b)(10) changes instead of documenting enhanced NSR. Also please refer to response to Finding 2.4.*

⁴⁸ See 40 CFR 70.7(d)(1)(v) and Appendix C: White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995; 11/7/95 letter from Lydia Wegman, OAQPS, to William Becker, STAPPA/ALAPCO; Title V Implementation Q & A, Region 9, December 1995

5.4 Finding: The District does not evaluate the potential emissions from sources without title V permits to determine if they are major sources or whether such sources need synthetic limits to avoid title V applicability or other CAA requirements.

Discussion: A source may accept a voluntary limit (also known as a “synthetic minor” limit) to maintain its Potential to Emit (PTE) below an applicable major source threshold and thereby avoid major NSR permit requirements and/or the need for a title V permit. Sources establish such a limit by obtaining a synthetic minor permit containing practically enforceable emissions limitations from the permitting authority.

According to EPA guidance, synthetic minor limits must be enforceable as a practical matter, meaning they are both legally and practicably enforceable. Additionally, for emissions limits in a permit to be practicably enforceable, the permit provisions must specify: 1) technically-accurate limitations and the portions of the source subject to such limitations; 2) the time period for the limitations (emissions limit averaging period); and 3) the method to determine compliance, including appropriate and practically enforceable monitoring, recordkeeping, and reporting requirements.⁴⁹

In response to a petition regarding the Hu Honua Bioenergy Facility in Hawaii, the EPA stated that synthetic minor permits must specify: 1) that all actual emissions at the source are considered in determining compliance with its synthetic minor limits, including emissions during startup, shutdown, malfunction or upset; 2) that emissions during startup and shutdown (as well as emissions during other non-startup/shutdown operating conditions) must be included in the semi-annual reports or in determining compliance with the emissions limits; and 3) how the source’s emissions shall be determined or measured for assessing compliance with the emissions limits.⁵⁰

The District does not have a policy for setting synthetic minor limits but has two local rules, Rules 60.1 and 60.2, that can be used to limit a source’s PTE. These rules are available to

⁴⁹ *Options for Limiting the Potential to Emit (PTE) of a Stationary Source Under Section 112 and Title V of the Clean Air Act (Act)*, John S. Seitz, Director, Office of Air Quality Planning and Standards (January 25, 1995).

⁵⁰ *Order Responding to Petitioner’s Request that the Administrator Object to Issuance of State Operating Permit Petition No. IX-2011-1*, Gina McCarthy, Administrator (February 7, 2014).

sources seeking to avoid major source status through voluntary requirements. However, the use of these rules appears limited, and the District does not independently determine the facility-wide PTE of the sources it regulates. Instead, the District determines major source status based on actual emissions. While using actual emissions was acceptable for avoiding title V permitting as part of the EPA's 1995 transition policy, that policy expired in 2000.⁵¹

Determining whether a stationary source is a major source and subject to the title V program is based on potential, not actual, emissions.⁵² We found during the evaluation that District permitting staff are generally familiar with calculating the PTE of impacted emissions units when issuing local permits. And the District closely tracks the actual annual emissions of each facility. However, the District does not calculate or track a facility's PTE on a facility-wide basis. Because major source status is based on facility-wide potential emissions, it is challenging for the District to know when an existing minor source becomes a major source or whether a source's claim of being a minor source is accurate. This is particularly problematic for the current situation where the District was recently reclassified as Severe nonattainment for the ozone NAAQS causing the major source threshold in San Diego County for NO_x and VOC to drop to 25 tons per year. Beyond title V applicability, this issue can also have implications in determining NSR program requirements and requirements for major sources of HAPs. This also creates potential enforcement risk for any facility relying on actual emissions to not obtain a title V permit or a major NSR permit.

Recommendation: The SDAPCD must develop a plan for ensuring the District can determine title V applicability according to the definition for "major source" under 40 CFR 70.2 by evaluating the facility-wide PTE. For those facilities with a PTE above the major source threshold that wish to avoid title V permitting, we recommend the District develop internal guidance for permitting synthetic minor sources consistent with EPA policy, and that permitting staff take the EPA's online training for Setting Enforceable Potential to Emit Limits in NSR Permits.⁵³

Response: *The SDAPCD appreciates EPA's comment and recommendation. However, the SDAPCD does not agree that it does not calculate or track the facility's PTE on a facility-wide basis or may not be properly implementing permitting for sources which take synthetic limits to stay out of Title V. The SDAPCD always uses PTE of sources for determining applicability of Title V and NSR requirements. This evaluation is done each time the District reviews an application that is potentially subject to new source review and includes all provisions described in Rule 20.1 including when a calculation requires use of projected actual emissions as potential emissions (such as determining the emission increase associated with a modified emission unit at a major source). While the SDAPCD does not maintain a tabulated list of PTE for all stationary sources, it instead conducts this review at the time a change occurs at a facility.*

⁵¹ See the EPA's December 20, 1999 guidance memorandum "Third Extension of January 25, 1995 Potential to Emit Transition Policy." <https://www.epa.gov/sites/default/files/2015-08/documents/4thext.pdf>

⁵² See definition of "Potential to emit" at 40 CFR 70.2.

⁵³ <https://airknowledge.gov/SI/PERM203-SI.html>

For existing sources, the SDACPD utilizes the actual emissions which are required to be calculated and tracked through our emission inventory program and that Rule 60.1 allows for sources to be exempt from Title V requirements based on having actual emissions one half the major source threshold (a list of such facilities was provided to EPA). This means that by tracking actual emissions and identifying those facilities with emissions above half the threshold, the District has to only assess PTE for those facilities with actual emissions between 50 and 100% of the major source threshold to determine if their PTE is below or at or above 100% of the major source threshold, significantly reducing the resource necessary to identify major sources. Also please note that the SDAPCD evaluates any requirements dependent on facility PTE for NSR during review of the application associated with new or modification of a source.

So to summarize, the SDAPCD does use PTE to determine requirements. However, in lieu of maintaining a tabulated list of facility PTE, the District instead assesses facility PTE at the time each modification occurs and for existing facilities not being modified, tracks actual emissions and compares to the thresholds in SDAPCD Rule 60.1 which means the SDAPCD is using a more stringent screening method to detect Title V facilities than required by the underlying rules. Then for any facility with actual emissions above the thresholds of 60.1 the SDAPCD can conduct an assessment of PTE to determine whether the facility is actually exempt based on PTE.

The second point of this finding refers to synthetic minor permits. SDAPCD would like to provide some clarification as to how the local permitting program ties into Title V permitting. Rule 60.2 is the SDAPCD's synthetic minor source rule and was intended to be used by existing sources that do not have their emissions limited through NSR. However, for the vast majority of facilities, emissions are limited mainly through permit restrictions imposed through NSR Rules 20.2 or 20.3, including appropriate monitoring and recordkeeping, and included in ATCs and PTOs that are therefore federally enforceable limits.

Lastly SDAPCD appreciates EPA's efforts to provide training and will ensure that staff, in particular new staff who may not be familiar with writing enforceable permit conditions, take advantage of such training.

6. Compliance

This section addresses the SDAPCD practices and procedures for issuing title V permits that ensure compliance with all applicable requirements. Title V permits must contain sufficient requirements to allow the permitting authority, the EPA, and the general public to adequately determine whether the permittee is in compliance with all applicable requirements.

Compliance is a central priority for the title V permit program. Compliance assures a level playing field and prevents a permittee from gaining an unfair economic advantage over its competitors who comply with the law. Adequate conditions in a title V permit that assure compliance with all applicable requirements also result in greater confidence in the permitting authority's title V program within both the general public and the regulated community.

6.1 Finding: The District performs Full Compliance Evaluations (FCEs) of all title V sources on a schedule consistent with its negotiated compliance monitoring strategy (CMS).

Discussion: The EPA's 2016 Clean Air Act Stationary Source Compliance Monitoring Strategy⁵⁴ recommends that permitting authorities perform FCEs for most title V sources at least every other year. For the vast majority of title V sources, the EPA expects that the permitting authority will perform an on-site inspection to determine the source's compliance status as part of the FCE. In addition to weekly routine inspections, the SDAPCD has established its inspection priority, giving emphasis to sources receiving ongoing public complaints, sources with issues of continued non-compliance, and sources that need follow-up due to a Notice of Violation (NOV).⁵⁵ During interviews, District inspectors indicated that quarterly compliance evaluations and annual full inspections are conducted for all permitted equipment. However, District inspectors also indicated that the effectiveness of the inspection schedule may be compromised due to delays in processing open permit applications.

Recommendation: The EPA commends the District's ongoing efforts to perform FCEs of all title V sources annually.

Response: The SDAPCD appreciates EPA's recognition that the SDAPCD performs FCEs for all Title V sources annually.

6.2 Finding: The District's Compliance Division reviews all title V deviation reports, annual compliance certifications, and semiannual monitoring reports submitted by Part 70 sources.

Discussion: During interviews, the District's compliance staff indicated that all deviation reports, quarterly monitoring reports, and compliance certifications that sources submit to the agency are reviewed by inspectors. Supervisors and the Chief of Compliance Division review reports as necessary. The SDAPCD tracks these reports through their internal database and reviews these records through their compliance staff and supervisors. If NOVs are warranted after reviewing a report, the inspectors are required to discuss the documented deficiency with the facility prior to issuing the NOV, to explain the nature of the violation, and advise the site to respond to NOVs timely with the actions needed to return to compliance or prevent future violations prior. Compliance supervisors will review the violation and associated report and are responsible for approving NOVs.

⁵⁴ This document is available at: <https://www.epa.gov/compliance/clean-air-act-stationary-source-compliance-monitoring-strategy>.

⁵⁵ See *Inspection Practices and Priorities*, SDAPCD Compliance Division Policy and Procedures Manual, Policy number 2.1, effective date September 1, 1998, revised on July 25, 2016.

In addition, engineering staff indicated that deviation reports and compliance certifications are typically not routinely reviewed during permit processing. For example, reviewing these documents as part of the title V permit renewal process could indicate a need to increase testing frequency or require different monitoring that would ensure compliance.

Recommendation: The EPA commends the SDAPCD's efforts in reviewing and tracking all deviation reports, quarterly monitoring reports, and compliance certifications. We encourage the SDAPCD to coordinate the outcomes of compliance issues with permitting staff. See Finding 6.6.

Response: *The SDAPCD appreciates EPA's recognition that the SDAPCD reviews and tracks all deviation reports, quarterly monitoring reports and compliance certifications and agrees with coordinated effort between compliance and permitting staff.*

- 6.3 Finding:** When potential compliance issues are discovered, the District addresses them prior to permit issuance. However, the District's statement of basis could be improved to include compliance history.

Discussion: The Part 70 program requires that each title V permit contain a schedule of compliance if necessary.⁵⁶ This includes ensuring title V permits contain requirements that ensure sources comply with requirements that have future compliance dates and ensure that title V permits contain enforceable milestones leading to compliance for those requirements for which the source is not in compliance. Based on interview responses, the District has not recently issued permits with compliance schedules. Instead, compliance staff will generate a citation report, which is sent to the District's Civil Actions Investigator to determine the corresponding penalty. Pending permit applications are not processed until a facility comes back into compliance. This practice does not appear to significantly affect or delay the issuance of permits.

Recommendation: We recommend the compliance section in the District's statement of basis be improved to include the source's compliance history and the actions being taken to address compliance issues, as applicable.

Response: *The SDAPCD appreciates EPA's recognition that the SDAPCD does not issue a permit until compliance issues are addressed. Please refer to earlier responses related to the information provided in the local permit engineering evaluations vs statement of basis.*

⁵⁶ See 40 CFR 70.6(c)(3) and 70.5(c)(8).

6.4 Finding: The District uses title V compliance certifications and semiannual monitoring reports to prioritize inspections and initiate enforcement actions.

Discussion: Similar to our 2008 Evaluation, the District continues to prioritize inspections and initiate enforcement actions by using title V compliance certifications and semiannual monitoring reports.⁵⁷ The District's Compliance Division has a policy for reviewing annual compliance certifications and semiannual monitoring reports (which include deviation reports).⁵⁸ The District uses these title V compliance reports as well as past violations, recent applications and activities to prioritize and target inspections. Interviewees stated that they review these reports for compliance issues. They also review the facility's compliance history, including recent inspections, breakdowns, exceedances, or violations, if any. The District uses this information to prioritize inspections.

The District has also initiated enforcement actions at title V facilities based on information from compliance certifications and semiannual monitoring reports. In one example, the District issued an NOV for a violation identified in a title V report. The violations were related to time periods when the facility failed to maintain NO_x and O₂ CEMS per Appendix B of 40 CFR Part 75. Since the violations were short-term (i.e., not ongoing) and the facility was not out of compliance at the time of permit issuance, a schedule of compliance was not required.⁵⁹

Interviewees were generally knowledgeable about the procedures for reviewing title V compliance reports and were aware of the District's policy for title V report reviewing process, for issuing a NOV and/or a Notice to Comply (NTC).

Recommendation: The EPA encourages the District to maintain its practice of using title V compliance reports to prioritize and target inspections and to continue implementing its policy for reviewing these reports.

Response: The SDAPCD appreciates EPA's recognition of the SDAPCD's practice to use compliance certification reports to prioritize and target inspections.

⁵⁷ See 2008 Evaluation, Finding 6.1.

⁵⁸ See *Review of Title V Semiannual and Annual Reports*, SDAPCD Compliance Division Policy and Procedures Manual, Policy number 3.13, effective date April 4, 2002, revised in August 2018.

⁵⁹ A schedule of compliance is required for Title V sources that are not in compliance with all applicable requirements at the time of permit issuance. (See 40 CFR 70.5(c)(8)(iii)(C).)

6.5 Finding: Compliance staff have the necessary equipment to perform their job duties but find the procurement process for new equipment to be slow.

Discussion: During interviews, members of the Compliance Division stated that they have sufficient tools and safety equipment to perform inspections, including hard hats, safety glasses, safety vests, and an annual voucher for safety shoes. At the same time, employees also expressed the need for new monitoring equipment as existing equipment, including Thermo Fisher Scientific analyzers, are experiencing a loss in functionality due to age. Though the process for equipment repairs and purchases have been initiated, they have been slow. Compliance staff also mentioned that they could have been supplied with better personal protective equipment during the COVID-19 pandemic.

Recommendation: The EPA recommends that the District review its equipment needs and plan in advance for the replacement of old and outdated equipment to expedite the procurement process.

Response: The SDAPCD appreciates EPA's recognition that SDAPCD Compliance has sufficient tools and safety equipment to perform inspections and will continue to explore opportunities to expedite the procurement process for such equipment.

6.6 Finding: While the SDAPCD has a process in their internal database for compliance staff to request changes to title V permits, it is unclear if it is being used consistently.

Discussion: In our 2008 Evaluation, we found that the SDAPCD did not have a clear track record of utilizing the District's internal Request for Change of Permit Conditions form to make corrections to title V permits, and that the decisions made by the Engineering Division on such requests were seldom communicated back to the Compliance Division. The District has since developed a policy for the use of such request forms. Under the Division policy, compliance staff are expected to review all permit conditions during the annual inspection and submit a Request for Change of Permit Conditions form to the Division Chief if a site-specific permit condition is found to not be clear, enforceable, or consistent with existing rules and/or other applicable requirements. The Division Chief is responsible for keeping the inspector and their supervisor informed of any decision.⁶⁰ For issues identified across multiple permits, the policy states these issues should be forwarded to the District's Permit Streamlining Committee for evaluation.

⁶⁰ See *How to Submit Permit Change Requests*, SDAPCD Compliance Division Policy and Procedures Manual, Policy number 2.18, effective date February 17, 2016, revised in July 2017.

During interviews, inspectors said they have used the request change forms in the District's database system to request changes to the title V permits. Interviewees expressed concern about the length of time it takes for changes identified to be made and about the Engineering Division's lack of action on some requests. Compliance staff noted that some permits were not updated in a timely manner to make the permit conditions enforceable. In some cases, this resulted in NOVs being issued that compliance staff believe would have been unnecessary if the permit had included monitoring and recordkeeping that facilitated compliance with the requirements in the permit.

While the Permit Change Request process appears to be a good mechanism for inspectors to request correction of obvious errors, or minor administrative changes, compliance staff may have stopped using the process based on historical lack of response from the Engineering Division.

Recommendation: Engineering and Compliance Divisions should agree on a realistic Permit Change Request process, including the types of changes that should be made and the appropriate timeframe for doing so, so that both Divisions can work together to ensure enforceable permits.

Response: The SDAPCD appreciates EPA's recognition that there is a formal process in place for Compliance to request changes to permit conditions and agrees that a realistic expectation with appropriate timeframe be established. Please note that the SDAPCD had already begun work on addressing this issue. One point to consider is that in order to change permit conditions, the SDAPCD has to follow the formal process which makes it clear that some condition changes to Title V permits would require an EPA comment period and, in some cases, public notice and public review. This means that the Title V permits can't just be simply revised without going through Title V permits revision requirements. For this reason, some of the requested condition changes in the past have been scheduled to be included with the next permit modification or renewal to avoid multiple permit revisions and EPA or public noticing and reviews.

7. Resources and Internal Management

The purpose of this section is to evaluate how the permitting authority is administering its title V program. With respect to title V administration, the EPA's program evaluation: (1) focused on the permitting authority's progress toward issuing all initial title V permits and the permitting authority's goals for issuing timely title V permit modifications and renewals; (2) identified organizational issues and problems; (3) examined the permitting authority's fee structure, how fees are tracked, and how fee revenue is used; and (4) looked at the permitting authority's capability of having sufficient staff and resources to implement its title V program.

An important part of each permitting authority's title V program is to ensure that the permit program has the resources necessary to develop and administer the program effectively. A key requirement of the Part 70 program is that the permitting authority establish an adequate fee program to ensure that (1) title V fees are adequate to cover title V permit program costs, and (2) are used solely to cover the

permit program costs. Regulations concerning the fee program and the appropriate criteria for determining the adequacy of such programs are set forth in 40 CFR 70.9.

7.1 Finding: The SDAPCD staff report that they receive effective legal support from the District Counsel's office.

Discussion: In our 2008 Evaluation,⁶¹ we stated that the SDAPCD staff receive expert, knowledgeable, and experienced legal support. Since then, the District Counsel in place during our 2008 Evaluation retired and another District Counsel was hired with equally effective results. However, as a result of the recent change in leadership, the District, at the time of our site visit, was in the process of hiring a new District Counsel. The District's legal support is currently in transition but given the record of effective legal support for the title V program and District management's understanding of the importance of this function, the EPA expects that District staff will continue to receive effective legal support for the District's title V program.

Recommendation: The SDAPCD should continue to ensure that it receives effective legal support for the Part 70 program.

Response: The SDAPCD appreciates EPA's recognition that the SDAPCD staff receives effective support from the SDAPCD's Counsel. The SDAPCD has a new District Counsel, Veera Tyagi, who has extensive experience in air quality programs. Prior to joining SDAPCD, Ms. Tyagi worked as a Principal Deputy District Counsel at South Coast Air Quality Management District. We are very happy and excited to have Veera working as our Counsel and she can provide expert legal support on all Title V and other air quality matters.

7.2 Finding: The District tracks title V program expenses and revenue and those funds are spent solely to support the title V program.

Discussion: The Part 70 regulations require that permit programs ensure that the collected title V fees are adequate to cover title V permit program costs and are used solely to cover the permit program's costs.⁶² In our 2008 Evaluation, the EPA did not closely review title V fee accounting as the District's program at the time was not experiencing any staff shortages, nor delays in its permit processing times. In this more recent effort, the SDAPCD provided accounting data for the prior 3 years. As noted elsewhere in this report, prior to the title V

⁶¹ 2008 Evaluation, Finding 7.2.

⁶² See 40 CFR 70.9(a).

program, the SDAPCD was already implementing its own permitting program. When the Part 70 requirements took effect, the SDAPCD treated the Part 70 requirements as an overlay to the existing SDAPCD permitting program. As a result of this approach, the SDAPCD treated the revenue and expenses associated with the Part 70 program as supplemental to the revenue and expenses associated with the existing local permitting program. Thus, the combination of their base permitting program and the additional Part 70 requirements that apply to title V sources result in the full program as implemented by the SDAPCD. Using an approach based on full cost recovery, the SDAPCD ensures that it collects fees for its base permitting program and the supplemental title V costs (including overhead, compliance costs, etc.) that match the expenses used for implementing the supplemental title V program requirements. See Appendix F for details regarding their accounting approach.

As discussed in Findings 5.1 and 7.6, the District has a title V permitting backlog and is experiencing difficulty retaining permitting and compliance staff. Further, Finding 2.4 discusses that the District may be processing all changes at title V sources as 502(b)(10) changes instead of expending resources to process changes according to the correct permit revision type. While the District's accounting approach is consistent with the Part 70 program requirements, it is not clear whether those fees will be sufficient going forward to fully administer the program.

Recommendation: The EPA commends the SDAPCD for their approach to accounting for both revenue and expenses for the implementation of the title V program. During the evaluation, the EPA provided the SDAPCD with the most recent EPA policy on title V funding (see appendix E). We recommend the SDAPCD review the policy to assure their fee program continues to be consistent with EPA title V fee policy and that fees will be sufficient going forward.

Response: *The SDAPCD appreciates EPA's recognition that the SDAPCD tracks Title V revenues and expenses and spends such funds solely to support the Title V program. Also the SDAPCD appreciates EPA's additional Title V funding information and guidance provided to us.*

7.3 Finding: The District permitting and compliance management communicate well and meet routinely to discuss programmatic issues. However, the results of these discussions are not clearly and consistently communicated to compliance staff and has resulted in uncertainty regarding outcomes of issue resolution among compliance staff.

Discussion: In our 2008 Evaluation, we found that permitting decisions were not always clearly communicated among the SDAPCD's engineering and compliance staff.⁶³ During this evaluation, we found the lack of communication and coordination at the staff level persists. The SDAPCD's compliance and engineering management continue to hold routine meetings to discuss permitting and compliance issues; however, such meetings are not held regularly at the staff level. Although the District's permitting staff indicated that draft permits for unique sources are sent to Compliance for review, the District's compliance staff indicated that draft permits are rarely sent to the Compliance Division for review prior to the public comment period.⁶⁴

⁶³ See 2008 Evaluation, Finding 7.1.

⁶⁴ See Finding 6.6 of this report for more discussion on compliance permit feedback process.

Permitting staff, as a practical matter, should be accessible to the compliance staff for consultation on practical enforceability, applicability determinations, and compliance determinations. Having a systematic process, especially in cases that involve more than one group within the District, would reduce the time necessary to resolve complex issues and minimize potential delays in permit issuance or in appropriate enforcement action.

Recommendation: The EPA commends the SDAPCD's effort to maintain good communication between permitting and compliance management. However, we encourage the SDAPCD to promote increased communication and cooperation between permitting and compliance staff, and to explore ways to improve permitting decisions among SDAPCD's engineering and compliance staff.

Response: The SDAPCD appreciates EPA's comment and recommendation and will continue to identify opportunities to promote effective communications.

7.4 Finding: The District lacks a training plan for its permitting and compliance staff.

Discussion: As noted elsewhere in this report, the District's title V permitting program is experiencing staff retention challenges. In addition, we identified several substantive issues related to permit preparation and content indicating a need for further title V training in order to prepare more effective permits (See Section 2). In interviews, staff identified title V training, primarily focusing on permit writing and inspections, as something that would improve the District's title V program. District staff specifically suggested training on federal regulations (NESHAPs and NSPS), would improve staff's familiarity with regulatory requirements and help permit writers identify how best to incorporate these requirements into title V permits. The EPA has separately identified training needs related to CAM and other critical program elements and policies.

For Compliance, it appears that the amount and content of trainings for inspectors varies from supervisor to supervisor, and that the Compliance Division has no formal training plan, training material, or standardized procedure. Training is heavily focused on shadowing experienced inspectors in the field. Staff and managers acknowledged that they would likely benefit from standardized training.

Recommendation: The District should identify core training needs and develop a curriculum that title V program staff, both permitting and compliance, should complete to enhance title V program understanding and improve permit writing and compliance determinations.⁶⁵

⁶⁵ In other title V program evaluations, the EPA has found good examples of the type of training and curriculum that the District may find most useful. For example, see Finding 7.4 on pages 33 and 34 of the EPA's "Bay Area Air Quality Management District title V Operating Permit Program Evaluation Final Report September 29, 2009", which is available on the EPA's website at <https://www.epa.gov/sites/default/files/2015-07/documents/bayarea-final-report9-29-09.pdf>.

Regulatory updates sent by EPA Region 9 can also be shared with staff as it contains relevant updates to NSPS and NESHAP requirements and can be used as reference material for finding relevant information on the EPA's website.⁶⁶ Additionally, the District should encourage staff to network with staff from other agencies by allowing them to participate in other learning opportunities such as conferences, workshops and online trainings/webinars.

Response: The SDAPCD appreciates EPA's recommendations and looks forward to partnering with EPA to identify additional training opportunities.

- 7.5 Finding:** Permitting staff demonstrated a general lack of knowledge on environmental justice (EJ) and would like the EPA to provide training on this issue.

Discussion: As noted in the 2008 Evaluation, the District's permitting staff is generally not familiar with EJ issues and how these issues may arise in a permitting context.⁶⁷ As a result, there is uncertainty about tools that may help them address EJ issues and inform the public more effectively of permitting actions. In the EPA's prior evaluation, the EPA committed to providing EJ training but was unable to do so given resource constraints at the time. However, in January 2022, the EPA held a two-day training for Region 9 permit writers on EPA's EJScreen tool and provided case studies from across Region 9 for implementing EJ in permitting.

One of the tools available to help anticipate where EJ issues may arise with permitting actions is the EPA's EJScreen tool. This tool can be used to prepare maps that highlight specific demographic data for use in focusing outreach, for example. The EPA suggests that the District examine the maps provided in the appendices to this report (including the linguistic isolation map – see Appendix D) to familiarize staff with the EJScreen tool and its capabilities in identifying communities where additional outreach on permitting actions may be warranted.⁶⁸

Recommendation: We recommend the District permitting and compliance staff coordinate with the District's new OEJ to assist with EJ considerations in permitting. The EPA will continue to share new information related to EJ in permitting as it becomes available.

Response: The SDAPCD appreciates EPA's recommendation and believes that EJ is a top priority and EJ considerations must be integrated into all programs.

⁶⁶ For example, recent updates provide a link to the federal government's new "eCFR" website that can be used to compare versions of federal regulations to see what has recently changed. This feature can be helpful when working on a title V renewal action.

⁶⁷ See, e.g., <https://www.epa.gov/sites/production/files/2015-07/documents/ej-permitting-fags-4.29.pdf>

⁶⁸ For an overview of the EJScreen tool, please see <https://www.epa.gov/ejscreen>. For learning resources on EJScreen, please see <https://www.epa.gov/ejscreen/learn-use-ejscreen>. CalEnviroScreen, a similar tool available in California, would provide similar information.

7.6 Finding: The SDAPCD is having difficulty retaining permitting and compliance staff.

Discussion: During interviews staff noted that the District compliance and permitting staff are compensated in accordance with the San Diego County compensation structure as opposed to the District having its own compensation structure tailored to the unique knowledge, skills and abilities of the District's air quality professionals.⁶⁹ It is unclear to EPA whether or not the District has the ability to set its own compensation structure separate from the County's compensation structure. Interviewees noted that though recent open positions have been advertised as open to those with no experience as well as to those candidates who may have more experience, the District has typically hired less experienced candidates for whom permitting and compliance positions may be more challenging and will require a comprehensive training program in order for less experienced staff to reach a level of competence necessary to confidently prepare for participation in the title V program (both permit preparation and permit compliance determinations). The results of our interviews suggest that the District should focus on succession planning to better prepare for the event that staff leave the District. Finally, staff noted that because the career ladder seems limited in terms of advancement opportunity, some employees leave for other County departments where career ladders provide more advancement opportunity and therefore higher compensation.

Impacts of high staff turnover rate include: (1) a workload situation in which certain key title V program tasks are or may not be completed in the timeframe required by District rules and the Part 70 program and (2) a lack of institutional knowledge at the staff level within the District's permitting and compliance programs.

⁶⁹ The District has a performance and recognition program that typically provides a \$100 to \$150 monetary award and certificate for high performers.

Recommendation: Staff turnover can erode an agency’s institutional knowledge, which can create delays in the issuance of title V permits and lead to inconsistent permitting determinations.⁷⁰ Based upon discussions with the District’s permitting and compliance staff, the EPA believes that a compensation analysis is needed and may lead to a system in which staff can demonstrate growth through their careers in a way that is comparable to what other County departments offer, reduce the frequency of staff turnover, and lead to additional opportunities for qualified candidates for senior positions within the permitting and compliance groups. The District should also consider conducting a workload assessment to determine the number of additional staff persons needed to implement its title V program taking into consideration the new ozone area classification and the expected additional title V work that will result. As noted in the discussion above, in the event that the District has the ability to independently set a compensation structure that can be better tailored to the unique knowledge, skills and abilities of the District’s air quality professionals, the District may want to take the opportunity to do so to address this finding. In the alternative, the District should work with the County administration to act on the results of the analyses identified in this recommendation.

Response: The SDAPCD appreciates EPA’s comments and recommendations. A compensation analysis was recently conducted for the Service Employees International Union (SEIU) (Titled Base Salary Compensation Study, by Koff & Associates, dated September 29, 2021, independently from SEIU and the County of San Diego, [San Diego Final Comp Report 09 29 21.pdf - Google Drive](#)). This analysis, conducted for all represented SDAPCD employees, considered several other local air pollution control districts, such as San Luis Obispo County APCD, Bay Area AQMD, Imperial County APCD, Sacramento Metro AQMD and South Coast AQMD. Also the County Contract for SEIU compensation package was approved by the San Diego County Board of Supervisors in June 2022 ([County Contract \(seiu221.org\)](#)).

The SDAPCD, like other entities, experienced a high turnover after the COVID-19 pandemic, increasing the number of vacancies. The SDAPCD is committed to continuing to monitor the workload and explore opportunities to provide adequate resources and fill vacancies with the best candidates to address any potential retention issues.

⁷⁰ In the EPA’s 2008 Evaluation, we noted that the District had considerable experience in its title V program (see findings 2.2 and 7.3 of our 2008 Evaluation).

8. Records Management

This section examines the system the SDAPCD has in place for storing, maintaining, and managing title V permit files. The CAA provides that certain documents created pursuant to the title V permitting program, including the permit application, be made available to the public but also allows some protections for confidential information.⁷¹ The SDAPCD has a responsibility to the public in ensuring that title V public records are complete and accessible.

In addition, the SDAPCD must keep title V records for the purposes of having the information available upon the EPA's request. 40 CFR 70.4(j)(1) states that any information obtained or used in the administration of a State program shall be available to the EPA upon request without restriction and in a form specified by the Administrator.

The minimum Part 70 record retention period for permit applications, proposed permits, and final permits is five years in accordance with 40 CFR 70.8(a)(1) and (a)(3). However, in practical application, permitting authorities have often found that discarding title V files after five years is problematic in the long term.

8.1 Finding: The SDAPCD has successfully converted all permitting hard copy files to electronic files and stores historical physical title V permit files in a central records center.

Discussion: According to the SDAPCD, they have digitized all their files and any physical files are archived in a separate records center. During our site visit, most interviewees stated that they do not normally use any hard copies, and if they do, it is due to personal preference. This conversion helped greatly during the COVID-19 pandemic.

Recommendation: The EPA commends the SDAPCD on its conversion to all electronic files.

Response: The SDAPCD appreciates EPA's recognition that the SDAPCD has successfully converted all permitting documents into electronic files.

8.2 Finding: The SDAPCD has improved its written file retention policy. However, most staff are not aware of the District's record retention schedules.

⁷¹ This protection, however, is not absolute as the types of information that may be treated as confidential, and therefore withheld from the public, is limited. Specifically, "[t]he contents of a permit shall not be entitled to [confidential] protection under section 7414(c) of this title." CAA section 503(e), referring to section 114(c) of the CAA which provides protection of certain confidential trade secret information – but not emissions data – from disclosure. In addition to the title V program requirements, confidentiality is also addressed in the EPA's regulations governing the disclosure of records under the Freedom of Information Act (FOIA). Pursuant to those requirements, information which is considered emissions data, standards or limitations are also not entitled to confidential treatment. See *In the Matter of ExxonMobil Corporation, Baytown Refinery*, Order on Petition No. VI-2016-14 (April 2, 2018) (Baytown Order)

Discussion: Similar to our 2008 Evaluation, the SDAPCD has a written file retention policy for retaining, managing, and disposing of official records; however, most staff are not aware of the District's record retention schedules.⁷² Previously, for permit-related records, the District's records retention schedule required that permit files, including title V permit files, be retained for a total of nine years—two years after completion of a project at the District's office (onsite) and seven years off-site. The schedule did not specifically address the retention time for title V-related compliance records, which include compliance certifications, deviation reports and semiannual monitoring reports. While the District's record retention schedule contained a general section on compliance and enforcement documents, the schedule only required that the District retain these documents for up to three years. With the current file retention policy,⁷³ title V documents are maintained while a permit is still active and then an additional five years after the permit is terminated. The title V compliance files are also now explicitly listed with a retention time frame of five years.

Recommendation: The EPA commends the SDAPCD on having a written file retention policy that complies with the federal regulation. We recommend that the District provide training to staff on its records management policies.

Response: The SDAPCD appreciates EPA's recognition that the SDAPCD has a written file or records retention policy and agrees to provide further training in this area.

8.3 Finding: The SDAPCD uses an electronic database to track title V permits and continues to make database improvements.

Since our 2008 Evaluation, the SDAPCD has replaced its previous permitting database, VAX, to a web-based Business Case Management System (BCMS). Generally, most District staff believe it is an improvement from VAX and that it is good at both storing electronic communications and tracking information. For example, final permitting documents, public comments, and email exchanges relating to the permit are captured in the database. The BCMS can track compliance reports and violations, generate site history and productivity reports for inspectors, and create a priority list of inspections each quarter. The system also currently stores annual/semi-annual reports, generates site history report, and generates priority list of inspection on quarterly basis. The system can also generate a report of pending applications and track application deadlines.

⁷² 2008 Evaluation, Finding 9.2.

⁷³ Appendix G – Record Retention Schedule.

The BCMS was not originally designed for the title V program. For instance, BCMS can generate a report of all title V applications but cannot distinguish between different types of title V applications. Further, the BCMS does not currently track synthetic minor⁷⁴ and title V sources explicitly. When the EPA requested data on the processing times for the District's title V permits, the SDAPCD had to work with the developers for about three weeks to get that query created. However, after the query was created, the turnaround time for similar processing time requests was significantly shortened. The District continues to work with developers to upgrade the permit and compliance report generation capabilities.

As mentioned in Finding 2.3, the BCMS stores permit conditions used in permits to help with consistency from permit to permit. However, if modifications are made to a condition stored in the database, a new template condition is generated in the database and sometimes it is difficult to track which template condition to use. When the template permit condition is updated, it also does not universally update all the permit conditions where the template was used, the District has to manually update each permit that contains that template condition.

Generally, District staff suggested that even though the BCMS is workable, it is generally slow, not very effective, and information can be difficult to retrieve sometimes. The BCMS has limited workflow tracking capabilities and ability to track fees and calculations. There's currently no streamlined process that moves a permit application through different stages of review within the system.

Recommendation: The EPA encourages the SDAPCD to continue to improve BCMS or explore other database options to help manage and track its permitting and compliance tasks.

Response: The SDAPCD appreciates EPA's recognition that the SDAPCD uses an electronic data base to track Title V permits and the SDAPCD is actively working on BCMS enhancements.

⁷⁴ See Finding 5.4 of this report. Actual emissions of individual equipment are recorded as the PTE, and facility-wide PTE is not tracked

DRAFT

Appendix K. Titled Base Salary Compensation Study



Koff & Associates
A Gallagher Company

September 29, 2021

Base Salary Compensation Study Final Report

County of San Diego

KOFF & ASSOCIATES

KATIE KANEKO

Managing Director

2835 Seventh Street
Berkeley, CA 94710
www.KoffAssociates.com

kkaneko@koffassociates.com

Tel: 510.658.5633

Fax: 510.652.5633



September 29, 2021

County of San Diego
Attention: Human Resources
1600 Pacific Highway
San Diego, CA 92101

To Whom It May Concern:

Koff & Associates is pleased to present the Total Compensation Study Final Report to the County of San Diego. This report documents the market compensation survey methodology, findings, and recommendations for implementation.

We would like to thank the County and SEIU for the regular meetings, interest, assistance, and cooperation without which this study could not have been brought to its successful completion.

We will be glad to answer any questions or clarify any points as you are implementing the findings and recommendations. It was a pleasure working with the County and we look forward to future opportunities to provide you with professional assistance.

Very truly yours,

Katie Kaneko
Managing Director



TABLE OF CONTENTS

EXECUTIVE SUMMARY.....	1
Background	1
Summary of Findings	1
STUDY PROCESS.....	1
Classifications Survyed.....	1
Comparator Agencies.....	2
Salary Data.....	4
Cost of Labor Differential.....	4
Data Collection.....	6
Matching Methodology	6
Data Spreadsheets.....	7
INTERNAL SALARY RELATIONSHIPS.....	7
MARKET COMPENSATION FINDINGS	9
Base Salary	9
Cost.....	10
RECOMMENDATIONS.....	20
Pay Philosophy.....	20
Options for Implementation.....	20
PAY PREMIUMS	22
USING THE MARKET DATA AS A TOOL.....	22



LIST OF TABLES

Table 1. Comparator Agencies.....	2
Table 2. Additional Comparator Agencies – Air Quality/Air Pollution	3
Table 3. Additional Comparator Agencies – Housing	4
Table 4. Cost of Labor Differentials	5
Table 5. Classifications 0% to 5% Below the Market Median	10
Table 6. Classifications 5% to 10% Below the Market Median	12
Table 7. Classifications 10% to 20% below the Market Median.....	14
Table 8. Classifications Greater than 20% below the Market Median.....	17
Table 9. Three-Year Implementation Proposal	20

LIST OF FIGURES

Figure 1: Distribution of Classifications Above and Below Market Median.....	9
Figure 2: Distribution of Classifications Below the Market Median	9

APPENDICES

- Appendix I: Results Summary
- Appendix II: Market Compensation Findings
- Appendix III: ERI Methodology for Cost of Labor



EXECUTIVE SUMMARY

Background

Between May-August 2021, Koff & Associates (“K&A”) conducted a Base Salary compensation study for the County of San Diego (“County”). All survey findings as requested are presented in this report.

The goal of the compensation study is to assist the County in developing a competitive pay plan, which is based upon market data, and to ensure that the plan is fiscally responsible and meets the needs of the County with regards to recruitment and retention of qualified staff.

Summary of Findings

This report summarizes the study methodology, analytical tools, and the base salary survey findings. The results of the compensation study showed:

- 467 classes were submitted to be studied; 459 SEIU classifications were surveyed since 8 classifications submitted were found to be terminated by the County and had no salary associated.
- The County’s *base salaries, overall, in comparison to the adjusted median* are 7.3% below the market.
- **323** classifications are below the median by an overall average of 13.1%.
- **136** classifications meet or exceed the median.
- **11** classifications had no comparator data. For these classifications and the 90 classifications that had insufficient data with fewer than four matches, we made internal alignment recommendations based on the market data framework.
- An additional breakdown of those below the market median reveals:
 - **77** classifications are between 0% to 5% below the median
 - **71** classifications are between 5% to 10% below the median
 - **104** classifications are between 10% to 20% below the median
 - **71** classifications are below market by more than 20% of the median
- K&A considers a classification falling within 5% of the median to be competitive.

STUDY PROCESS

Classifications Surveyed

The County worked with SEIU to determine the study elements related to survey classifications, comparator agencies, and data to be collected. The study initially included all 467 SEIU classifications. They fall into the following Bargaining Units:

- Appraisal, EDP, Fiscal, and Purchasing = AE



- Clerical = CL
- Food Services = FS
- Health Services = HS
- Mid Management = MM
- Professional = PR
- Public Services = PS
- Registered Nurses = RN
- Social Services Supervisors = SS
- Social Workers = SW

Subsequently it was found that 8 of the classes were terminated by the County and had no salaries associated with them. Consequently, data was collected on 459 classifications.

The classifications surveyed are listed alphabetically in Appendix I as part of the Market Results Summary.

Comparator Agencies

Another important step in conducting a market salary study is the determination of appropriate agencies for comparison. The County had provided a predetermined comparator group of 13 counties listed at Table 5. Additionally, Air Quality/Air Pollution Control Districts/Agencies (5 agencies) listed at Table 6 and Housing Agencies (4 agencies) at listed at Table 7 were identified as additional comparators for select Air Quality or Housing benchmarks also listed below.

Table 1. Comparator Agencies

13 Comparator Agencies
1. County of Alameda
2. County of Contra Costa
3. County of Fresno
4. County of Kern
5. County of Los Angeles
6. County of Orange
7. County of Riverside
8. County of Sacramento
9. County of San Bernardino
10. City & County of San Francisco
11. County of San Mateo



13 Comparator Agencies
12. County of Santa Clara
13. County of Ventura

Table 2. Additional Comparator Agencies – Air Quality/Air Pollution

5 Air Quality/Air Pollution Agencies
1. Air Pollution Control District San Luis Obispo County
2. Bay Area Air Quality Management District
3. Imperial County
4. Sacramento Metropolitan Air Quality Management District
5. South Coast Air Quality Management District

These air quality/air pollution agencies were used as additional comparators for the following classifications:

- Air Pollution Control Aide
- Air Pollution Control Civil Actions Investigator
- Air Pollution Control Small Business Assistant Program Specialist
- Air Pollution Test Technician (T)
- Air Quality Inspector I
- Air Quality Inspector II
- Air Quality Specialist
- Assistant Air Pollution Chemist
- Assistant Air Resources Specialist
- Assistant APC Engineer
- Assistant Meteorologist
- Associate Air Pollution Chemist
- Associate Air Pollution Control Engineer
- Associate Air Resources Specialist
- Associate Meteorologist
- Electronic Instrument Technician I
- Electronic Instrument Technician II
- Junior Air Pollution Chemist
- Junior Air Pollution Control Engineer
- Senior Air Pollution Chemist
- Senior Air Pollution Control Engineer
- Senior Meteorologist
- Supervising Air Quality Inspector



- Supervising Air Resources Specialist
- Supervising Electronic Instrument Technician

Table 3. Additional Comparator Agencies – Housing

9 Housing Authority Agencies
1. Housing Authority of the County of Contra Costa
2. Fresno Housing Authority
3. Housing Authority of the County of Kern
4. LA County Development Authority
5. Sacramento Housing & Redevelopment Agency
6. Housing Authority of the County of San Bernardino
7. San Francisco Housing Authority
8. Housing Authority Santa Clara County
9. Area Housing Authority of the County of Ventura

These housing agencies were used as additional comparators for the following classifications:

- Housing Aide
- Housing Program Analyst I
- Housing Program Analyst II
- Housing Program Analyst III
- Housing Program Analyst IV
- Housing Specialist I
- Housing Specialist II
- Housing Specialist III

Salary Data

The minimum and top step of the salary range was collected for each benchmark classification. All figures are represented on an annual basis.

Cost of Labor Differential

Use of a broader geographic survey group, as was done in this study, generally raises questions on the impact of regional differences in wages. Cost of Labor measures regional differences in wage trends and is an effective measure in drawing a comparison between salaries. To accomplish this, we used databases from the Economic Research Institute (ERI), a nationally recognized provider of data with respect to differences in the costs of living and cost of labor in counties with a population of over 10,000. The Cost of Labor percentages reflect regional



differences in wages and are relevant to making compensation decisions because the focus is on what other employers are paying within the region rather than the differences in the cost of consumer goods. Cost of Living focuses on the difference in the cost of consumer goods including housing and therefore can fluctuate more dramatically between locations. Information regarding ERI's methodology can be found in Appendix III.

Cost of Labor differentials were applied to the top step salary of each of the comparator agencies to ensure that wages reflect the regional pay levels of San Diego County. For example, counties located in the San Francisco Bay Area experience the highest Cost of Labor and accordingly, in order to reflect the Cost of Labor for the San Diego region, the top step salary of a match in Alameda County would have to be adjusted downward by 11.4% to represent the regional pay of San Diego. Alternatively, there were some comparators that had a lower Cost of Labor than San Diego County such as Kern County. The salaries of Kern County matches would have to be adjusted upward by 1.2% to reflect the regional pay levels of San Diego County.

K&A lists the Cost of Labor differentials to be utilized by the County to provide more accurate wage comparisons. The cost of labor percentages are as follows:

Table 4. Cost of Labor Differentials

Agency	Location of County Seat/Main Office	Salary Differentials to Apply
City and County of San Francisco	San Francisco, CA	-17.4%
County of Alameda	Oakland, CA	-11.4%
County of Contra Costa	Martinez, CA	-11.1%
County of Fresno	Fresno, CA	4.7%
County of Kern	Bakersfield, CA	1.2%
County of Los Angeles	Los Angeles, CA	-3.8%
County of Orange	Santa Ana, CA	-2.0%
County of Riverside	Riverside, CA	1.9%
County of Sacramento	Sacramento, CA	0.1%
County of San Bernardino	San Bernardino, CA	1.9%
County of San Mateo	Redwood City, CA	-17.5%
County of Santa Clara	San Jose, CA	-16.8%
County of Ventura	Ventura, CA	-0.7%
Air Quality Agencies		
Bay Area Air Quality Management District	San Francisco, CA	-17.4%
Imperial County Air Pollution Control District	El Centro, CA	5.6%
Sacramento Metropolitan Air Quality Management District	Sacramento, CA	0.1%
San Luis Obispo County Air Pollution Control District	San Luis Obispo, CA	2.9%
South Coast Air Quality Management District	Diamond Bar, CA	-2.8%



Agency	Location of County Seat/Main Office	Salary Differentials to Apply
Housing Authorities		
Area Housing Authority of the County of Ventura	Newbury Park, CA	-1.1%
Fresno Housing Authority	Fresno, CA	4.7%
Housing Authority Contra Costa County	Martinez, CA	-11.1%
Housing Authority County of Kern	Bakersfield, CA	1.2%
Housing Authority County of San Bernardino	San Bernardino, CA	1.9%
Housing Authority County of Santa Clara	San Jose, CA	-16.8%
Los Angeles County Development Authority	Alhambra, CA	-2.7%
Sacramento Housing and Redevelopment Agency	Sacramento, CA	0.1%
San Francisco Housing Authority	San Francisco, CA	-17.4%

Data Collection

Data was collected during the months of May through August 2021, through comparator agency websites, conversations with human resources, accounting, and/or finance personnel, and careful review of agency documentation such as classification descriptions, memoranda of understanding, organization charts, and other documents. Regular check in meetings occurred with the County's Human Resources team and SEIU representation.

Matching Methodology

K&A believes that the data collection step is the most critical for maintaining the overall credibility of any study and relied on the County's classification descriptions as the foundation for comparison.

When K&A researches and collects data from the comparator agencies to identify possible matches for each of the benchmark classifications, there is an assumption that comparable matches may not be made that are 100% equivalent to the classifications at the County. Therefore, K&A does not match based upon job titles, which can often be misleading, but rather analyze class descriptions before a comparable match is determined.

K&A's methodology is to analyze each class description and the whole position by evaluating factors such as:

- Definition and typical job functions;
- Distinguishing characteristics;
- Level within a class series (i.e., entry, experienced, journey, specialist, lead, etc.);
- Reporting relationship structure (for example, manages through lower-level staff);
- Education and experience requirements;
- Knowledge, abilities, and skills required to perform the work;
- The scope and complexity of the work;



- Independence of action/responsibility;
- The authority delegated to make decisions and take action;
- The responsibility for the work of others, program administration, and for budget dollars;
- Problem solving/ingenuity;
- Contacts with others (both inside and outside of the organization);
- Consequences of action and decisions; and
- Working conditions.

In order for a match to be included, K&A requires that a classification's "likeness" be at approximately 70% of the matched classification.

When an appropriate match is not identified for one classification, K&A often uses "hybrids" which can be functional or represent a span in scope of responsibility. A functional hybrid means that the job of one classification at the County is performed by two or more classifications at a comparator agency. A "hybrid" representing a span in scope means that the comparator agency has one class that is "bigger" in scope and responsibility and one class that is "smaller," where the County's class falls in the middle.

If an appropriate match could not be found, then no match was reported as a non-comparable (N/C).

Data Spreadsheets

For each benchmark classification, there is one information page with the Minimum and the Top Annual Base Salary Data.

The medians (midpoint) of the comparator agencies are reported on the Top Annual salary data spreadsheets. The % above or below that the County is compared to the median is also reported. The median is the midpoint of all data with 50% of data points below and 50% of data points above.

K&A typically requires that there be a minimum of four (4) comparator agencies with matching classifications to the benchmark classification. The reason for requiring a minimum of four matches is so that no one classification has undue influence on the calculations. However, the County requested that the median be calculated on all classifications regardless of meeting the four match minimum. We have flagged those benchmarks with fewer than four matches as having insufficient data. Sufficient data was collected from the comparator agencies for 352 of the originally designated 467 benchmark classifications.

INTERNAL SALARY RELATIONSHIPS

For some classifications we were unable to find any comparable matches with the survey agencies. For those classifications, with insufficient data, building from the salary levels established for identified benchmark classes, internal salary relationships were developed and consistently applied in order to develop specific salary recommendations for all classifications.



While analyzing internal relationships, the same factors analyzed when comparing the County's classifications to the labor market are used when making internal salary alignment recommendations.

In addition, the following are standard human resources practices that are commonly applied when making salary recommendations based upon internal relationships:

- A salary within 5% of the market average or median is considered to be competitive in the labor market for salary survey purposes because of the differences in compensation policy and actual scope of the position and its requirements. However, the County can adopt a different standard.
- Certain internal percentages are often applied. Those that are the most common are:
 - The differential between a trainee and experienced (or journey) class in a series (I/II or Trainee/Experienced) is generally 10% to 15%.
 - A lead or advanced journey-level (III or Senior-level) class is generally placed 10% to 15% above the journey-level.
 - A full supervisory class is normally placed at least 10% to 25% above the highest level supervised, depending upon the breadth and scope of supervision.
- When a market or internal equity adjustment is granted to one class in a series, the other classes in the series are also adjusted accordingly to maintain internal equity.

Internal equity between certain levels of classifications is a fundamental factor to be considered when making salary decisions. When conducting a market compensation survey, results can often show that certain classifications that are aligned with each other are not the same in the outside labor market. However, as an organization, careful consideration should be given to these alignments because they represent internal value of classifications within job families, as well as across the organization.

For the classifications that had insufficient data, zero matches or fewer than four matches, internal alignments with other classifications will need to be considered, either within the same class series or with those classifications that have similar scope of work, level of responsibility, and "worth" to the County. Where it is difficult to ascertain internal relationships due to unique qualifications and responsibilities, reliance can be placed on past internal relationships. It is important for County management to carefully review these internal relationships and determine if they are still appropriate given the current market data.

It is also important to analyze market data and internal relationships within class series as well as across the organization, and make adjustments to salary range placements, as necessary, based on the needs of the organization.

The County may want to make internal equity adjustments or alignments, as it implements the compensation strategy. This market survey is only a tool to be used by the County to determine market indexing and salary determination.



MARKET COMPENSATION FINDINGS

Appendix I represents a summary of the market top annual (base) salary. For each benchmark classification, the number of matches (agencies with a comparable position) and percent above or below the top annual salary market median is listed. The Appendix is sorted alphabetically.

Base Salary

Base salary market results show that 361 classifications are paid below the market median, and 98 classifications are paid above the market median.

# of Classifications	Above Median	<5%	5-10%	10-20%	>20%	Total
Below the Market Median	136	77	71	104	71	459

Figure 1: Distribution of Classifications Above and Below Market Median

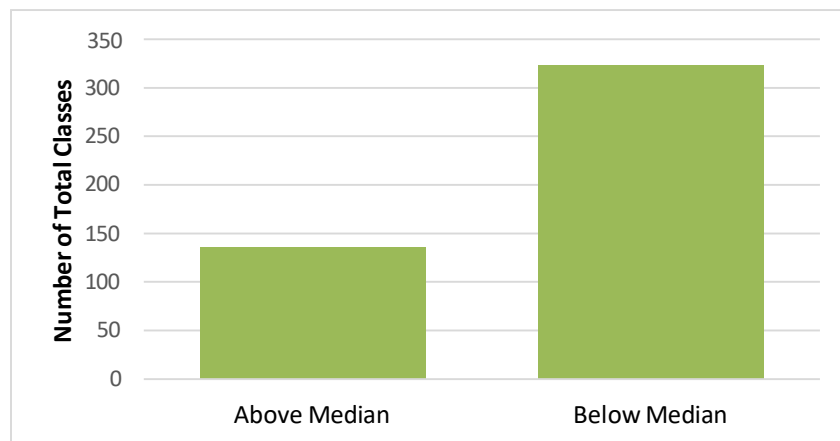
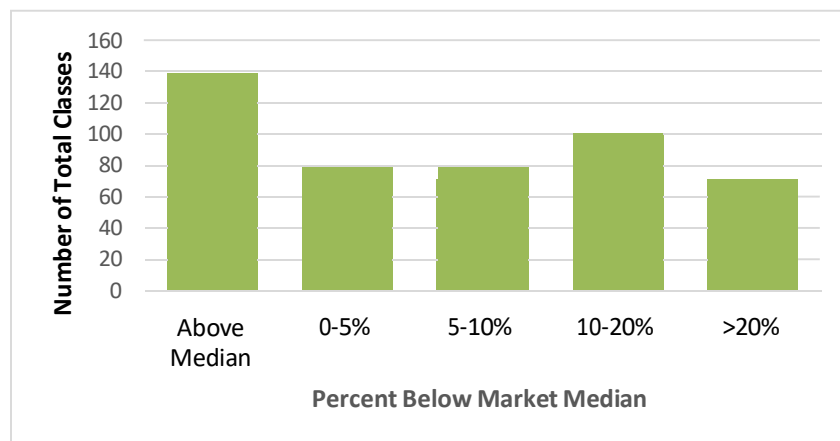


Figure 2: Distribution of Classifications Below the Market Median





Generally, a classification falling within 5% of the median is considered to be competitive in the labor market for salary survey purposes because of the differences in compensation policy, actual scope of work, and position requirements. However, the County can adopt a different standard.

Cost

The total cost to bring all incumbents to the annual median salary for the 13 counties is \$50,361,190. The total cost to bring all budgeted positions to the annual median salary is **\$54,826,506.** (Approximately 11,185 positions). This amount includes internal alignment recommendations for those classification with no market data or fewer than four matches.

Additional Information

The following tables display the classifications 0% to 5% below, 5% to 10% below, 10% to 20% below, and greater than 20% below the median, respectfully:

Table 5. Classifications 0% to 5% Below the Market Median

77 Classifications 0% to 5% Below Median	Bargaining Unit	# of Incumbents per Class	Cost per Actual Incumbents
Account Clerk Specialist	CL	63	\$90,399
Admissions Clerk	CL	12	\$10,152
Air Quality Specialist	PR	5	\$1,683
Alcohol & Drug Program Specialist	PR	10	\$18,140
Animal Care Attendant	PS	11	\$6,704
Appraiser II	AE	48	\$42,358
Assistant Health Physicist*	PR	0	\$0
Assistant Procurement Specialist	AE	4	\$9,241
Associate Accountant	AE	59	\$9,331
Associate Air Pollution Control Engineer	PR	6	\$14,506
Associate Meteorologist*	PR	3	\$5,261
Broadcast Engineer	PS	1	\$3,262
Cadastral Technician	AE	7	\$17,139
Community Health Program Specialist	PR	26	\$84,974
Community Health Promotion Specialist I	PR	6	\$10,453
Emergency Services Coordinator	MM	3	\$11,701
Engineering Technician I	PS	2	\$1,338
Engineering Technician III	PS	16	\$14,552
Environmental Health Specialist Trainee	PR	14	\$24,680
Estate Assistant*	PS	3	\$5,280
Estate Property Manager	MM	1	\$3,336
Fleet Standards Technician*	AE	4	\$8,407



Base Salary Compensation Study – Final Report

County of San Diego

77 Classifications 0% to 5% Below Median	Bargaining Unit	# of Incumbents per Class	Cost per Actual Incumbents
Fleet Support Specialist*	PR	1	\$1,467
Graphic Artist	PS	2	\$1,107
Human Services Specialist	SW	1656	\$1,232,020
Industrial Hygienist I*	PR	1	\$644
Industrial Hygienist II	PR	3	\$2,332
Jr Land Use/Environmental Planner	PR	7	\$18,469
Land Surveyor	PR	5	\$7,327
Land Use Aide*	PS	5	\$6,386
Land Use Technician I	PS	7	\$17,699
Land Use Technician III	PS	6	\$19,076
Land Use/Environmental Planner I	PR	12	\$17,826
Land Use/Environmental Planner III	PR	43	\$74,702
Library Associate*	PR	3	\$6,842
Mail Systems Supervisor	MM	1	\$95
Medical Consultant*	PR	3	\$11,404
Occupational/Physical Therapist	PR	32	\$105,485
Paralegal Supervisor*	MM	13	\$14,728
Patient Services Specialist III (T)	SW	1	\$394
Property Assessment Specialist I*	AE	15	\$17,344
Protective Services Worker	SW	557	\$294,884
Public Health Microbiologist	PR	5	\$18,012
Records Clerk*	CL	77	\$140,405
Recycling Specialist I*	PR	0	\$0
Residential Childcare Specialist*	HS	9	\$3,361
Section Chief, Revenue & Recovery	MM	5	\$21,647
Senior Admissions Clerk*	CL	1	\$1,697
Senior Airport Technician	MM	2	\$2,086
Senior Health Physicist*	MM	1	\$246
Senior HHSA Contract Auditor	MM	4	\$9,361
Senior Meteorologist*	PR	1	\$1,171
Senior Park Ranger	MM	17	\$53,013
Senior Public Health Microbiologist	PR	5	\$10,867
Senior Real Property Agent	PR	10	\$24,608
Senior Structural Engineer	MM	0	\$0
Senior Tax Payment Enforcement Officer	PS	1	\$1,387
Senior Tax Payment Processor*	CL	0	\$0
Senior Vector Control Technician	PS	8	\$17,099



Base Salary Compensation Study – Final Report

County of San Diego

77 Classifications 0% to 5% Below Median	Bargaining Unit	# of Incumbents per Class	Cost per Actual Incumbents
Sheriff's Detentions Nurse	RN	168	\$120,280
Sheriff's Licensing Clerk I*	CL	7	\$5,874
Sheriff's Licensing Clerk II*	CL	2	\$349
Sheriff's Licensing Specialist*	CL	2	\$3,267
Statistician	PR	0	\$0
Supervising Air Resources Specialist*	MM	2	\$6,070
Supervising Community Health Promotion Specialist	MM	1	\$2,760
Supervising Pest Management Technician	MM	1	\$1,387
Supervising Sheriff's Emergency Services Dispatcher	MM	15	\$7,719
Supervising Vector Ecologist*	MM	1	\$992
Tax Payment Enforcement Officer	PS	1	\$2,152
Tax Payment Processor	CL	0	\$0
Telecommunications Technician III	MM	8	\$9,083
Telecommunications Technician IV	MM	3	\$10,283
Toxicologist II	PR	4	\$10,320
Toxicologist III*	MM	1	\$3,908
Vector Ecologist*	PR	2	\$4,716
Watershed Manager*	MM	0	\$0
Total		3,041	\$2,737,251

*Insufficient data. Used internal alignment to make a salary recommendation.

Table 6. Classifications 5% to 10% Below the Market Median

71 Classifications 5% to 10% Below Median	Bargaining Unit	# of Incumbents per Class	Cost per Actual Incumbents
Account Clerk	CL	37	\$148,033
Adult Protective Services Specialist	PS	62	\$452,727
Adult Protective Services Supervisor	MM	14	\$99,442
Air Pollution Test Technician (T)*	PS	1	\$6,293
Animal Control Officer	PS	9	\$27,176
Appraiser Trainee	AE	0	\$0
Assistant Airport Manager	MM	2	\$11,245
Assistant APC Engineer	PR	11	\$77,342
Assistant Meteorologist*	PR	0	\$0
Assistant Weapons Coordinator*	PS	2	\$9,178
Civil Engineer	PR	32	\$276,843



Base Salary Compensation Study – Final Report

County of San Diego

71 Classifications 5% to 10% Below Median	Bargaining Unit	# of Incumbents per Class	Cost per Actual Incumbents
Code Enforcement Officer	PS	10	\$68,326
Community Health Promotion Assistant	PR	0	\$0
Community Health Promotion Specialist II	PR	18	\$110,672
Deputy Public Admin-Guardian	PS	15	\$78,562
Environmental Health Specialist II	PR	61	\$336,253
Environmental Health Specialist III	PR	32	\$196,227
Fleet Parts Specialist	AE	3	\$11,667
Food Services Supervisor	MM	14	\$57,253
Housing Program Analyst III	PR	2	\$10,577
Industrial Hygienist III*	PR	0	\$0
Insect Detection Specialist I	PS	0	\$0
Investigative Specialist	PS	11	\$41,903
Jr Surveyor (T)	PR	3	\$12,509
Legal Support Supervisor I	MM	33	\$113,197
Legal Support Supervisor II	MM	24	\$101,212
Librarian III	PR	17	\$84,607
Library Technician IV*	PS	14	\$51,563
Mail Carrier	PS	15	\$51,967
Medical Transcriber	CL	1	\$4,013
Mental Health Case Management Clinician	PR	25	\$168,660
Mental Health Specialist	HS	6	\$27,166
Office Assistant	CL	788	\$2,515,896
Office Support Specialist	CL	97	\$386,599
Paralegal I	PS	21	\$112,720
Park Ranger	PS	49	\$214,900
Parks Recreational Supervisor	MM	8	\$29,239
Pharmacist	MM	10	\$85,531
Probation Aide	PS	19	\$84,406
Protective Services Assistant	SW	1	\$2,869
Protective Services Supervisor	SS	129	\$999,326
Psychiatric Nurse	RN	104	\$881,067
Purchasing Clerk	AE	3	\$15,050
Recreational Therapist	PR	7	\$43,175
Residential Care Worker Supervisor*	MM	20	\$104,397
Road Crew Supervisor	MM	18	\$127,493
Senior Civil Engineer	MM	29	\$238,985
Senior Clinical Psychologist	PR	14	\$77,708



Base Salary Compensation Study – Final Report

County of San Diego

71 Classifications 5% to 10% Below Median	Bargaining Unit	# of Incumbents per Class	Cost per Actual Incumbents
Senior Construction Inspector	MM	1	\$6,701
Senior Electronic Security & Systems Technician	MM	1	\$8,018
Senior Laboratory Assistant	HS	3	\$13,713
Senior Mail Carrier*	PS	1	\$3,567
Senior Medical Transcriber*	CL	1	\$4,442
Senior Occupational/Physical Therapist	PR	19	\$134,792
Senior Revenue & Recovery Officer	PS	9	\$37,625
Senior Storekeeper	MM	9	\$46,767
Senior Vector Ecologist*	PR	1	\$7,339
Sheriff's Detentions, Chief Mental Health Clinician*	MM	2	\$15,430
Sheriff's Operations Supervisor*	MM	6	\$38,623
Supervising Animal Care Attendant	MM	4	\$13,468
Supervising Child Support Officer	MM	17	\$75,229
Supervising Deputy Public Administrator-Guardian	MM	2	\$14,362
Supervising Environmental Health Specialist	MM	22	\$128,017
Supervising Industrial Hygienist	MM	1	\$9,793
Supervising Occupational/Physical Therapist	MM	11	\$102,825
Supervising, Vector Control Technician*	MM	5	\$27,076
Toxicologist I*	PR	0	\$0
Vector Control Technician	PS	16	\$82,793
Veterinarian	PR	1	\$12,201
Wastewater Facilities Supervisor	MM	1	\$8,242
Wastewater Plant Operator III	MM	4	\$26,040
Total		1,928	\$9,371,040

*Insufficient data. Used internal alignment to make a salary recommendation.

Table 7. Classifications 10% to 20% below the Market Median

104 Classifications 10% to 20% Below Median	Bargaining Unit	# of Incumbents per Class	Cost per Actual Incumbents
Accounting Technician	AE	82	\$665,837
Administrative Secretary II	CL	91	\$723,907
Aging Program Specialist II	PS	42	\$571,194
Animal Medical Operations Manager*	MM	1	\$18,766
Animal Services Dispatcher*	CL	5	\$27,715
Animal Services Representative	CL	6	\$30,290



Base Salary Compensation Study – Final Report

County of San Diego

104 Classifications 10% to 20% Below Median	Bargaining Unit	# of Incumbents per Class	Cost per Actual Incumbents
Assessment Clerk	CL	29	\$130,132
Assistant Child Support Officer	PS	8	\$72,831
Assistant Real Property Agent	PR	0	\$0
Assistant Surveyor	PR	3	\$30,731
Associate Air Pollution Chemist*	PR	15	\$286,849
Associate Air Resources Specialist	PR	4	\$56,391
Associate Real Property Agent	PR	3	\$25,953
Building Maintenance Supervisor	MM	14	\$178,745
Building/Enforcement Supervisor	MM	3	\$31,697
Cashier	CL	10	\$52,740
Certified Nurse Practitioner	RN	4	\$82,345
Community Services Officer	PS	50	\$470,375
Cook	FS	15	\$116,786
Crime Prevention Specialist	PS	19	\$118,126
Departmental Clerk	CL	0	\$0
Detentions Processing Supervisor*	MM	28	\$226,300
Detentions Processing Technician	CL	147	\$1,128,252
Drafting Technician	PS	0	\$0
Electronic Instrument Technician I	PS	2	\$15,611
Electronic Instrument Technician II	PS	7	\$57,887
Food Services Worker	FS	50	\$253,556
Health Information Management Clerk*	CL	6	\$42,491
Health Information Management Technician	HS	33	\$275,605
Health Services Social Worker	SW	3	\$30,420
Histology Technician	HS	0	\$0
Historian	PR	0	\$0
Housing Aide	PS	6	\$53,539
Housing Program Analyst IV	PR	3	\$34,496
Housing Specialist III	PS	7	\$59,187
Jr Air Pollution Chemist*	PR	0	\$0
Jr Air Pollution Control Engineer*	PR	1	\$9,488
Jr Public Health Microbiologist	PR	3	\$25,266
Laboratory Assistant	HS	6	\$31,055
Legal Support Assistant II	CL	148	\$1,350,019
Library Technician I	PS	69	\$523,765
Library Technician II	PS	46	\$277,468
Library Technician III	PS	37	\$239,502



Base Salary Compensation Study – Final Report

County of San Diego

104 Classifications 10% to 20% Below Median	Bargaining Unit	# of Incumbents per Class	Cost per Actual Incumbents
Licensed Vocational Nurse	HS	38	\$235,523
Litigation Investigator	PS	0	\$0
Mail Processor	PS	0	\$0
Medical Examiner Invest II	PS	11	\$168,804
Mental Health Aide*	HS	15	\$119,552
Mental Health Case Management Assistant	HS	7	\$58,481
Nutritionist	PR	4	\$36,083
Occupational/Physical Therapist Assistant	HS	1	\$10,980
Patient Services Specialist IV (T)	SS	1	\$10,689
Pharmacy Stock Clerk	AE	0	\$0
Principal Treasurer-Tax Collector Specialist	MM	2	\$22,732
Process Server	PS	1	\$6,139
Process Server Supervisor*	MM	1	\$9,979
Psychiatric Technician	HS	0	\$0
Public Assistance Investigator I*	PS	8	\$61,536
Public Assistance Investigator II	PS	19	\$209,196
Public Assistance Investigator Supervisor	MM	8	\$95,879
Public Assistance Investigator Trainee*	PS	3	\$22,953
Public Defender Investigator I	PS	16	\$217,693
Public Defender Investigator II	PS	34	\$538,603
Public Health Nurse	RN	110	\$1,092,584
Public Health Nurse Supervisor	MM	33	\$553,994
Public Health Nutrition Manager	MM	1	\$11,598
Quality Assurance Specialist (Registered Nurse)	PR	14	\$217,164
Recreation Therapy Supervisor	MM	2	\$18,980
Registered Veterinary Technician	PS	5	\$47,378
Revenue & Recovery Officer Trainee	PS	1	\$4,869
Senior Account Clerk	MM	4	\$36,409
Senior Adult Protective Services Specialist	PS	10	\$94,830
Senior Air Pollution Chemist*	MM	3	\$61,420
Senior Animal Services Representative*	CL	2	\$11,686
Senior Cashier*	MM	0	\$0
Senior Cook	FS	58	\$440,167
Senior Forensic Evidence Technician	PS	1	\$9,018
Senior Histology Technician*	HS	0	\$0
Senior Litigation Investigator*	PS	4	\$55,036
Senior Office Assistant	MM	118	\$866,557



Base Salary Compensation Study – Final Report

County of San Diego

104 Classifications 10% to 20% Below Median	Bargaining Unit	# of Incumbents per Class	Cost per Actual Incumbents
Senior Precinct Planning Technician*	PS	2	\$18,364
Senior Protective Services Worker	SW	145	\$1,381,054
Senior Public Health Nurse	RN	52	\$648,983
Senior Treasurer-Tax Collector Specialist	CL	27	\$211,490
Sewing Room Supervisor*	MM	1	\$7,037
Sheriff's Commissary Stores Supervisor*	MM	1	\$8,597
Sheriff's Communications Dispatcher	PS	3	\$17,488
Sheriff's Emergency Services Dispatcher	PS	92	\$797,933
Sheriff's Property & Evidence Manager*	MM	1	\$13,205
Sheriff's Property Investigator*	PS	3	\$29,512
Sheriff's Records & Identification Clerk I	CL	1	\$6,680
Sheriff's Records & Identification Clerk II	CL	55	\$423,856
Social Work Supervisor	SS	25	\$281,845
Social Worker I	SW	33	\$314,584
Staff Nurse	RN	47	\$672,740
Stock Clerk	AE	47	\$362,508
Storekeeper II (T)	MM	1	\$6,561
Supervising Animal Control Officer	MM	4	\$33,244
Supervising Electronic Instrument Technician	MM	2	\$33,002
Supervising Nurse	MM	20	\$310,670
Supervising Park Ranger	MM	19	\$202,578
Technical Writer	PR	1	\$14,157
Treasurer-Tax Collector Specialist	CL	30	\$222,981
Victim/Witness Assist Program Manager	MM	1	\$17,353
Total		2,154	\$19,708,253

*Insufficient data. Used internal alignment to make a salary recommendation.

Table 8. Classifications Greater than 20% below the Market Median

71 Classifications >20% Below Median	Bargaining Unit	# of Incumbents per Class	Cost per Actual Incumbents
Administrative Secretary I	CL	40	\$464,004
Aging Program Specialist I*	PS	1	\$13,533
Aging Program Specialist III*	MM	7	\$113,723
Air Pollution Control Aide*	PS	14	\$275,140
Assistant Air Pollution Chemist*	PR	0	\$0



Base Salary Compensation Study – Final Report

County of San Diego

71 Classifications >20% Below Median	Bargaining Unit	# of Incumbents per Class	Cost per Actual Incumbents
Assistant Air Resources Specialist	PR	0	\$0
Assistant Division Chief, Assessor/Recorder/County Clerk	MM	8	\$331,802
Chaplain-Coordinator	PR	0	\$0
Clinical Psychologist	PR	3	\$59,593
Departmental Payroll Technician	CL	1	\$13,123
Deputy Medical Examiner I*	PR	0	\$0
Deputy Medical Examiner II	PR	5	\$240,183
Deputy Sheriff Cadet-Detentions/Court Services	PS	45	\$1,026,573
Deputy Sheriff's Cadet	PS	58	\$841,616
Detentions Information Assistant	CL	53	\$503,579
Dietitian	PR	1	\$17,717
Disease Research Scientist	PR	1	\$22,982
Environmental Health Technician	PS	18	\$249,846
Geographic Information Systems Analyst	PR	6	\$130,062
Geographic Information Systems Technician	PS	4	\$48,738
Human Services Control Specialist	SW	29	\$512,106
Insect Detection Specialist II	PS	31	\$376,216
Inservice Education Coordinator*	RN	3	\$87,603
Jr Real Property Agent	PR	0	\$0
Landscape Architect	PR	1	\$24,012
Legal Support Assistant I	CL	55	\$614,889
Legal Support Assistant III	CL	52	\$572,842
Library Technician Substitute*	PS	0	\$0
Medical Claims Specialist	CL	14	\$146,898
Medical Examiner Invest I	PS	3	\$52,133
Medical Examiner Invest III	MM	3	\$68,205
Payroll Clerk	CL	2	\$29,357
Pediatrician	PR	0	\$0
Pharmacy Storekeeper*	MM	0	\$0
Physician Assistant	PR	0	\$0
Precinct Planning Technician*	PS	1	\$10,664
Psychiatric Clinical Nurse Specialist	RN	0	\$0
Psychiatric Resident*	PR	0	\$0
Psychiatrist	PR	2	\$88,440
Psychiatrist - Specialist	PR	5	\$352,130
Public Defender Investigator III	PS	12	\$308,251
Radiologic Technologist	HS	2	\$58,184



Base Salary Compensation Study – Final Report

County of San Diego

71 Classifications >20% Below Median	Bargaining Unit	# of Incumbents per Class	Cost per Actual Incumbents
Radiologist*	PR	1	\$58,615
Records Management Coordinator	MM	3	\$52,884
Recreation Therapy Aide*	HS	6	\$90,957
Senior Assessment Clerk	CL	5	\$70,212
Senior Geographic Information Systems Analyst	PR	10	\$198,725
Senior Health Information Management Technician*	HS	8	\$89,124
Senior Insect Detection Specialist*	PS	6	\$74,925
Senior Payroll Clerk*	CL	0	\$0
Sheriff's Emergency Services Dispatcher Trainee	PS	27	\$624,859
Sheriff's Fingerprint Examiner	PS	8	\$175,665
Sheriff's Licensing Supervisor*	MM	3	\$40,087
Sheriff's Property & Evidence Custodian*	PS	2	\$27,414
Sheriff's Property & Evidence Specialist I	CL	9	\$144,708
Sheriff's Property & Evidence Specialist II	CL	0	\$0
Sheriff's Range Guard*	PS	3	\$65,817
Sheriff's Records & Identification Supervisor	MM	10	\$118,622
Sheriff's Senior Fingerprint Examiner	PS	1	\$25,830
Social Services Aide	SW	20	\$170,385
Social Worker II	SW	14	\$204,391
Social Worker III	SW	202	\$3,734,007
Storekeeper	AE	16	\$165,405
Supervising Assessment Clerk	MM	4	\$62,382
Supervising Human Services Control Specialist	SS	6	\$109,837
Supervising Human Services Specialist	SS	220	\$3,413,259
Supervising Office Assistant	MM	43	\$592,333
Supervising Treasurer-Tax Collector Specialist	MM	6	\$91,198
Utilization Review Quality Improvement Specialist	PR	20	\$403,921
Utilization Review Quality Improvement Supervisor	MM	4	\$84,940
Vector Control Technician Aide	PS	0	\$0
Total		1,137	\$18,544,646

*Insufficient data. Used internal alignment to make a salary recommendation.



RECOMMENDATIONS

Pay Philosophy

The County has many options regarding what type of compensation plan it wants to implement. This decision will be based on fiscal considerations, what the County's pay philosophy is, at which level it desires to pay its employees compared to the market, whether it is going to consider additional alternative compensation programs, and how great the competition is with other agencies over recruitment of a highly qualified workforce. The initial recommendations have been made utilizing a philosophy of market median adjusted for Cost of Labor differentials.

Options for Implementation

While the County may be interested in bringing all salaries to the market median, in most cases this goal may not be reached with a single adjustment. In this case, one option is to move employees into the salary range that is recommended for each class based on this market study and to the step within the new range that is closest to their current compensation. If employees' current salaries are significantly below market so that their current compensation falls below the bottom of the newly recommended range, then larger adjustments would be needed to move those employees at least to the bottom of the new salary range.

Another option is to use a phased implementation approach. Normally, if the compensation implementation program must be carried over months or years, the classes that are farthest from the market median should receive the greatest equity increase (separate from any cost of living increase). If a class falls within 5% of the market median, it would be logical to make no equity adjustment in the first round of changes. However, if a class is more than 5% (or in this case, more than 20%) below the market median, a higher percentage change may be initially warranted to reduce the disparity.

For example, if the County decided to implement the recommendations over a three-year period, then the following guidelines could be applied for the initial increase of the three-year implementation plan:

Table 9. Three-Year Implementation Proposal

Market Disparity	% Increase
0 to 4.99%	0 to 2.49%
5.0% to 9.99%	2.5% to 4.99%
10.0% to 14.99%	5.0% to 7.49%
15.0% to 19.99%	7.5% to 9.99%
20.0% and above	10.0%



The initial first year adjustment would provide a portion of the equity increase and place the class into the closest step (but not below) where they are now. Subsequent increases would be spaced on a similar schedule (at annual intervals) based upon the remaining disparity after each adjustment.

Please note that typically, for those classes that had a market disparity of 0 to 4.99%, we recommend a 0% increase in the first year and an adjustment in the second year. Depending upon the County's financial situation, which will have to be reviewed before each further adjustment is made, all market disparity adjustments are intended to be completed by the third year. The County may also consider a similar implementation plan over a longer period of time, like a five-year implementation plan.

The County may spend additional time to go through a process of deliberation and decision-making as to what compensation philosophy it should implement to attract, motivate, and retain a high-quality workforce. However, the County may want to consider adjusting those classifications' salaries that are currently below the market median as soon as possible, assuming that incumbents' performance meets the County's level of expectation.

When classifications are over market, K&A typically recommends Y-rating employees whose current pay exceeds the maximum of the recommended range until the market numbers "catch up" with their current salary. To Y-rate an employee means to keep the employee's salary frozen and to provide no salary increases (including no cost of living adjustments) until the employee's current salary is within the recommended salary range. This will result in no immediate loss of income but will delay any future increases until the incumbent's salary is within the salary range.

Other options to "freezing" a classification's salary in place until the market catches up are:

- **"Grandfathering" of salary ranges:** This means that the salary range for the classification is adjusted down to what the market numbers are. However, current incumbents would continue being paid at the current rate of pay (which would put them outside of the new and adjusted salary range for the class) until they separate from employment with the County. Any new hires would be paid within the newly established salary range.
- **Single-incumbent classes:** If a class only has one incumbent, an option would be to wait until the person separates from employment with the County and then adjust the salary range for the class according to the market.
- **Recent hires:** Some employees who have recently been hired may still be at one of the lower steps within their current salary range. So, even if the top of their current salary range is above market, the incumbents are currently still paid below the market maximum because they are not at the top of their current salary range. In this case, an immediate salary range adjustment could be made to bring the salary range within the market. This would bring the affected incumbents either to the top of the market range or very close to it, but they would not technically be Y-rated or lose any pay.



Another option, of course, is to actually reduce salaries down to the market. However, from an employee relations perspective this may not be a viable option.

PAY PREMIUMS

Another consideration when making salary decisions is to evaluate pay premiums, or differentials, that have historically been paid to attract talent for difficult to recruit for classifications. Often these differentials are necessary when the supply of workers is low or compensation is not competitive to attract those capable of performing the work. The County should evaluate those classifications where these premiums have historically been applied, and determine whether they are necessary once equity adjustments have been made setting compensation at a competitive level.

USING THE MARKET DATA AS A TOOL

K&A would like to reiterate that this report and the findings are meant to be a tool for the County to create and implement an equitable compensation plan. Compensation strategies are designed to attract and retain excellent staff; however, financial realities and the County's expectations may also come into play when determining appropriate compensation philosophies and strategies. The collected data presented herein represents a market survey that will give the County an instrument to make future compensation decisions.

It has been a pleasure working with County on this critical project. Please do not hesitate to contact us if we can provide any additional information or clarification regarding this report.

Respectfully submitted by,

Koff & Associates

A handwritten signature in blue ink, appearing to read 'Katie Kaneko'.

Katie Kaneko
Managing Director



Appendix I

Results Summary

County of San Diego
Appendix I: Results Summary
August 2021

	Bargaining	Top Annual Salary			Adjusted Top Annual Salary			Cost Difference	# of Budgeted	Cost per	# of	Cost per Actual	# of	
	PR	\$ 114,317	\$ 85,904		\$ 85,493	\$ 85,493		\$ -28,824	1	\$0	1	\$0	2	Above Market N/A
Account Clerk	CL	\$ 43,243	\$ 48,758	-12.8%	\$ 47,244	\$ 47,244	-9.3%	\$ 4,001	37	\$148,033	37	\$148,033	13	
Account Clerk Specialist	CL	\$ 49,816	\$ 50,746	-1.9%	\$ 51,251	\$ 51,251	-2.9%	\$ 1,435	85	\$121,967	63	\$90,399	10	
Accounting Technician	AE	\$ 53,144	\$ 65,020	-22.3%	\$ 61,264	\$ 61,264	-15.3%	\$ 8,120	87	\$706,437	82	\$665,837	13	
Administrative Secretary I	CL	\$ 44,616	\$ 59,248	-32.8%	\$ 56,216	\$ 56,216	-26.0%	\$ 11,600	50	\$580,005	40	\$464,004	8	
Administrative Secretary II	CL	\$ 51,542	\$ 67,039	-30.1%	\$ 59,497	\$ 59,497	-15.4%	\$ 7,955	105	\$835,277	91	\$723,907	10	
Admissions Clerk	CL	\$ 44,179	\$ 44,687	-1.1%	\$ 45,025	\$ 45,025	-1.9%	\$ 846	14	\$11,844	12	\$10,152	5	
Adult Protective Services Specialist	PS	\$ 75,317	\$ 85,613	-13.7%	\$ 82,619	\$ 82,619	-9.7%	\$ 7,302	74	\$540,352	62	\$452,727	9	
Adult Protective Services Supervisor	MM	\$ 92,602	\$ 105,184	-13.6%	\$ 99,705	\$ 99,705	-7.7%	\$ 7,103	16	\$113,648	14	\$99,442	8	
Aging Program Specialist I	PS	\$ 57,450	\$ 80,313	-39.8%	\$ 72,891		-23.6%	\$ 13,533	0	\$0	1	\$13,533	2	Internal Alignment: 15% below the Aging Program Specialist II
Aging Program Specialist II	PS	\$ 69,909	\$ 95,484	-36.6%	\$ 83,509	\$ 83,509	-19.5%	\$ 13,600	42	\$571,194	42	\$571,194	4	
Aging Program Specialist III	MM	\$ 79,789	\$ 93,032	-16.6%	\$ 86,601	\$ 96,035	-20.4%	\$ 16,246	8	\$129,969	7	\$113,723	2	Internal Alignment: 15% above Aging Program Specialist II
Agricultural Civil Actions Investigator	PR	\$ 100,610				\$ 99,327	1.3%	\$ -1,283	0	\$0	0	\$0	0	Internal Alignment: 10% below Litigation Investigator
Agricultural Scientist	MM	\$ 109,907	\$ 94,426	14.1%	\$ 85,373	\$ 85,373	22.3%	\$ -24,535	4	\$0	3	\$0	2	Above Market N/A
Agricultural Standards Inspector	PR	\$ 74,693	\$ 76,040	-1.8%	\$ 67,599	\$ 67,599	9.5%	\$ -7,093	3	\$0	30	\$0	13	
Air Pollution Control Aide*	PS	\$ 55,203	\$ 59,004	-6.9%	\$ 56,911	\$ 74,856	-35.6%	\$ 19,653	15	\$294,793	14	\$275,140	3	Internal Alignment: 15% below Jr. Air Pollution Chemist
Air Pollution Control Civil Actions Investigator*	PS	\$ 100,797	\$ 105,790	-5.0%	\$ 94,861	\$ 99,327	1.5%	\$ -1,470	4	\$0	4	\$0	2	Internal Alignment: 10% below Litigation Investigator
Air Pollution Control Small Business Assistant Program Specialist*	PR	\$ 98,197				\$ 97,340	0.9%	\$ -857	1	\$0	1	\$0	0	Internal Alignment: Anchor to Environmental Health Specialist III
Air Pollution Test Technician (T)*	PS	\$ 72,966	\$ 75,693	-3.7%	\$ 67,629	\$ 79,259	-8.6%	\$ 6,293	1	\$6,293	1	\$6,293	2	Internal Alignment: 10% below Jr. Air Pollution Chemist
Air Quality Inspector I*	PS	\$ 77,397	\$ 76,802	0.8%	\$ 75,149	\$ 75,149	2.9%	\$ -2,247	0	\$0	11	\$0	6	
Air Quality Inspector II*	PS	\$ 89,731	\$ 90,115	-0.4%	\$ 85,565	\$ 85,565	4.6%	\$ -4,167	26	\$0	15	\$0	6	
Air Quality Specialist*	PR	\$ 99,050	\$ 108,780	-9.8%	\$ 99,386	\$ 99,386	-0.3%	\$ 337	6	\$2,020	5	\$1,683	5	
Alcohol & Drug Program Specialist	PR	\$ 81,890	\$ 92,922	-13.5%	\$ 83,704	\$ 83,704	-2.2%	\$ 1,814	13	\$23,582	10	\$18,140	6	
Animal Care Attendant	PS	\$ 48,318	\$ 53,554	-10.8%	\$ 48,928	\$ 48,928	-1.3%	\$ 609	11	\$6,704	11	\$6,704	10	
Animal Control Officer	PS	\$ 59,925	\$ 66,264	-10.6%	\$ 62,944	\$ 62,944	-5.0%	\$ 3,020	12	\$36,235	9	\$27,176	11	
Animal Medical Operations Manager	MM	\$ 101,587	\$ 120,034	-18.2%	\$ 106,710	\$ 120,353	-18.5%	\$ 18,766	1	\$18,766	1	\$18,766	1	Internal Alignment: 80% above Registered Veterinary Technician
Animal Services Dispatcher	CL	\$ 47,715	\$ 50,082	-5.0%	\$ 51,034	\$ 53,258	-11.6%	\$ 5,543	5	\$27,715	5	\$27,715	3	Internal Alignment: 5% below Sheriff's Communications Dispatcher
Animal Services Representative	CL	\$ 46,010	\$ 55,304	-20.2%	\$ 51,058	\$ 51,058	-11.0%	\$ 5,048	7	\$35,338	6	\$30,290	6	
Appraiser I	AE	\$ 70,450	\$ 76,500	-8.6%	\$ 70,213	\$ 70,213	0.3%	\$ -237	0	\$0	5	\$0	10	
Appraiser II	AE	\$ 80,454	\$ 87,174	-8.4%	\$ 81,337	\$ 81,337	-1.1%	\$ 882	54	\$47,653	48	\$42,358	13	
Appraiser III	AE	\$ 90,792	\$ 97,533	-7.4%	\$ 89,181	\$ 89,181	1.8%	\$ -1,611	29	\$0	27	\$0	10	
Appraiser IV	AE	\$ 99,882	\$ 99,492	0.4%	\$ 93,885	\$ 93,885	6.0%	\$ -5,997	9	\$0	8	\$0	8	
Appraiser Trainee	AE	\$ 57,949	\$ 67,338	-16.2%	\$ 63,428	\$ 63,428	-9.5%	\$ 5,479	0	\$0	0	\$0	8	
Assessment Clerk	CL	\$ 44,054	\$ 48,573	-10.3%	\$ 48,542	\$ 48,542	-10.2%	\$ 4,487	29	\$130,132	29	\$130,132	8	
Assistant Air Pollution Chemist*	PR	\$ 84,053	\$ 93,461	-11.2%	\$ 83,439	\$ 101,276	-20.5%	\$ 17,223	0	\$0	0	\$0	2	Internal Alignment: 15% above Jr. Air Pollution Chemist
Assistant Air Resources Specialist*	PR	\$ 78,042	\$ 102,427	-31.2%	\$ 94,978	\$ 94,978	-21.7%	\$ 16,936	0	\$0	0	\$0	4	
Assistant Airport Manager	MM	\$ 86,736	\$ 103,890	-19.8%	\$ 92,359	\$ 92,359	-6.5%	\$ 5,623	2	\$11,245	2	\$11,245	9	
Assistant APC Engineer*	PR	\$ 88,421	\$ 97,854	-10.7%	\$ 95,452	\$ 95,452	-8.0%	\$ 7,031	0	\$0	11	\$77,342	6	
Assistant Child Support Officer	PS	\$ 47,216	\$ 57,962	-22.8%	\$ 56,320	\$ 56,320	-19.3%	\$ 9,104	0	\$0	8	\$72,831	12	
Assistant Division Chief, Assessor/Recorder/County Clerk	MM	\$ 83,200	\$ 125,520	-50.9%	\$ 124,675	\$ 124,675	-49.9%	\$ 41,475	8	\$331,802	8	\$331,802	4	
Assistant Engineer	PR	\$ 92,893	\$ 94,456	-1.7%	\$ 89,247	\$ 89,247	3.9%	\$ -3,645	0	\$0	43	\$0	13	
Assistant Health Physicist	PR	\$ 94,037				\$ 97,851	-4.1%	\$ 3,814	0	\$0	0	\$0	0	Internal Alignment: Anchor to Industrial Hygienist II
Assistant Manager, Sheriff's Food Services	MM	\$ 96,013	\$ 93,746	2.4%	\$ 92,475	\$ 92,475	3.7%	\$ -3,538	2	\$0	2	\$0	9	
Assistant Meteorologist	PR	\$ 85,259	\$ 109,499	-28.4%	\$ 98,270	\$ 91,394	-7.2%	\$ 6,135	0	\$0	0	\$0	2	Internal Alignment: 20% above Hydrographic Instrument Technician
Assistant Procurement Specialist	AE	\$ 60,237	\$ 66,649	-10.6%	\$ 62,547	\$ 62,547	-3.8%	\$ 2,310	0	\$0	4	\$9,241	11	

County of San Diego
Appendix I: Results Summary
August 2021

Classification	Bargaining Unit	Top Annual Salary			Adjusted Top Annual Salary			Cost Difference (Median Annual)	# of Budgeted Positions per Class	Cost per Budgeted Positions	# of Incumbents per Class	Cost per Actual Incumbents	# of Matches	Alignment
		Top Annual Salary	Median of Comparators	% above or below	Median of Comparators	Recommended Salary	% above or below							
Assistant Real Property Agent	PR	\$ 67,226	\$ 79,834	-18.8%	\$ 74,838	\$ 74,838	-11.3%	\$ 7,612	0	\$0	0	\$0	8	
Assistant Surveyor	PR	\$ 92,893	\$ 110,847	-19.3%	\$ 103,137	\$ 103,137	-11.0%	\$ 10,244	3	\$30,731	3	\$30,731	6	
Assistant Transportation Specialist	PR	\$ 91,832	\$ 82,326	10.4%	\$ 79,256	\$ 79,256	13.7%	\$ -12,576	0	\$0	0	\$0	5	
Assistant Weapons Coordinator	PS	\$ 71,573	\$ 73,403	-2.6%	\$ 71,935	\$ 76,162	-6.4%	\$ 4,589	3	\$13,768	2	\$9,178	3	Internal Alignment: Anchor to Hydrographic Instrument Technician
Associate Accountant	AE	\$ 74,110	\$ 82,085	-10.8%	\$ 74,269	\$ 74,269	-0.2%	\$ 158	95	\$15,025	59	\$9,331	13	
Associate Air Pollution Chemist*	PR	\$ 97,344	\$ 107,258	-10.2%	\$ 96,091	\$ 116,467	-19.6%	\$ 19,123	16	\$305,972	15	\$286,849	2	Internal Alignment: 15% above Assistant Air Pollution Chemist
Associate Air Pollution Control Engineer*	PR	\$ 102,627	\$ 106,827	-4.1%	\$ 105,045	\$ 105,045	-2.4%	\$ 2,418	20	\$48,353	6	\$14,506	6	
Associate Air Resources Specialist*	PR	\$ 88,462	\$ 113,723	-28.6%	\$ 102,560	\$ 102,560	-15.9%	\$ 14,098	4	\$56,391	4	\$56,391	4	
Associate Health Physicist	PR	\$ 110,157	\$ 103,240	6.3%	\$ 99,317	\$ 107,636	2.3%	\$ -2,521	3	\$0	2	\$0	1	Internal Alignment: 10% above Assistant Health Physicist
Associate Meteorologist	PR	\$ 98,779	\$ 115,231	-16.7%	\$ 103,004	\$ 100,533	-1.8%	\$ 1,754	4	\$7,015	3	\$5,261	2	Internal Alignment: 10% above Assistant Meteorologist
Associate Real Property Agent	PR	\$ 83,242	\$ 95,964	-15.3%	\$ 91,893	\$ 91,893	-10.4%	\$ 8,651	2	\$17,302	3	\$25,953	11	
Associate Transportation Specialist	PR	\$ 108,472	\$ 107,305	1.1%	\$ 92,092	\$ 92,092	15.1%	\$ -16,380	1	\$0	0	\$0	9	
Audit-Appraiser I	AE	\$ 72,093	\$ 69,306	3.9%	\$ 67,512	\$ 67,512	6.4%	\$ -4,581	0	\$0	0	\$0	11	
Audit-Appraiser II	AE	\$ 82,368	\$ 86,211	-4.7%	\$ 80,706	\$ 80,706	2.0%	\$ -1,662	7	\$0	6	\$0	12	
Audit-Appraiser III	AE	\$ 93,080	\$ 92,373	0.8%	\$ 88,711	\$ 88,711	4.7%	\$ -4,369	9	\$0	8	\$0	11	
Audit-Appraiser IV	AE	\$ 102,378	\$ 100,485	1.8%	\$ 95,416	\$ 95,416	6.8%	\$ -6,962	3	\$0	3	\$0	7	
Biostatistician	PR	\$ 87,942	\$ 86,681	1.4%	\$ 77,198	\$ 77,198	12.2%	\$ -10,744	0	\$0	0	\$0	4	
Broadcast Engineer	PS	\$ 95,160	\$ 98,482	-3.5%	\$ 98,422	\$ 98,422	-3.4%	\$ 3,262	1	\$3,262	1	\$3,262	6	
Building Maintenance Supervisor	MM	\$ 85,259	\$ 100,027	-17.3%	\$ 98,027	\$ 98,027	-15.0%	\$ 12,767	15	\$191,512	14	\$178,745	13	
Building/Enforcement Supervisor	MM	\$ 97,490	\$ 114,134	-17.1%	\$ 108,055	\$ 108,055	-10.8%	\$ 10,566	3	\$31,697	3	\$31,697	10	
Cadastral Supervisor	MM	\$ 93,163	\$ 93,077	0.1%	\$ 85,453	\$ 85,453	8.3%	\$ -7,710	1	\$0	1	\$0	11	
Cadastral Technician	AE	\$ 64,563	\$ 72,329	-12.0%	\$ 67,012	\$ 67,012	-3.8%	\$ 2,448	6	\$14,691	7	\$17,139	12	
Cashier	CL	\$ 45,032	\$ 56,278	-25.0%	\$ 50,306	\$ 50,306	-11.7%	\$ 5,274	11	\$58,014	10	\$52,740	4	
Certified Nurse Assistant	HS	\$ 43,430	\$ 47,545	-9.5%	\$ 43,089	\$ 43,089	0.8%	\$ -341	184	\$0	169	\$0	7	
Certified Nurse Practitioner	RN	\$ 115,253	\$ 138,611	-20.3%	\$ 135,839	\$ 135,839	-17.9%	\$ 20,586	9	\$185,275	4	\$82,345	13	
Chaplain-Coordinator	PR	\$ 63,003	\$ 92,191	-46.3%	\$ 79,990	\$ 79,990	-27.0%	\$ 16,987	0	\$0	0	\$0	4	
Child Support Officer	PS	\$ 66,227	\$ 66,072	0.2%	\$ 63,517	\$ 63,517	4.1%	\$ -2,711	218	\$0	180	\$0	13	
Civil Engineer	PR	\$ 111,675	\$ 126,589	-13.4%	\$ 120,327	\$ 120,327	-7.7%	\$ 8,651	91	\$787,272	32	\$276,843	13	
Clinical Psychologist	PR	\$ 86,486	\$ 110,408	-27.7%	\$ 106,351	\$ 106,351	-23.0%	\$ 19,864	1	\$19,864	3	\$59,593	12	
Code Enforcement Officer	PS	\$ 73,694	\$ 84,049	-14.1%	\$ 80,527	\$ 80,527	-9.3%	\$ 6,833	12	\$81,992	10	\$68,326	10	
Communicable Disease Investigator	PS	\$ 70,283	\$ 71,585	-1.9%	\$ 69,727	\$ 69,727	0.8%	\$ -556	26	\$0	21	\$0	12	
Community Health Program Specialist	PR	\$ 89,315	\$ 102,832	-15.1%	\$ 92,583	\$ 92,583	-3.7%	\$ 3,268	33	\$107,852	26	\$84,974	10	
Community Health Promotion Assistant	PR	\$ 55,952	\$ 59,718	-6.7%	\$ 59,340	\$ 59,340	-6.1%	\$ 3,388	0	\$0	0	\$0	10	
Community Health Promotion Specialist I	PR	\$ 68,037	\$ 69,405	-2.0%	\$ 69,779	\$ 69,779	-2.6%	\$ 1,742	3	\$5,227	6	\$10,453	8	
Community Health Promotion Specialist II	PR	\$ 76,253	\$ 85,752	-12.5%	\$ 82,401	\$ 82,401	-8.1%	\$ 6,148	30	\$184,453	18	\$110,672	12	
Community Services Officer	PS	\$ 47,382	\$ 66,455	-40.3%	\$ 56,790	\$ 56,790	-19.9%	\$ 9,408	59	\$555,043	50	\$470,375	11	
Construction Technician (T)	PS	\$ 109,678	\$ 106,073	3.3%	\$ 94,299	\$ 94,299	14.0%	\$ -15,380	1	\$0	2	\$0	5	
Cook	FS	\$ 42,578	\$ 55,826	-31.1%	\$ 50,363	\$ 50,363	-18.3%	\$ 7,786	8	\$62,286	15	\$116,786	12	
Coordinator, Volunteer & Public Services	PS	\$ 84,240	\$ 81,866	2.8%	\$ 75,300	\$ 75,300	10.6%	\$ -8,940	10	\$0	8	\$0	6	
Coordinator, Volunteer Services	PS	\$ 61,714	\$ 57,704	6.5%	\$ 59,445	\$ 59,445	3.7%	\$ -2,269	2	\$0	3	\$0	6	
Correctional Counselor	PR	\$ 83,200	\$ 89,230	-7.2%	\$ 85,895	\$ 72,018	13.4%	\$ -11,182	43	\$0	31	\$0	3	Internal Alignment: 20% below Supervising Correctional Counselor
Crime Prevention Specialist	PS	\$ 51,979	\$ 66,455	-27.8%	\$ 58,196	\$ 58,196	-12.0%	\$ 6,217	21	\$130,560	19	\$118,126	5	
Criminal Legal Secretary I	CL	\$ 60,694	\$ 58,322	3.9%	\$ 54,694	\$ 54,694	9.9%	\$ -6,000	0	\$0	10	\$0	8	
Criminal Legal Secretary II	CL	\$ 64,854	\$ 66,774	-3.0%	\$ 64,650	\$ 64,650	0.3%	\$ -204	45	\$0	34	\$0	12	
Criminal Legal Secretary III	MM	\$ 69,306	\$ 70,325	-1.5%	\$ 68,918	\$ 68,918	0.6%	\$ -387	6	\$0	7	\$0	9	

County of San Diego
Appendix I: Results Summary
August 2021

Classification	Bargaining Unit	Top Annual Salary			Adjusted Top Annual Salary			Cost Difference (Median Annual)	# of Budgeted Positions per Class	Cost per Budgeted Positions	# of Incumbents per Class	Cost per Actual Incumbents	# of Matches	Alignment
		Top Annual Salary	Median of Comparators	% above or below	Median of Comparators	Recommended Salary	% above or below							
Criminalist I	PR	\$ 102,274	\$ 99,403	2.8%	\$ 87,904	\$ 87,904	14.0%	\$ -14,369	0	\$0	2	\$0	11	
Criminalist II	PR	\$ 120,765	\$ 113,268	6.2%	\$ 105,729	\$ 105,729	12.5%	\$ -15,036	26	\$0	25	\$0	12	
Criminalist III	PR	\$ 127,837	\$ 127,712	0.1%	\$ 117,672	\$ 117,672	8.0%	\$ -10,164	11	\$0	9	\$0	11	
Departmental Clerk	CL	\$ 35,589	\$ 41,439	-16.4%	\$ 40,788	\$ 40,788	-14.6%	\$ 5,200	0	\$0	0	\$0	11	
Departmental Payroll Technician	CL	\$ 46,987	\$ 63,603	-35.4%	\$ 60,110	\$ 60,110	-27.9%	\$ 13,123	0	\$0	1	\$13,123	7	
Deputy Medical Examiner I	PR	\$ 185,661	\$ 279,411	-50.5%	\$ 260,501	\$ 257,895	-38.9%	\$ 72,234	0	\$0	0	\$0	2	Internal Alignment: 10% below Deputy Medical Examiner II
Deputy Medical Examiner II	PR	\$ 238,514	\$ 314,181	-31.7%	\$ 286,550	\$ 286,550	-20.1%	\$ 48,037	6	\$288,220	5	\$240,183	4	
Deputy Public Admin-Guardian	PS	\$ 67,538	\$ 75,570	-11.9%	\$ 72,775	\$ 72,775	-7.8%	\$ 5,237	15	\$78,562	15	\$78,562	12	
Deputy Sheriff Cadet-Detentions/Court Services	PS	\$ 45,074	\$ 69,966	-55.2%	\$ 67,886	\$ 67,886	-50.6%	\$ 22,813	0	\$0	45	\$1,026,573	4	
Deputy Sheriff's Cadet	PS	\$ 56,867	\$ 73,009	-28.4%	\$ 71,378	\$ 71,378	-25.5%	\$ 14,511	0	\$0	58	\$841,616	12	
Detentions Information Assistant	CL	\$ 47,403	\$ 64,110	-35.2%	\$ 56,905	\$ 56,905	-20.0%	\$ 9,501	70	\$665,104	53	\$503,579	4	
Detentions Processing Supervisor	MM	\$ 61,381	\$ 72,449	-18.0%	\$ 67,822	\$ 69,463	-13.2%	\$ 8,082	29	\$234,383	28	\$226,300	2	Internal Alignment: 15% above Detentions Processing Technician
Detentions Processing Technician	CL	\$ 52,728	\$ 66,088	-25.3%	\$ 60,403	\$ 60,403	-14.6%	\$ 7,675	171	\$1,312,456	147	\$1,128,252	6	
Dietitian	PR	\$ 59,010	\$ 77,958	-32.1%	\$ 76,727	\$ 76,727	-30.0%	\$ 17,717	2	\$35,434	1	\$17,717	9	
Disease Research Scientist	PR	\$ 77,792	\$ 103,793	-33.4%	\$ 100,774	\$ 100,774	-29.5%	\$ 22,982	1	\$22,982	1	\$22,982	4	
Drafting Technician	PS	\$ 61,568	\$ 72,329	-17.5%	\$ 71,304	\$ 71,304	-15.8%	\$ 9,736	0	\$0	0	\$0	10	
Election Processing Supervisor	MM	\$ 72,821	\$ 77,122	-5.9%	\$ 70,178	\$ 70,178	3.6%	\$ -2,643	8	\$0	8	\$0	10	
Electronic Instrument Technician I	PS	\$ 70,304	\$ 82,609	-17.5%	\$ 78,109	\$ 78,109	-11.1%	\$ 7,805	0	\$0	2	\$15,611	4	
Electronic Instrument Technician II	PS	\$ 77,584	\$ 96,643	-24.6%	\$ 85,854	\$ 85,854	-10.7%	\$ 8,270	12	\$99,235	7	\$57,887	7	
Emergency Medical Services Specialist	PR	\$ 89,752	\$ 86,334	3.8%	\$ 87,974	\$ 87,974	2.0%	\$ -1,778	6	\$0	2	\$0	9	
Emergency Services Coordinator	MM	\$ 88,192	\$ 96,399	-9.3%	\$ 92,092	\$ 92,092	-4.4%	\$ 3,900	5	\$19,502	3	\$11,701	9	
Engineering Technician I	PS	\$ 65,790	\$ 73,747	-12.1%	\$ 66,459	\$ 66,459	-1.0%	\$ 669	0	\$0	2	\$1,338	11	
Engineering Technician II	PS	\$ 74,318	\$ 79,128	-6.5%	\$ 73,546	\$ 73,546	1.0%	\$ -772	9	\$0	9	\$0	12	
Engineering Technician III	PS	\$ 84,614	\$ 88,164	-4.2%	\$ 85,524	\$ 85,524	-1.1%	\$ 909	19	\$17,280	16	\$14,552	12	
Environmental Health Specialist I	PR	\$ 75,546	\$ 73,829	2.3%	\$ 71,203	\$ 71,203	5.7%	\$ -4,343	0	\$0	18	\$0	8	
Environmental Health Specialist II	PR	\$ 82,909	\$ 88,235	-6.4%	\$ 88,421	\$ 88,421	-6.6%	\$ 5,512	105	\$578,796	61	\$336,253	13	
Environmental Health Specialist III	PR	\$ 91,208	\$ 98,026	-7.5%	\$ 97,340	\$ 97,340	-6.7%	\$ 6,132	44	\$269,812	32	\$196,227	13	
Environmental Health Specialist Trainee	PR	\$ 66,144	\$ 67,839	-2.6%	\$ 67,907	\$ 67,907	-2.7%	\$ 1,763	0	\$0	14	\$24,680	9	
Environmental Health Technician	PS	\$ 48,152	\$ 67,402	-40.0%	\$ 62,032	\$ 62,032	-28.8%	\$ 13,880	22	\$305,368	18	\$249,846	11	
Epidemiologist I	PR	\$ 94,557	\$ 98,773	-4.5%	\$ 83,132	\$ 83,132	12.1%	\$ -11,425	3	\$0	10	\$0	5	
Epidemiologist II	PR	\$ 104,062	\$ 109,054	-4.8%	\$ 96,622	\$ 96,622	7.1%	\$ -7,440	44	\$0	29	\$0	9	
Estate Assistant	PS	\$ 50,648	\$ 56,597	-11.7%	\$ 55,465	\$ 52,408	-3.5%	\$ 1,760	3	\$5,280	3	\$5,280	3	Internal Alignment: Anchor to Office Support Specialist
Estate Property Manager	MM	\$ 76,003	\$ 79,260	-4.3%	\$ 79,339	\$ 79,339	-4.4%	\$ 3,336	1	\$3,336	1	\$3,336	5	
Executive Housekeeper	MM	\$ 56,472	\$ 43,413	23.1%	\$ 44,238	\$ 44,238	21.7%	\$ -12,234	2	\$0	2	\$0	3	Above Market N/A
Facility Services Contract Specialist	PS	\$ 66,456	\$ 59,139	11.0%	\$ 58,725	\$ 58,725	11.6%	\$ -7,731	3	\$0	4	\$0	3	Above Market N/A
Fleet Parts Specialist	AE	\$ 53,810	\$ 61,013	-13.4%	\$ 57,698	\$ 57,698	-7.2%	\$ 3,889	3	\$11,667	3	\$11,667	12	
Fleet Standards Technician	AE	\$ 64,251	\$ 76,939	-19.7%	\$ 68,168	\$ 66,353	-3.3%	\$ 2,102	4	\$8,407	4	\$8,407	3	Internal Alignment: 15% above Fleet Parts Specialist
Fleet Support Specialist	PR	\$ 81,474	\$ 119,103	-46.2%	\$ 99,094	\$ 82,941	-1.8%	\$ 1,467	1	\$1,467	1	\$1,467	1	Internal Alignment: 25% above Fleet Standards Tech
Food Services Supervisor	MM	\$ 55,723	\$ 61,124	-9.7%	\$ 59,813	\$ 59,813	-7.3%	\$ 4,089	14	\$57,253	14	\$57,253	10	
Food Services Worker	FS	\$ 34,050	\$ 39,334	-15.5%	\$ 39,121	\$ 39,121	-14.9%	\$ 5,071	55	\$278,912	50	\$253,556	12	
Forensic Autopsy Room Supervisor	MM	\$ 91,582	\$ 78,772	14.0%	\$ 77,900	\$ 77,900	14.9%	\$ -13,682	1	\$0	1	\$0	4	
Forensic Autopsy Specialist	PS	\$ 66,269	\$ 63,554	4.1%	\$ 60,100	\$ 60,100	9.3%	\$ -6,169	7	\$0	6	\$0	10	
Forensic Documents Examiner	PR	\$ 119,330	\$ 122,993	-3.1%	\$ 112,409	\$ 112,409	5.8%	\$ -6,920	1	\$0	1	\$0	4	
Forensic Evidence Technician	PS	\$ 78,686	\$ 78,170	0.7%	\$ 73,537	\$ 73,537	6.5%	\$ -5,149	8	\$0	8	\$0	6	
Geographic Information Systems Analyst	PR	\$ 77,230	\$ 103,627	-34.2%	\$ 98,907	\$ 98,907	-28.1%	\$ 21,677	14	\$303,477	6	\$130,062	9	

County of San Diego
Appendix I: Results Summary
August 2021

	Bargaining	Top Annual Salary			Adjusted Top Annual Salary			Cost Difference	# of Budgeted	Cost per	# of	Cost per Actual	# of	
Geographic Information Systems Technician	PS	\$ 57,096	\$ 69,929	-22.5%	\$ 69,280	\$ 69,280	-21.3%	\$ 12,184	0	\$0	4	\$48,738	9	
Graphic Artist	PS	\$ 64,064	\$ 65,936	-2.9%	\$ 64,617	\$ 64,617	-0.9%	\$ 553	2	\$1,107	2	\$1,107	9	
Graphic Design Specialist	PS	\$ 81,973	\$ 74,197	9.5%	\$ 69,300	\$ 69,300	15.5%	\$ -12,673	1	\$0	1	\$0	9	
Groundwater Geologist	PR	\$ 120,037	\$ 108,135	9.9%	\$ 106,673	\$ 106,673	11.1%	\$ -13,364	0	\$0	0	\$0	6	
Health Information Management Clerk	CL	\$ 43,098	\$ 59,374	-37.8%	\$ 52,606		-16.4%	\$ 7,082	4	\$28,327	6	\$42,491	3	Internal Alignment: 10% below Health Information Management Technician
Health Information Management Technician	HS	\$ 47,403	\$ 62,716	-32.3%	\$ 55,755	\$ 55,755	-17.6%	\$ 8,352	44	\$367,474	33	\$275,605	5	
Health Information Specialist I	PR	\$ 67,226	\$ 65,936	1.9%	\$ 64,617	\$ 64,617	3.9%	\$ -2,608	2	\$0	2	\$0	5	
Health Information Specialist II	PR	\$ 76,253	\$ 75,691	0.7%	\$ 74,177	\$ 74,177	2.7%	\$ -2,075	12	\$0	7	\$0	9	
Health Services Social Worker	SW	\$ 74,922	\$ 90,654	-21.0%	\$ 85,062	\$ 85,062	-13.5%	\$ 10,140	3	\$30,420	3	\$30,420	10	
	AE	\$ 81,557	\$ 80,179		\$ 80,259	\$ 80,259		\$ -1,298	9	\$0	8	\$0	5	
Histology Technician	HS	\$ 60,882	\$ 72,750	-19.5%	\$ 69,985	\$ 69,985	-15.0%	\$ 9,103	0	\$0	0	\$0	7	
Historian	PR	\$ 91,416	\$ 98,795	-8.1%	\$ 100,672	\$ 100,672	-10.1%	\$ 9,256	0	\$0	0	\$0	3	No alignment found
Housing Aide*	PS	\$ 45,490	\$ 56,273	-23.7%	\$ 54,413	\$ 54,413	-19.6%	\$ 8,923	6	\$53,539	6	\$53,539	6	
Housing Program Analyst I*	PR	\$ 80,933	\$ 69,306	14.4%	\$ 70,622	\$ 70,622	12.7%	\$ -10,310	2	\$0	5	\$0	7	
Housing Program Analyst II*	PR	\$ 89,315	\$ 86,525	3.1%	\$ 86,612	\$ 86,612	3.0%	\$ -2,704	6	\$0	4	\$0	9	
Housing Program Analyst III*	PR	\$ 95,722	\$ 106,941	-11.7%	\$ 101,010	\$ 101,010	-5.5%	\$ 5,288	5	\$26,442	2	\$10,577	8	
Housing Program Analyst IV*	PR	\$ 104,312	\$ 127,485	-22.2%	\$ 115,811	\$ 115,811	-11.0%	\$ 11,499	4	\$45,994	3	\$34,496	7	
Housing Specialist I*	PS	\$ 56,410	\$ 55,896	0.9%	\$ 54,387	\$ 54,387	3.6%	\$ -2,023	4	\$0	0	\$0	7	
Housing Specialist II*	PS	\$ 66,747	\$ 62,555	6.3%	\$ 60,902	\$ 60,902	8.8%	\$ -5,845	43	\$0	49	\$0	10	
Housing Specialist III*	PS	\$ 77,106	\$ 84,450	-9.5%	\$ 85,561	\$ 85,561	-11.0%	\$ 8,455	6	\$50,732	7	\$59,187	10	
Human Services Control Specialist	SW	\$ 60,424	\$ 88,051	-45.7%	\$ 78,083	\$ 78,083	-29.2%	\$ 17,659	32	\$565,083	29	\$512,106	7	
Human Services Specialist	SW	\$ 57,491	\$ 58,857	-2.4%	\$ 58,235	\$ 58,235	-1.3%	\$ 744	1736	\$1,291,538	1656	\$1,232,020	12	
Hydrogeologist	PR	\$ 109,470	\$ 124,169	-13.4%	\$ 110,902	\$ 96,006	12.3%	\$ -13,464	0	\$0	1	\$0	2	Internal Alignment: 10% below Senior Hydrogeologist
Hydrographic Instrument Technician	PS	\$ 77,376				\$ 76,162	1.6%	\$ -1,214	2	\$0	1	\$0	0	Internal Alignment: 10% below Junior Surveyor
Imaging Technician I	CL	\$ 47,320	\$ 46,295	2.2%	\$ 44,633	\$ 44,633	5.7%	\$ -2,687	0	\$0	1	\$0	4	
Imaging Technician II	CL	\$ 52,936	\$ 50,482	4.6%	\$ 48,699	\$ 48,699	8.0%	\$ -4,237	10	\$0	10	\$0	5	
Imaging Technician III	MM	\$ 60,611	\$ 67,836	-11.9%	\$ 61,429	\$ 56,004	7.6%	\$ -4,607	3	\$0	2	\$0	2	Internal Alignment: 15% above Imaging Technician II
Industrial Hygienist I	PR	\$ 87,422	\$ 66,029	24.5%	\$ 68,118	\$ 88,066	-0.7%	\$ 644	0	\$0	1	\$644	4	Internal Alignment: 10% below Industrial Hygienist II
Industrial Hygienist II	PR	\$ 97,074	\$ 101,716	-4.8%	\$ 97,851	\$ 97,851	-0.8%	\$ 777	4	\$3,110	3	\$2,332	9	
	PR	\$ 101,920	\$ 92,488		\$ 94,245		-5.6%	\$ 5,716	1	\$5,716	0	\$0	5	Internal Alignment: 10% above Industrial Hygienist II
Insect Detection Specialist I	PS	\$ 39,374	\$ 42,307	-7.4%	\$ 42,011	\$ 42,011	-6.7%	\$ 2,637	0	\$0	0	\$0	5	
Insect Detection Specialist II	PS	\$ 46,509	\$ 60,876	-30.9%	\$ 58,645	\$ 58,645	-26.1%	\$ 12,136	37	\$449,032	31	\$376,216	7	
Inservice Education Coordinator	RN	\$ 105,685	\$ 148,207	-40.2%	\$ 142,576	\$ 134,886	-27.6%	\$ 29,201	4	\$116,805	3	\$87,603	3	Internal Alignment: 5% above Public Health Nurse Supervisor
International Case Coordinator	PS	\$ 115,024				\$ 101,516	11.7%	\$ -13,508	1	\$0	1	\$0	0	Internal Alignment: Anchor to Public Defender Investigator II
Investigative Specialist	PS	\$ 49,712	\$ 53,899	-8.4%	\$ 53,521	\$ 53,521	-7.7%	\$ 3,809	13	\$49,522	11	\$41,903	7	
Investigative Technician	PS	\$ 79,622	\$ 78,355	1.6%	\$ 77,551	\$ 77,551	2.6%	\$ -2,071	0	\$0	0	\$0	4	
Jr Air Pollution Chemist*	PR	\$ 75,670				\$ 88,066	-16.4%	\$ 12,396	0	\$0	0	\$0	0	Internal Alignment: Anchor to Industrial Hygienist I
Jr Air Pollution Control Engineer*	PR	\$ 76,419	\$ 92,232	-20.7%	\$ 89,650	\$ 85,907	-12.4%	\$ 9,488	0	\$0	1	\$9,488	1	Internal Alignment: 10% below Assistant Air Pollution Control Engineer
Jr Land Use/Environmental Planner*	PR	\$ 66,352	\$ 74,194	-11.8%	\$ 68,990	\$ 68,990	-4.0%	\$ 2,638	1	\$2,638	7	\$18,469	5	
Jr Public Health Microbiologist	PR	\$ 62,858	\$ 69,950	-11.3%	\$ 71,279	\$ 71,279	-13.4%	\$ 8,422	3	\$25,266	3	\$25,266	11	
Jr Real Property Agent	PR	\$ 52,042	\$ 65,354	-25.6%	\$ 64,046	\$ 64,046	-23.1%	\$ 12,005	0	\$0	0	\$0	9	
Jr Surveyor (T)	PR	\$ 80,454	\$ 94,451	-17.4%	\$ 84,624	\$ 84,624	-5.2%	\$ 4,170	0	\$0	3	\$12,509	5	
Laboratory Assistant	HS	\$ 43,784	\$ 53,539	-22.3%	\$ 48,960	\$ 48,960	-11.8%	\$ 5,176	11	\$56,934	6	\$31,055	11	
Land Surveyor	PR	\$ 109,470	\$ 124,591	-13.8%	\$ 110,936	\$ 110,936	-1.3%	\$ 1,465	12	\$17,584	5	\$7,327	7	
Land Use Aide	PS	\$ 48,485	\$ 46,145		\$ 46,191		-2.6%	\$ 1,277	2	\$2,554	5	\$6,386	3	Internal Alignment: 15% below Land Use Technician I

County of San Diego
Appendix I: Results Summary
August 2021

Classification	Bargaining Unit	Top Annual Salary			Adjusted Top Annual Salary			Cost Difference (Median Annual)	# of Budgeted Positions per Class	Cost per Budgeted Positions	# of Incumbents per Class	Cost per Actual Incumbents	# of Matches	Alignment
		Top Annual Salary	Median of Comparators	% above or below	Median of Comparators	Recommended Salary	% above or below							
Land Use Technician I	PS	\$ 56,014	\$ 61,258	-9.4%	\$ 58,543	\$ 58,543	-4.5%	\$ 2,528	2	\$5,057	7	\$17,699	7	
Land Use Technician II	PS	\$ 74,194	\$ 72,170	2.7%	\$ 67,484	\$ 67,484	9.0%	\$ -6,709	9	\$0	4	\$0	8	
Land Use Technician III	PS	\$ 81,869	\$ 86,220	-5.3%	\$ 85,048	\$ 85,048	-3.9%	\$ 3,179	10	\$31,794	6	\$19,076	6	
Land Use/Environmental Planner I	PR	\$ 79,622	\$ 82,763	-3.9%	\$ 81,108	\$ 81,108	-1.9%	\$ 1,485	8	\$11,884	12	\$17,826	9	
Land Use/Environmental Planner II	PR	\$ 93,850	\$ 100,865	-7.5%	\$ 91,869	\$ 91,869	2.1%	\$ -1,981	46	\$0	39	\$0	12	
Land Use/Environmental Planner III	PR	\$ 107,619	\$ 114,587	-6.5%	\$ 109,357	\$ 109,357	-1.6%	\$ 1,737	49	\$85,126	43	\$74,702	11	
Landscape Architect	PR	\$ 96,429	\$ 124,591	-29.2%	\$ 120,441	\$ 120,441	-24.9%	\$ 24,012	1	\$24,012	1	\$24,012	3	No alignment found
Latent Print Examiner	PS	\$ 95,430	\$ 87,078	8.8%	\$ 88,311	\$ 88,311	7.5%	\$ -7,119	6	\$0	6	\$0	6	
Laundry Supervisor	MM	\$ 54,891	\$ 54,532	0.7%	\$ 54,150	\$ 54,521	0.7%	\$ -370	1	\$0	1	\$0	3	Internal Alignment: 20% above Senior Laundry Worker
Laundry Worker	FS	\$ 42,432	\$ 38,177	10.0%	\$ 38,167	\$ 38,167	10.1%	\$ -4,265	23	\$0	22	\$0	10	
Legal Support Assistant I	CL	\$ 43,160	\$ 54,757	-26.9%	\$ 54,340	\$ 54,340	-25.9%	\$ 11,180	10	\$111,798	55	\$614,889	8	
Legal Support Assistant II	CL	\$ 48,714	\$ 64,813	-33.0%	\$ 57,835	\$ 57,835	-18.7%	\$ 9,122	232	\$2,116,246	148	\$1,350,019	11	
Legal Support Assistant III	CL	\$ 55,037	\$ 68,024	-23.6%	\$ 66,053	\$ 66,053	-20.0%	\$ 11,016	69	\$760,118	52	\$572,842	10	
Legal Support Supervisor I	MM	\$ 65,166	\$ 68,528	-5.2%	\$ 68,597	\$ 68,597	-5.3%	\$ 3,430	37	\$126,918	33	\$113,197	5	
Legal Support Supervisor II	MM	\$ 69,306	\$ 76,427	-10.3%	\$ 73,523	\$ 73,523	-6.1%	\$ 4,217	31	\$130,732	24	\$101,212	5	
Librarian I	PR	\$ 71,365	\$ 80,451	-12.7%	\$ 70,258	\$ 70,258	1.6%	\$ -1,107	43	\$0	40	\$0	10	
Librarian II	PR	\$ 78,853	\$ 87,160	-10.5%	\$ 78,453	\$ 78,453	0.5%	\$ -400	29	\$0	25	\$0	11	
Librarian III	PR	\$ 86,819	\$ 99,501	-14.6%	\$ 91,796	\$ 91,796	-5.7%	\$ 4,977	17	\$84,607	17	\$84,607	10	
Librarian Substitute	PR	\$ 70,574	\$ 67,236	4.7%	\$ 59,571	\$ 66,745	5.4%	\$ -3,829	0	\$0	0	\$0	1	Internal Alignment: 5% below Librarian I
Library Associate	PR	\$ 68,307	\$ 77,304	-13.2%	\$ 68,609	\$ 70,588	-3.3%	\$ 2,281	6	\$13,685	3	\$6,842	2	Internal Alignment: 5% above Library Technician IV
Library Technician I	PS	\$ 38,334	\$ 50,697	-32.2%	\$ 45,925	\$ 45,925	-19.8%	\$ 7,591	71	\$538,946	69	\$523,765	7	
Library Technician II	PS	\$ 47,341	\$ 54,704	-15.6%	\$ 53,373	\$ 53,373	-12.7%	\$ 6,032	54	\$325,723	46	\$277,468	7	
Library Technician III	PS	\$ 54,642	\$ 61,545	-12.6%	\$ 61,115	\$ 61,115	-11.8%	\$ 6,473	35	\$226,556	37	\$239,502	5	
Library Technician IV	PS	\$ 63,544	\$ 66,237	-4.2%	\$ 63,720	\$ 67,227	-5.8%	\$ 3,683	16	\$58,929	14	\$51,563	3	Internal Alignment: 10% above Library Technician III
Library Technician Substitute	PS	\$ 32,198	\$ 50,486	-56.8%	\$ 44,730	\$ 43,629	-35.5%	\$ 11,431	0	\$0	0	\$0	1	Internal Alignment: 5% below Library Technician I
Licensed Mental Health Clinician	PR	\$ 94,702	\$ 90,924	4.0%	\$ 90,602	\$ 90,602	4.3%	\$ -4,101	65	\$0	51	\$0	11	
Licensed Vocational Nurse	HS	\$ 52,603	\$ 60,912	-15.8%	\$ 58,801	\$ 58,801	-11.8%	\$ 6,198	32	\$198,335	38	\$235,523	13	
Litigation Investigator	PS	\$ 97,386	\$ 123,974	-27.3%	\$ 110,363	\$ 110,363	-13.3%	\$ 12,977	0	\$0	0	\$0	4	
Mail Carrier	PS	\$ 41,454	\$ 46,693	-12.6%	\$ 44,919	\$ 44,919	-8.4%	\$ 3,464	15	\$51,967	15	\$51,967	9	
Mail Processor	PS	\$ 39,437	\$ 45,706	-15.9%	\$ 45,981	\$ 45,981	-16.6%	\$ 6,545	0	\$0	0	\$0	6	
Mail Systems Supervisor	MM	\$ 60,944	\$ 71,386	-17.1%	\$ 61,039	\$ 61,039	-0.2%	\$ 95	1	\$95	1	\$95	5	
Medical Claims Specialist	CL	\$ 49,816	\$ 66,360	-33.2%	\$ 60,309	\$ 60,309	-21.1%	\$ 10,493	14	\$146,898	14	\$146,898	8	
Medical Consultant	PR	\$ 194,210	\$ 187,141	3.6%	\$ 184,323	\$ 198,011	-2.0%	\$ 3,801	5	\$19,007	3	\$11,404	2	Internal Alignment: 25% below Psychiatrist
Medical Examiner Invest I	PS	\$ 63,731	\$ 86,231	-35.3%	\$ 81,109	\$ 81,109	-27.3%	\$ 17,378	0	\$0	3	\$52,133	7	
Medical Examiner Invest II	PS	\$ 77,501	\$ 95,781	-23.6%	\$ 92,847	\$ 92,847	-19.8%	\$ 15,346	16	\$245,532	11	\$168,804	10	
Medical Examiner Invest III	MM	\$ 85,862	\$ 115,078	-34.0%	\$ 108,598	\$ 108,598	-26.5%	\$ 22,735	3	\$68,205	3	\$68,205	4	
Medical Transcriber	CL	\$ 50,814	\$ 58,977	-16.1%	\$ 54,828	\$ 54,828	-7.9%	\$ 4,013	1	\$4,013	1	\$4,013	10	
Mental Health Aide	HS	\$ 43,597	\$ 52,016	-19.3%	\$ 50,039	\$ 51,567	-18.3%	\$ 7,970	20	\$159,403	15	\$119,552	3	Internal Alignment: 10% below Mental Health Specialist
Mental Health Case Management Assistant	HS	\$ 44,990	\$ 53,617	-19.2%	\$ 53,345	\$ 53,345	-18.6%	\$ 8,354	8	\$66,836	7	\$58,481	8	
Mental Health Case Management Clinician	PR	\$ 72,654	\$ 82,996	-14.2%	\$ 79,401	\$ 79,401	-9.3%	\$ 6,746	31	\$209,139	25	\$168,660	6	
Mental Health Conservatorship Clinician	PR	\$ 91,229	\$ 107,501	-17.8%	\$ 95,511	\$ 90,602	0.7%	\$ -627	10	\$0	10	\$0	2	Internal Alignment: Anchor to Licensed Mental Health Clinician
Mental Health Specialist	HS	\$ 52,770	\$ 63,440	-20.2%	\$ 57,297	\$ 57,297	-8.6%	\$ 4,528	7	\$31,694	6	\$27,166	9	
Multimedia Designer	PR	\$ 80,933	\$ 75,442	6.8%	\$ 73,132	\$ 73,132	9.6%	\$ -7,801	8	\$0	8	\$0	7	
Nutritionist	PR	\$ 67,891	\$ 79,221	-16.7%	\$ 76,912	\$ 76,912	-13.3%	\$ 9,021	3	\$27,062	4	\$36,083	12	
Occupational/Physical Therapist	PR	\$ 96,075	\$ 105,352	-9.7%	\$ 99,372	\$ 99,372	-3.4%	\$ 3,296	31	\$102,189	32	\$105,485	13	

County of San Diego
Appendix I: Results Summary
August 2021

Classification	Bargaining Unit	Top Annual Salary			Adjusted Top Annual Salary			Cost Difference (Median Annual)	# of Budgeted Positions per Class	Cost per Budgeted Positions	# of Incumbents per Class	Cost per Actual Incumbents	# of Matches	Alignment
		Top Annual Salary	Median of Comparators	% above or below	Median of Comparators	Recommended Salary	% above or below							
Occupational/Physical Therapist Assistant	HS	\$ 63,066	\$ 79,025	-25.3%	\$ 74,046	\$ 74,046	-17.4%	\$ 10,980	0	\$0	1	\$10,980	12	
Office Assistant	CL	\$ 41,829	\$ 45,622	-9.1%	\$ 45,022	\$ 45,022	-7.6%	\$ 3,193	765	\$2,442,462	788	\$2,515,896	13	
Office Support Specialist	CL	\$ 48,422	\$ 52,963	-9.4%	\$ 52,408	\$ 52,408	-8.2%	\$ 3,986	112	\$446,382	97	\$386,599	12	
Paralegal I	PS	\$ 59,010	\$ 63,177	-7.1%	\$ 64,377	\$ 64,377	-9.1%	\$ 5,368	0	\$0	21	\$112,720	9	
Paralegal II	PS	\$ 79,082	\$ 75,338	4.7%	\$ 73,831	\$ 73,831	6.6%	\$ -5,251	158	\$0	131	\$0	11	
Paralegal Supervisor	MM	\$ 87,464	\$ 111,730	-27.7%	\$ 99,442	\$ 88,597	-1.3%	\$ 1,133	21	\$23,792	13	\$14,728	2	Internal Alignment: 20% above Paralegal II
Park Ranger	PS	\$ 56,742	\$ 61,183	-7.8%	\$ 61,128	\$ 61,128	-7.7%	\$ 4,386	59	\$258,757	49	\$214,900	8	
Parks Recreational Supervisor	MM	\$ 68,411	\$ 71,994	-5.2%	\$ 72,066	\$ 72,066	-5.3%	\$ 3,655	8	\$29,239	8	\$29,239	5	
Patient Services Specialist III (T)	SW	\$ 65,229	\$ 69,492	-6.5%	\$ 65,623	\$ 65,623	-0.6%	\$ 394	1	\$394	1	\$394	6	
Patient Services Specialist IV (T)	SS	\$ 74,235	\$ 90,371	-21.7%	\$ 84,924	\$ 84,924	-14.4%	\$ 10,689	1	\$10,689	1	\$10,689	4	
Payroll Clerk	CL	\$ 44,054	\$ 63,565	-44.3%	\$ 58,733	\$ 58,733	-33.3%	\$ 14,678	8	\$117,428	2	\$29,357	4	
Pediatrician	PR	\$ 168,834	\$ 228,680	-35.4%	\$ 229,466	\$ 229,466	-35.9%	\$ 60,632	0	\$0	0	\$0	5	
Permit Process Coordinator	MM	\$ 89,045	\$ 98,813	-11.0%	\$ 88,580	\$ 88,580	0.5%	\$ -465	2	\$0	2	\$0	4	
Pest Management Technician I	PS	\$ 56,181	\$ 45,230	19.5%	\$ 44,600	\$ 51,306	8.7%	\$ -4,875	0	\$0	1	\$0	2	Internal Alignment: 10% below Pest Management Technician II
Pest Management Technician II	PS	\$ 61,755	\$ 58,698	4.9%	\$ 57,007	\$ 57,007	7.7%	\$ -4,749	7	\$0	6	\$0	6	
Pharmacist	MM	\$ 136,635	\$ 161,356	-18.1%	\$ 145,188	\$ 145,188	-6.3%	\$ 8,553	10	\$85,531	10	\$85,531	11	
Pharmacy Stock Clerk	AE	\$ 43,035	\$ 50,703	-17.8%	\$ 49,445	\$ 49,445	-14.9%	\$ 6,409	1	\$6,409	0	\$0	6	
Pharmacy Storekeeper	MM	\$ 48,693	\$ 90,528	-85.9%	\$ 74,776	\$ 59,334	-21.9%	\$ 10,641	0	\$0	0	\$0	1	Internal Alignment: 20% above Pharmacy Stock Clerk
Pharmacy Technician	HS	\$ 55,557	\$ 55,191	0.7%	\$ 55,502	\$ 55,502	0.1%	\$ -55	11	\$0	10	\$0	10	
Photographic Audio-Visual Specialist	PS	\$ 77,210	\$ 75,296	2.5%	\$ 73,132	\$ 73,132	5.3%	\$ -4,078	6	\$0	5	\$0	7	
Physician Assistant	PR	\$ 103,230	\$ 129,612	-25.6%	\$ 130,880	\$ 130,880	-26.8%	\$ 27,650	0	\$0	0	\$0	9	
Precinct Planning Technician	PS	\$ 51,688	\$ 63,271	-22.4%	\$ 62,828	\$ 62,352	-20.6%	\$ 10,664	1	\$10,664	1	\$10,664	3	Internal Alignment: 10% below GIS Technician
Principal Treasurer-Tax Collector Specialist	MM	\$ 66,165	\$ 93,186	-40.8%	\$ 77,531	\$ 77,531	-17.2%	\$ 11,366	3	\$34,098	2	\$22,732	5	
Probation Aide	PS	\$ 54,288	\$ 66,063	-21.7%	\$ 58,730	\$ 58,730	-8.2%	\$ 4,442	22	\$97,734	19	\$84,406	7	
Probation Operations Support Manager	MM	\$ 83,533	\$ 84,854	-1.6%	\$ 79,520	\$ 79,520	4.8%	\$ -4,012	4	\$0	4	\$0	4	
Process Server	PS	\$ 47,382	\$ 53,899	-13.8%	\$ 53,521	\$ 53,521	-13.0%	\$ 6,139	1	\$6,139	1	\$6,139	5	
Process Server Supervisor	MM	\$ 54,246	\$ 54,797	-1.0%	\$ 56,011	\$ 64,225	-18.4%	\$ 9,979	1	\$9,979	1	\$9,979	2	Internal Alignment: 20% above Process Server
Procurement Contracting Officer	AE	\$ 99,362	\$ 99,385	-0.0%	\$ 88,204	\$ 88,204	11.2%	\$ -11,157	19	\$0	15	\$0	10	
Procurement Contracting Specialist	AE	\$ 83,096	\$ 89,463	-7.7%	\$ 80,259	\$ 80,259	3.4%	\$ -2,837	2	\$0	4	\$0	11	
Procurement Specialist	AE	\$ 70,678	\$ 74,078	-4.8%	\$ 69,519	\$ 69,519	1.6%	\$ -1,159	9	\$0	5	\$0	8	
Property Assessment Specialist I	AE	\$ 51,501	\$ 49,842	3.2%	\$ 52,185	\$ 52,657	-2.2%	\$ 1,156	3	\$3,469	15	\$17,344	3	Internal Alignment: 10% below Property Assessment Specialist II
Property Assessment Specialist II	AE	\$ 58,656	\$ 60,253	-2.7%	\$ 58,508	\$ 58,508	0.3%	\$ -148	51	\$0	38	\$0	8	
Property Assessment Specialist III	AE	\$ 70,450	\$ 68,983	2.1%	\$ 64,046	\$ 64,046	9.1%	\$ -6,403	11	\$0	11	\$0	5	
Protective Services Assistant	SW	\$ 45,968	\$ 48,582	-5.7%	\$ 48,837	\$ 48,837	-6.2%	\$ 2,869	1	\$2,869	1	\$2,869	6	
Protective Services Supervisor	SS	\$ 93,267	\$ 100,913	-8.2%	\$ 101,014	\$ 101,014	-8.3%	\$ 7,747	140	\$1,084,540	129	\$999,326	9	
Protective Services Worker	SW	\$ 75,379	\$ 81,078	-7.6%	\$ 75,909	\$ 75,909	-0.7%	\$ 529	631	\$334,061	557	\$294,884	11	
Psychiatric Clinical Nurse Specialist	RN	\$ 112,861	\$ 153,059	-35.6%	\$ 135,611	\$ 135,611	-20.2%	\$ 22,750	0	\$0	0	\$0	7	
Psychiatric Nurse	RN	\$ 98,384	\$ 106,274	-8.0%	\$ 106,856	\$ 106,856	-8.6%	\$ 8,472	109	\$923,426	104	\$881,067	12	
Psychiatric Resident	PR	\$ 185,058	\$ 282,852	-52.8%	\$ 248,970	\$ 224,412	-21.3%	\$ 39,354	0	\$0	0	\$0	3	Internal Alignment: 15% below Psychiatrist
Psychiatric Technician	HS	\$ 52,707	\$ 63,517	-20.5%	\$ 62,851	\$ 62,851	-19.2%	\$ 10,144	0	\$0	0	\$0	11	
Psychiatrist	PR	\$ 219,794	\$ 300,248	-36.6%	\$ 264,014	\$ 264,014	-20.1%	\$ 44,220	5	\$221,100	2	\$88,440	7	
Psychiatrist - Specialist	PR	\$ 229,590	\$ 323,461	-40.9%	\$ 300,016	\$ 300,016	-30.7%	\$ 70,426	7	\$492,982	5	\$352,130	5	
Public Assistance Investigator I	PS	\$ 71,968	\$ 88,816	-23.4%	\$ 74,336	\$ 79,660	-10.7%	\$ 7,692	0	\$0	8	\$61,536	3	Internal Alignment: 10% below Public Assistance Investigator II
Public Assistance Investigator II	PS	\$ 77,501	\$ 95,754	-23.6%	\$ 88,511	\$ 88,511	-14.2%	\$ 11,010	39	\$429,403	19	\$209,196	10	
Public Assistance Investigator Supervisor	MM	\$ 85,301	\$ 109,803	-28.7%	\$ 97,286	\$ 97,286	-14.1%	\$ 11,985	8	\$95,879	8	\$95,879	11	

County of San Diego
Appendix I: Results Summary
August 2021

Classification	Bargaining Unit	Top Annual Salary			Adjusted Top Annual Salary			Cost Difference (Median Annual)	# of Budgeted Positions per Class	Cost per Budgeted Positions	# of Incumbents per Class	Cost per Actual Incumbents	# of Matches	Alignment
		Top Annual Salary	Median of Comparators	% above or below	Median of Comparators	Recommended Salary	% above or below							
Public Assistance Investigator Trainee	PS	\$ 64,043	\$ 67,719	-5.7%	\$ 67,740	\$ 71,694	-11.9%	\$ 7,651	0	\$0	3	\$22,953	3	Internal Alignment: 10% below Public Assistance Investigator I
Public Defender Investigator I	PS	\$ 79,602	\$ 93,864	-17.9%	\$ 93,207	\$ 93,207	-17.1%	\$ 13,606	0	\$0	16	\$217,693	9	
Public Defender Investigator II	PS	\$ 85,675	\$ 113,152	-32.1%	\$ 101,516	\$ 101,516	-18.5%	\$ 15,841	35	\$554,445	34	\$538,603	11	
Public Defender Investigator III	PS	\$ 94,598	\$ 122,960	-30.0%	\$ 120,286	\$ 120,286	-27.2%	\$ 25,688	35	\$899,065	12	\$308,251	9	
Public Defender Investigator Tr	PS	\$ 62,504	\$ 60,785	2.7%	\$ 60,631	\$ 60,631	3.0%	\$ -1,874	0	\$0	5	\$0	6	
Public Health Microbiologist	PR	\$ 85,717	\$ 92,292	-7.7%	\$ 89,319	\$ 89,319	-4.2%	\$ 3,602	13	\$46,831	5	\$18,012	13	
Public Health Nurse	RN	\$ 94,682	\$ 104,749	-10.6%	\$ 104,614	\$ 104,614	-10.5%	\$ 9,933	125	\$1,241,573	110	\$1,092,584	13	
Public Health Nurse Supervisor	MM	\$ 111,675	\$ 126,595	-13.4%	\$ 128,463	\$ 128,463	-15.0%	\$ 16,788	33	\$553,994	33	\$553,994	12	
Public Health Nutrition Manager	MM	\$ 85,654	\$ 110,695	-29.2%	\$ 97,252	\$ 97,252	-13.5%	\$ 11,598	2	\$23,195	1	\$11,598	7	
Purchasing Clerk	AE	\$ 50,669	\$ 59,738	-17.9%	\$ 55,686	\$ 55,686	-9.9%	\$ 5,017	3	\$15,050	3	\$15,050	5	
Quality Assurance Specialist (Registered Nurse)	PR	\$ 102,710	\$ 131,309	-27.8%	\$ 118,222	\$ 118,222	-15.1%	\$ 15,512	23	\$356,769	14	\$217,164	4	
Radio Communications System Engineer	PR	\$ 110,365	\$ 127,317	-15.4%	\$ 109,770	\$ 109,770	0.5%	\$ -594	2	\$0	2	\$0	7	
Radiologic Technologist	HS	\$ 55,078	\$ 84,469	-53.4%	\$ 84,170	\$ 84,170	-52.8%	\$ 29,092	2	\$58,184	2	\$58,184	11	
Radiologist	PR	\$ 170,851	\$ 261,253	-52.9%	\$ 237,862	\$ 229,466	-34.3%	\$ 58,615	1	\$58,615	1	\$58,615	2	Internal Alignment: Anchor to Pediatrician
Recordable Documents Specialist I	PS	\$ 56,410	\$ 52,166	7.5%	\$ 48,765	\$ 48,765	13.6%	\$ -7,644	0	\$0	38	\$0	9	
Recordable Documents Specialist II	PS	\$ 64,854	\$ 59,355	8.5%	\$ 52,545	\$ 52,545	19.0%	\$ -12,309	81	\$0	45	\$0	12	
Recordable Documents Specialist III	MM	\$ 75,109	\$ 68,899	8.3%	\$ 69,067	\$ 69,067	8.0%	\$ -6,042	18	\$0	18	\$0	10	
Records Clerk	CL	\$ 43,202	\$ 60,147	-39.2%	\$ 52,943	\$ 45,025	-4.2%	\$ 1,823	86	\$156,816	77	\$140,405	2	Internal Alignment: Anchor to Admissions Clerk
Records Management Coordinator	MM	\$ 55,515	\$ 72,041	-29.8%	\$ 73,143	\$ 73,143	-31.8%	\$ 17,628	3	\$52,884	3	\$52,884	4	
Recreation Program Coordinator	PS	\$ 56,742	\$ 52,506	7.5%	\$ 53,503	\$ 53,503	5.7%	\$ -3,239	8	\$0	4	\$0	4	
Recreation Therapy Aide	HS	\$ 44,803	\$ 67,827	-51.4%	\$ 55,958	\$ 59,963	-33.8%	\$ 15,160	7	\$106,117	6	\$90,957	3	Internal Alignment: 20% below Recreation Therapist
Recreation Therapy Supervisor	MM	\$ 82,805	\$ 104,910	-26.7%	\$ 92,295	\$ 92,295	-11.5%	\$ 9,490	2	\$18,980	2	\$18,980	4	
Recreational Therapist	PR	\$ 68,786	\$ 80,952	-17.7%	\$ 74,953	\$ 74,953	-9.0%	\$ 6,168	11	\$67,846	7	\$43,175	7	
Recycling Specialist I	PR	\$ 67,018	\$ 63,050	5.9%	\$ 64,248	\$ 70,122	-4.6%	\$ 3,105	1	\$3,105	0	\$0	3	Internal Alignment: 10% below Recycling Specialist II
Recycling Specialist II	PR	\$ 79,560	\$ 76,461	3.9%	\$ 77,914	\$ 77,914	2.1%	\$ -1,646	8	\$0	6	\$0	5	
Registered Veterinary Technician	PS	\$ 57,387	\$ 67,781	-18.1%	\$ 66,863	\$ 66,863	-16.5%	\$ 9,476	6	\$56,854	5	\$47,378	9	
Residential Care Worker I	HS	\$ 43,867	\$ 38,342	12.6%	\$ 38,480	\$ 38,480	12.3%	\$ -5,387	0	\$0	2	\$0	4	
Residential Care Worker II	HS	\$ 47,258	\$ 44,627	5.6%	\$ 44,764	\$ 44,764	5.3%	\$ -2,494	77	\$0	76	\$0	4	
Residential Care Worker Supervisor	MM	\$ 56,555	\$ 53,064	6.2%	\$ 53,701	\$ 61,775	-9.2%	\$ 5,220	27	\$140,936	20	\$104,397	1	Internal Alignment: 20% above Residential Childcare Specialist
Residential Care Worker Trainee	HS	\$ 39,790				\$ 34,632	13.0%	\$ -5,158	0	\$0	0	\$0	0	Internal Alignment: 10% below Residential Care Worker I
Residential Childcare Specialist	HS	\$ 51,106	\$ 86,091	-68.5%	\$ 71,628	\$ 51,479	-0.7%	\$ 373	9	\$3,361	9	\$3,361	1	Internal Alignment: 15% above Residential Care Worker II
Revenue & Recovery Officer	PS	\$ 62,878	\$ 59,925	4.7%	\$ 61,063	\$ 61,063	2.9%	\$ -1,815	26	\$0	23	\$0	11	
Revenue & Recovery Officer Trainee	PS	\$ 45,760	\$ 53,329	-16.5%	\$ 50,629	\$ 50,629	-10.6%	\$ 4,869	1	\$4,869	1	\$4,869	8	
Road Crew Supervisor	MM	\$ 81,266	\$ 94,765	-16.6%	\$ 88,349	\$ 88,349	-8.7%	\$ 7,083	20	\$141,659	18	\$127,493	13	
Sanitation Regional Supervisor	MM	\$ 90,979	\$ 78,416	13.8%	\$ 79,906	\$ 79,906	12.2%	\$ -11,073	3	\$0	2	\$0	5	
Section Chief, Revenue & Recovery	MM	\$ 89,731	\$ 105,080	-17.1%	\$ 94,061	\$ 94,061	-4.8%	\$ 4,329	5	\$21,647	5	\$21,647	7	
Senior Account Clerk	MM	\$ 50,024	\$ 62,232	-24.4%	\$ 59,126	\$ 59,126	-18.2%	\$ 9,102	7	\$63,715	4	\$36,409	11	
Senior Accountant	MM	\$ 91,354	\$ 91,053	0.3%	\$ 87,171	\$ 87,171	4.6%	\$ -4,183	47	\$0	42	\$0	13	
Senior Admissions Clerk	CL	\$ 52,333	\$ 53,082	-1.4%	\$ 54,090	\$ 54,030	-3.2%	\$ 1,697	2	\$3,394	1	\$1,697	3	Internal Alignment: 20% above Admissions Clerk
Senior Adult Protective Services Specialist	PS	\$ 80,704	\$ 89,419	-10.8%	\$ 90,187	\$ 90,187	-11.8%	\$ 9,483	13	\$123,279	10	\$94,830	5	
Senior Agricultural/Standards Inspector	PR	\$ 82,659	\$ 79,302	4.1%	\$ 73,102	\$ 73,102	11.6%	\$ -9,557	67	\$0	35	\$0	11	
Senior Air Pollution Chemist*	MM	\$ 113,464	\$ 127,455	-12.3%	\$ 114,886	\$ 133,937	-18.0%	\$ 20,473	3	\$61,420	3	\$61,420	2	Internal Alignment: 15% above Associate Air Pollution Chemist
Senior Air Pollution Control Engineer*	PR	\$ 118,706	\$ 116,793	1.6%	\$ 116,769	\$ 116,769	1.6%	\$ -1,936	5	\$0	4	\$0	4	
Senior Airport Technician	MM	\$ 79,518	\$ 87,597	-10.2%	\$ 80,561	\$ 80,561	-1.3%	\$ 1,043	2	\$2,086	2	\$2,086	6	
Senior Animal Services Representative	CL	\$ 52,874	\$ 62,779	-18.7%	\$ 56,428	\$ 58,717	-11.1%	\$ 5,843	2	\$11,686	2	\$11,686	2	Internal Alignment: 15% above Animal Services Representative

County of San Diego
Appendix I: Results Summary
August 2021

	Bargaining	Top Annual Salary			Adjusted Top Annual Salary			Cost Difference	# of Budgeted	Cost per	# of	Cost per Actual	# of	
Senior Assessment Clerk	CL	\$ 49,670	\$ 67,157	-35.2%	\$ 63,713	\$ 63,713	-28.3%	\$ 14,042	7	\$98,297	5	\$70,212	5	
Senior Cadastral Technician	AE	\$ 72,946	\$ 79,730	-9.3%	\$ 71,160	\$ 71,160	2.4%	\$ -1,786	4	\$0	3	\$0	10	
Senior Cashier	MM	\$ 49,941	\$ 78,969	-58.1%	\$ 65,702	\$ 57,852	-15.8%	\$ 7,911	1	\$7,911	0	\$0	3	Internal Alignment: 15% above Cashier
Senior Civil Engineer	MM	\$ 129,605	\$ 144,401	-11.4%	\$ 137,846	\$ 137,846	-6.4%	\$ 8,241	31	\$255,467	29	\$238,985	12	
Senior Clinical Psychologist	PR	\$ 104,998	\$ 115,749	-10.2%	\$ 110,549	\$ 110,549	-5.3%	\$ 5,551	20	\$111,011	14	\$77,708	8	
Senior Communicable Disease Investigator	PS	\$ 75,670	\$ 76,274	-0.8%	\$ 73,136	\$ 73,136	3.3%	\$ -2,535	6	\$0	6	\$0	7	
Senior Construction Inspector	MM	\$ 87,256	\$ 99,515	-14.0%	\$ 93,957	\$ 93,957	-7.7%	\$ 6,701	1	\$6,701	1	\$6,701	12	
Senior Cook	FS	\$ 48,298	\$ 60,472	-25.2%	\$ 55,887	\$ 55,887	-15.7%	\$ 7,589	68	\$516,058	58	\$440,167	11	
Senior Electronic Security & Systems Technician	MM	\$ 83,429	\$ 96,871	-16.1%	\$ 91,447	\$ 91,447	-9.6%	\$ 8,018	1	\$8,018	1	\$8,018	4	
Senior Emergency Services Coordinator	MM	\$ 101,130	\$ 107,493	-6.3%	\$ 98,739	\$ 98,739	2.4%	\$ -2,390	5	\$0	3	\$0	8	
Senior Epidemiologist	PR	\$ 114,504	\$ 111,016	3.0%	\$ 100,230	\$ 100,230	12.5%	\$ -14,274	12	\$0	7	\$0	7	
Senior Forensic Evidence Technician	PS	\$ 86,507	\$ 95,711	-10.6%	\$ 95,525	\$ 95,525	-10.4%	\$ 9,018	1	\$9,018	1	\$9,018	4	
Senior Geographic Information Systems Analyst	PR	\$ 94,994	\$ 119,403	-25.7%	\$ 114,866	\$ 114,866	-20.9%	\$ 19,872	11	\$218,597	10	\$198,725	5	
Senior Health Information Management Technician	HS	\$ 52,978	\$ 62,064	-17.2%	\$ 58,068	\$ 64,118	-21.0%	\$ 11,141	9	\$100,265	8	\$89,124	2	Internal Alignment: 15% above Health Information Management Technician
Senior Health Physicist	MM	\$ 118,934	\$ 161,700	-36.0%	\$ 155,555	\$ 119,180	-0.2%	\$ 246	1	\$246	1	\$246	1	Internal Alignment: 20% above Associate Health Physicist
Senior HHS Contract Auditor	MM	\$ 96,179	\$ 100,462	-4.5%	\$ 98,519	\$ 98,519	-2.4%	\$ 2,340	4	\$9,361	4	\$9,361	4	
Senior Histology Technician	HS	\$ 69,326	\$ 102,988	-48.6%	\$ 90,679	\$ 80,483	-16.1%	\$ 11,157	0	\$0	0	\$0	2	Internal Alignment: 15% above Histology Technician
Senior Hydrogeologist	PR	\$ 114,317	\$ 100,859	11.8%	\$ 103,832	\$ 106,673	6.7%	\$ -7,644	2	\$0	1	\$0	2	Internal Alignment: Anchor to Groundwater Geologist
Senior Insect Detection Specialist	PS	\$ 57,886	\$ 92,468	-59.7%	\$ 76,340	\$ 70,374	-21.6%	\$ 12,488	6	\$74,925	6	\$74,925	2	Internal Alignment: 20% above Insect Detection Specialist II
Senior Laboratory Assistant	HS	\$ 50,710	\$ 56,410	-11.2%	\$ 55,281	\$ 55,281	-9.0%	\$ 4,571	5	\$22,855	3	\$13,713	5	
Senior Land Surveyor	MM	\$ 129,605	\$ 127,448	1.7%	\$ 121,589	\$ 121,589	6.2%	\$ -8,016	4	\$0	4	\$0	10	
Senior Latent Print Examiner	PS	\$ 119,538	\$ 120,696	-1.0%	\$ 104,341	\$ 101,558	15.0%	\$ -17,980	2	\$0	2	\$0	3	Internal Alignment: 15% above Latent Print Examiner
Senior Laundry Worker	MM	\$ 47,632	\$ 43,394	8.9%	\$ 45,434	\$ 45,434	4.6%	\$ -2,198	3	\$0	3	\$0	5	
Senior Litigation Investigator	PS	\$ 107,640	\$ 144,352	-34.1%	\$ 119,235	\$ 121,399	-12.8%	\$ 13,759	4	\$55,036	4	\$55,036	1	Internal Alignment: 10% above Litigation Investigator
Senior Mail Carrier	PS	\$ 48,090	\$ 51,376	-6.8%	\$ 52,352	\$ 51,657	-7.4%	\$ 3,567	1	\$3,567	1	\$3,567	3	Internal Alignment: 15% above Mail Carrier
Senior Medical Transcriber	CL	\$ 55,869	\$ 69,107	-23.7%	\$ 61,526	\$ 60,311	-8.0%	\$ 4,442	1	\$4,442	1	\$4,442	2	Internal Alignment: 10% above Medical Transcriber
Senior Meteorologist	PR	\$ 114,442	\$ 117,060	-2.3%	\$ 113,782	\$ 115,613	-1.0%	\$ 1,171	1	\$1,171	1	\$1,171	1	Internal Alignment: 15% above Associate Meteorologist
Senior Occupational/Physical Therapist	PR	\$ 100,922	\$ 112,216	-11.2%	\$ 108,016	\$ 108,016	-7.0%	\$ 7,094	23	\$163,169	19	\$134,792	9	
Senior Office Assistant	MM	\$ 48,651	\$ 55,973	-15.1%	\$ 55,995	\$ 55,995	-15.1%	\$ 7,344	127	\$932,651	118	\$866,557	10	
Senior Park Ranger	MM	\$ 62,608	\$ 64,501	-3.0%	\$ 65,726	\$ 65,726	-5.0%	\$ 3,118	15	\$46,776	17	\$53,013	7	
Senior Payroll Clerk	CL	\$ 50,731	\$ 83,605	-64.8%	\$ 73,993	\$ 70,479	-38.9%	\$ 19,748	0	\$0	0	\$0	2	Internal Alignment: 20% above Payroll Clerk
Senior Precinct Planning Technician	PS	\$ 59,405	\$ 69,432	-16.9%	\$ 61,725	\$ 68,587	-15.5%	\$ 9,182	2	\$18,364	2	\$18,364	1	Internal Alignment: 10% above Precinct Planning Technician
Senior Procurement Contracting Officer	PR	\$ 115,357	\$ 109,293	5.3%	\$ 104,170	\$ 104,170	9.7%	\$ -11,187	7	\$0	6	\$0	8	
Senior Protective Services Worker	SW	\$ 80,662	\$ 89,419	-10.9%	\$ 90,187	\$ 90,187	-11.8%	\$ 9,525	161	\$1,533,447	145	\$1,381,054	7	
Senior Public Health Microbiologist	PR	\$ 94,349	\$ 108,574	-15.1%	\$ 96,522	\$ 96,522	-2.3%	\$ 2,173	10	\$21,735	5	\$10,867	9	
Senior Public Health Nurse	RN	\$ 99,674	\$ 112,042	-12.4%	\$ 112,154	\$ 112,154	-12.5%	\$ 12,480	63	\$786,268	52	\$648,983	7	
Senior Real Property Agent	PR	\$ 94,328	\$ 108,874	-15.4%	\$ 96,789	\$ 96,789	-2.6%	\$ 2,461	12	\$29,530	10	\$24,608	9	
Senior Revenue & Recovery Officer	PS	\$ 69,368	\$ 82,732	-19.3%	\$ 73,549	\$ 73,549	-6.0%	\$ 4,181	10	\$41,806	9	\$37,625	9	
Senior Storekeeper	MM	\$ 56,306	\$ 63,039	-12.0%	\$ 61,502	\$ 61,502	-9.2%	\$ 5,196	9	\$46,767	9	\$46,767	12	
Senior Structural Engineer	MM	\$ 135,720	\$ 138,601	-2.1%	\$ 137,093	\$ 137,093	-1.0%	\$ 1,373	0	\$0	0	\$0	9	
Senior Tax Payment Enforcement Officer	PS	\$ 79,165	\$ 85,150	-7.6%	\$ 80,551	\$ 80,551	-1.8%	\$ 1,387	1	\$1,387	1	\$1,387	6	
Senior Tax Payment Processor	CL	\$ 53,747	\$ 47,784	11.1%	\$ 48,357	\$ 54,217	-0.9%	\$ 470	0	\$0	0	\$0	1	Internal Alignment: 10% above Tax Payment Processor
Senior Treasurer-Tax Collector Specialist	CL	\$ 53,456	\$ 67,322	-25.9%	\$ 61,289	\$ 61,289	-14.7%	\$ 7,833	28	\$219,323	27	\$211,490	4	
Senior Vector Control Technician	PS	\$ 67,954	\$ 74,268	-9.3%	\$ 70,091	\$ 70,091	-3.1%	\$ 2,137	9	\$19,236	8	\$17,099	4	
Senior Vector Ecologist	PR	\$ 100,298	\$ 106,386	-6.1%	\$ 91,220	\$ 107,636	-7.3%	\$ 7,339	2	\$14,677	1	\$7,339	2	Internal Alignment: Anchor to Industrial Hygienist III

County of San Diego
Appendix I: Results Summary
August 2021

	Bargaining	Top Annual Salary			Adjusted Top Annual Salary			Cost Difference	# of Budgeted	Cost per	# of	Cost per Actual	# of	
	MM	\$ 73,861	\$ 73,747		\$ 73,033	\$ 73,033		\$ -828	2	\$0	2	\$0	6	
Sewing Room Supervisor	MM	\$ 38,397	\$ 54,382	-41.6%	\$ 52,315	\$ 45,434	-18.3%	\$ 7,037	1	\$7,037	1	\$7,037	1	Internal Alignment: Anchor to Senior Laundry Worker
Sheriff's Commissary Stores Supervisor	MM	\$ 62,130				\$ 70,727	-13.8%	\$ 8,597	1	\$8,597	1	\$8,597	0	Internal Alignment: 15% above Senior Storekeeper
Sheriff's Communications Dispatcher	PS	\$ 50,232	\$ 55,016	-9.5%	\$ 56,061	\$ 56,061	-11.6%	\$ 5,829	2	\$11,659	3	\$17,488	5	
Sheriff's Detentions Licensed Vocational Nurse	HS	\$ 60,507	\$ 56,025	7.4%	\$ 57,745	\$ 57,745	4.6%	\$ -2,763	97	\$0	46	\$0	8	
Sheriff's Detentions Nurse	RN	\$ 113,360	\$ 111,949	1.2%	\$ 114,076	\$ 114,076	-0.6%	\$ 716	239	\$171,112	168	\$120,280	8	
Sheriff's Detentions Supervising Nurse	MM	\$ 133,786	\$ 129,690	3.1%	\$ 132,140	\$ 132,140	1.2%	\$ -1,646	26	\$0	7	\$0	4	
Sheriff's Detentions, Chief Mental Health Clinician	MM	\$ 105,997	\$ 106,214	-0.2%	\$ 108,232	\$ 113,712	-7.3%	\$ 7,715	5	\$38,576	2	\$15,430	1	Internal Alignment: 20% above Sheriff's Detentions, Mental Health Clinician
Sheriff's Detentions, Mental Health Clinician	PR	\$ 99,008	\$ 98,758	0.3%	\$ 94,760	\$ 94,760	4.3%	\$ -4,248	75	\$0	22	\$0	5	
Sheriff's Detentions, Processing Assistant Manager	MM	\$ 84,698				\$ 79,889	5.7%	\$ -4,809	1	\$0	1	\$0	0	Internal Alignment: 15% above Sheriff's Operations Supervisor
Sheriff's Emergency Services Dispatcher	PS	\$ 76,960	\$ 87,988	-14.3%	\$ 85,633	\$ 85,633	-11.3%	\$ 8,673	127	\$1,101,495	92	\$797,933	13	
Sheriff's Emergency Services Dispatcher Trainee	PS	\$ 47,112	\$ 75,858	-61.0%	\$ 70,255	\$ 70,255	-49.1%	\$ 23,143	0	\$0	27	\$624,859	12	
Sheriff's Fingerprint Examiner	PS	\$ 53,539	\$ 82,763	-54.6%	\$ 75,497	\$ 75,497	-41.0%	\$ 21,958	9	\$197,623	8	\$175,665	9	
Sheriff's Investigative Specialist	PS	\$ 61,339	\$ 65,936	-7.5%	\$ 64,617	\$ 53,521	12.7%	\$ -7,818	0	\$0	0	\$0	3	Internal Alignment: Anchor to Investigative Specialist
Sheriff's Licensing Clerk I	CL	\$ 43,160	\$ 56,201	-30.2%	\$ 54,603	\$ 43,999	-1.9%	\$ 839	0	\$0	7	\$5,874	2	Internal Alignment: 10% below Sheriff's Licensing Clerk II
Sheriff's Licensing Clerk II	CL	\$ 48,714	\$ 65,453	-34.4%	\$ 57,456	\$ 48,888	-0.4%	\$ 174	10	\$1,744	2	\$349	3	Internal Alignment: 10% below Sheriff's Licensing Specialist
Sheriff's Licensing Specialist	CL	\$ 52,686	\$ 87,381	-65.9%	\$ 85,633	\$ 54,320	-3.1%	\$ 1,634	4	\$6,535	2	\$3,267	1	Internal Alignment: 20% below Sheriff's Licensing Supervisor
Sheriff's Licensing Supervisor	MM	\$ 54,538	\$ 72,213	-32.4%	\$ 69,469	\$ 67,900	-24.5%	\$ 13,362	3	\$40,087	3	\$40,087	1	Internal Alignment: 15% below Sheriff's Operations Supervisor
Sheriff's Operations Supervisor	MM	\$ 73,445	\$ 72,213	1.7%	\$ 69,469	\$ 79,882	-8.8%	\$ 6,437	7	\$45,060	6	\$38,623	1	Internal Alignment: 15% above Detentions Processing Supervisor
Sheriff's Property & Evidence Custodian	PS	\$ 59,072	\$ 87,462	-48.1%	\$ 72,156	\$ 72,779	-23.2%	\$ 13,707	3	\$41,121	2	\$27,414	1	Internal Alignment: 15% above Sheriff's Property & Evidence Specialist II
Sheriff's Property & Evidence Manager	MM	\$ 73,382	\$ 98,380	-34.1%	\$ 87,460	\$ 86,588	-18.0%	\$ 13,205	1	\$13,205	1	\$13,205	3	Internal Alignment: 20% above Sheriff's Property & Evidence Custodian
Sheriff's Property & Evidence Specialist I	CL	\$ 43,014	\$ 62,100	-44.4%	\$ 59,093	\$ 59,093	-37.4%	\$ 16,079	6	\$96,472	9	\$144,708	4	
Sheriff's Property & Evidence Specialist II	CL	\$ 49,504	\$ 69,971	-41.3%	\$ 63,286	\$ 63,286	-27.8%	\$ 13,782	14	\$192,952	0	\$0	7	
Sheriff's Property Investigator	PS	\$ 55,661				\$ 65,498	-17.7%	\$ 9,837	4	\$39,349	3	\$29,512	0	Internal Alignment: 10% below Deputy Public Administrator-Guardian
Sheriff's Range Guard	PS	\$ 45,947	\$ 53,120	-15.6%	\$ 54,129	\$ 67,886	-47.7%	\$ 21,939	5	\$109,694	3	\$65,817	1	Internal Alignment: Anchor to Deputy Sheriff Cadet-Detention/Court Services
Sheriff's Records & Identification Clerk I	CL	\$ 43,160	\$ 49,166	-13.9%	\$ 49,840	\$ 49,840	-15.5%	\$ 6,680	0	\$0	1	\$6,680	9	
Sheriff's Records & Identification Clerk II	CL	\$ 48,714	\$ 55,345	-13.6%	\$ 56,420	\$ 56,420	-15.8%	\$ 7,706	67	\$516,334	55	\$423,856	9	
Sheriff's Records & Identification Supervisor	MM	\$ 55,411	\$ 67,836	-22.4%	\$ 67,273	\$ 67,273	-21.4%	\$ 11,862	11	\$130,484	10	\$118,622	7	
Sheriff's Senior Fingerprint Examiner	PS	\$ 63,648	\$ 97,977	-53.9%	\$ 89,478	\$ 89,478	-40.6%	\$ 25,830	2	\$51,660	1	\$25,830	8	
Sheriff's Supervisor Helicopter/Airplane Mechanic	MM	\$ 104,187	\$ 93,038	10.7%	\$ 92,905	\$ 92,905	10.8%	\$ -11,282	1	\$0	1	\$0	4	
Social Services Aide	SW	\$ 41,850	\$ 51,362	-22.7%	\$ 50,369	\$ 50,369	-20.4%	\$ 8,519	20	\$170,385	20	\$170,385	9	
Social Work Supervisor	SS	\$ 78,146	\$ 96,342	-23.3%	\$ 89,419	\$ 89,419	-14.4%	\$ 11,274	25	\$281,845	25	\$281,845	12	
Social Worker I	SW	\$ 54,662	\$ 66,731	-22.1%	\$ 64,195	\$ 64,195	-17.4%	\$ 9,533	38	\$362,249	33	\$314,584	11	
Social Worker II	SW	\$ 57,491	\$ 76,394	-32.9%	\$ 72,091	\$ 72,091	-25.4%	\$ 14,599	17	\$248,190	14	\$204,391	12	
Social Worker III	SW	\$ 66,539	\$ 92,088	-38.4%	\$ 85,024	\$ 85,024	-27.8%	\$ 18,485	225	\$4,159,166	202	\$3,734,007	11	
Solid Waste Site Supervisor	MM	\$ 81,266	\$ 71,710	11.8%	\$ 73,072	\$ 73,072	10.1%	\$ -8,193	1	\$0	1	\$0	3	Above Market N/A
Staff Accountant	AE	\$ 67,350	\$ 74,498	-10.6%	\$ 67,154	\$ 67,154	0.3%	\$ -196	24	\$0	45	\$0	13	
Staff Nurse	RN	\$ 89,606	\$ 103,076	-15.0%	\$ 103,920	\$ 103,920	-16.0%	\$ 14,314	46	\$658,427	47	\$672,740	13	
Statistician	PR	\$ 81,890	\$ 88,291	-7.8%	\$ 84,730	\$ 84,730	-3.5%	\$ 2,840	0	\$0	0	\$0	6	
Stock Clerk	AE	\$ 38,834	\$ 48,952	-26.1%	\$ 46,547	\$ 46,547	-19.9%	\$ 7,713	56	\$431,925	47	\$362,508	13	
Storekeeper	AE	\$ 44,054	\$ 58,543	-32.9%	\$ 54,392	\$ 54,392	-23.5%	\$ 10,338	19	\$196,418	16	\$165,405	12	
Storekeeper II (T)	MM	\$ 48,693	\$ 61,906	-27.1%	\$ 55,254	\$ 55,254	-13.5%	\$ 6,561	1	\$6,561	1	\$6,561	8	
Substance Abuse Assessor	PR	\$ 76,378	\$ 89,130	-16.7%	\$ 79,237	\$ 72,018	5.7%	\$ -4,360	4	\$0	4	\$0	1	Internal Alignment: Anchor to Correctional Counselor
Supervising Agricultural/Standards Inspector	MM	\$ 96,990	\$ 88,038	9.2%	\$ 87,422	\$ 87,422	9.9%	\$ -9,568	14	\$0	13	\$0	9	
Supervising Air Quality Inspector*	PS	\$ 104,104	\$ 126,339	-21.4%	\$ 104,356	\$ 102,677	1.4%	\$ -1,427	7	\$0	5	\$0	3	Internal Alignment: 20% above Air Quality Inspector II

County of San Diego
Appendix I: Results Summary
August 2021

Classification	Bargaining Unit	Top Annual Salary			Adjusted Top Annual Salary			Cost Difference (Median Annual)	# of Budgeted Positions per Class	Cost per Budgeted Positions	# of Incumbents per Class	Cost per Actual Incumbents	# of Matches	Alignment
		Top Annual Salary	Median of Comparators	% above or below	Median of Comparators	Recommended Salary	% above or below							
Supervising Air Resources Specialist*	MM	\$ 120,037	\$ 136,655	-13.8%	\$ 127,942	\$ 123,072	-2.5%	\$ 3,035	2	\$6,070	2	\$6,070	3	Internal Alignment: 20% above Associate Air Resources Specialist
Supervising Animal Care Attendant	MM	\$ 60,653	\$ 67,259	-10.9%	\$ 64,020	\$ 64,020	-5.6%	\$ 3,367	4	\$13,468	4	\$13,468	5	
Supervising Animal Control Officer	MM	\$ 71,053	\$ 82,599	-16.3%	\$ 79,364	\$ 79,364	-11.7%	\$ 8,311	4	\$33,244	4	\$33,244	8	
Supervising Appraiser I	MM	\$ 109,907	\$ 110,417	-0.5%	\$ 104,841	\$ 104,841	4.6%	\$ -5,066	10	\$0	11	\$0	8	
Supervising Appraiser II	MM	\$ 120,952	\$ 109,613	9.4%	\$ 108,266	\$ 108,266	10.5%	\$ -12,686	4	\$0	4	\$0	10	
Supervising Assessment Clerk	MM	\$ 58,490	\$ 75,069	-28.3%	\$ 74,085	\$ 74,085	-26.7%	\$ 15,595	4	\$62,382	4	\$62,382	6	
Supervising Audit-Appraiser	MM	\$ 120,952	\$ 114,161	5.6%	\$ 109,079	\$ 109,079	9.8%	\$ -11,873	3	\$0	3	\$0	12	
Supervising Child Support Officer	MM	\$ 77,522	\$ 83,606	-7.8%	\$ 81,947	\$ 81,947	-5.7%	\$ 4,425	24	\$106,206	17	\$75,229	13	
Supervising Communicable Disease Investigator	MM	\$ 84,032	\$ 82,805	1.5%	\$ 73,675	\$ 73,675	12.3%	\$ -10,357	4	\$0	4	\$0	5	
Supervising Community Health Promotion Specialist	MM	\$ 84,219	\$ 96,209	-14.2%	\$ 86,979	\$ 86,979	-3.3%	\$ 2,760	1	\$2,760	1	\$2,760	6	
Supervising Correctional Counselor	MM	\$ 91,978	\$ 123,124	-33.9%	\$ 111,401	\$ 90,022	2.1%	\$ -1,956	6	\$0	4	\$0	2	Internal Alignment: 5% below Sheriff's Detentions, Mental Health Clinician
Supervising Criminalist	MM	\$ 141,232	\$ 139,249	1.4%	\$ 132,851	\$ 132,851	5.9%	\$ -8,380	6	\$0	5	\$0	11	
Supervising Deputy Public Administrator-Guardian	MM	\$ 79,810	\$ 87,163	-9.2%	\$ 86,990	\$ 86,990	-9.0%	\$ 7,181	2	\$14,362	2	\$14,362	10	
Supervising Electronic Instrument Technician	MM	\$ 87,506	\$ 116,491	-33.1%	\$ 104,007	\$ 104,007	-18.9%	\$ 16,501	2	\$33,002	2	\$33,002	4	
Supervising Environmental Health Specialist	MM	\$ 100,859	\$ 110,892	-9.9%	\$ 106,678	\$ 106,678	-5.8%	\$ 5,819	25	\$145,474	22	\$128,017	13	
Supervising Health Information Specialist	MM	\$ 84,219	\$ 80,346	4.6%	\$ 81,873	\$ 81,873	2.8%	\$ -2,346	2	\$0	1	\$0	4	
Supervising Human Services Control Specialist	SS	\$ 70,970	\$ 104,148	-46.7%	\$ 89,276	\$ 89,276	-25.8%	\$ 18,306	6	\$109,837	6	\$109,837	4	
Supervising Human Services Specialist	SS	\$ 67,642	\$ 88,220	-30.4%	\$ 83,156	\$ 83,156	-22.9%	\$ 15,515	226	\$3,506,348	220	\$3,413,259	10	
Supervising Industrial Hygienist	MM	\$ 106,142	\$ 130,853	-23.3%	\$ 115,936	\$ 115,936	-9.2%	\$ 9,793	1	\$9,793	1	\$9,793	5	
Supervising Nurse	MM	\$ 107,806	\$ 119,374	-10.7%	\$ 123,340	\$ 123,340	-14.4%	\$ 15,534	28	\$434,938	20	\$310,670	8	
Supervising Occupational/Physical Therapist	MM	\$ 108,805	\$ 120,402	-10.7%	\$ 118,153	\$ 118,153	-8.6%	\$ 9,348	11	\$102,825	11	\$102,825	10	
Supervising Office Assistant	MM	\$ 55,515	\$ 73,827	-33.0%	\$ 69,290	\$ 69,290	-24.8%	\$ 13,775	47	\$647,434	43	\$592,333	6	
Supervising Park Ranger	MM	\$ 68,411	\$ 79,465	-16.2%	\$ 79,073	\$ 79,073	-15.6%	\$ 10,662	23	\$245,226	19	\$202,578	8	
Supervising Pest Management Technician	MM	\$ 74,901	\$ 83,162	-11.0%	\$ 76,287	\$ 76,287	-1.9%	\$ 1,387	1	\$1,387	1	\$1,387	4	
Supervising Public Health Microbiologist	MM	\$ 104,083	\$ 107,276	-3.1%	\$ 103,504	\$ 103,504	0.6%	\$ -579	7	\$0	6	\$0	12	
Supervising Sheriff's Emergency Services Dispatcher	MM	\$ 96,699	\$ 108,256	-12.0%	\$ 97,214	\$ 97,214	-0.5%	\$ 515	15	\$7,719	15	\$7,719	12	
Supervising Stores & Mail System Specialist, Auditor & Controller	MM	\$ 60,944	\$ 46,989	22.9%	\$ 47,030	\$ 55,178	9.5%	\$ -5,766	1	\$0	1	\$0	2	Internal Alignment: 20% above Mail Processor
Supervising Treasurer-Tax Collector Specialist	MM	\$ 60,320	\$ 87,612	-45.2%	\$ 75,520	\$ 75,520	-25.2%	\$ 15,200	6	\$91,198	6	\$91,198	5	
Supervising Vector Ecologist	MM	\$ 107,390	\$ 112,389	-4.7%	\$ 96,324	\$ 108,382	-0.9%	\$ 992	1	\$992	1	\$992	2	Internal Alignment: 15% above the Senior Vector Ecologist
Supervising, Trial Support Unit	MM	\$ 96,138	\$ 96,069	0.1%	\$ 96,165	\$ 91,349	5.0%	\$ -4,789	1	\$0	0	\$0	1	Internal Alignment: 20% above Trial Support Specialist
Supervising, Vector Control Technician	MM	\$ 74,901	\$ 86,982	-16.1%	\$ 88,635	\$ 80,316	-7.2%	\$ 5,415	5	\$27,076	5	\$27,076	2	Internal Alignment: 20% above Vector Control Technician
Tax Payment Enforcement Officer	PS	\$ 64,834	\$ 76,358	-17.8%	\$ 66,986	\$ 66,986	-3.3%	\$ 2,152	1	\$2,152	1	\$2,152	8	
Tax Payment Processor	CL	\$ 48,693	\$ 49,747	-2.2%	\$ 49,288	\$ 49,288	-1.2%	\$ 595	0	\$0	0	\$0	4	
Technical Writer	PR	\$ 89,918	\$ 116,102	-29.1%	\$ 104,076	\$ 104,076	-15.7%	\$ 14,157	1	\$14,157	1	\$14,157	2	Internal Alignment: No alignment found
Telecommunications Technician III	MM	\$ 90,126	\$ 101,826	-13.0%	\$ 91,262	\$ 91,262	-1.3%	\$ 1,135	8	\$9,083	8	\$9,083	7	
Telecommunications Technician IV	MM	\$ 99,050	\$ 102,375	-3.4%	\$ 102,477	\$ 102,477	-3.5%	\$ 3,428	2	\$6,856	3	\$10,283	7	
Toxicologist I	PR	\$ 82,014	\$ 98,271	-19.8%	\$ 83,889	\$ 87,322	-6.5%	\$ 5,308	0	\$0	0	\$0	2	Internal Alignment: 15% below Toxicologist II
Toxicologist II	PR	\$ 100,152	\$ 120,426	-20.2%	\$ 102,732	\$ 102,732	-2.6%	\$ 2,580	4	\$10,320	4	\$10,320	4	
Toxicologist III	MM	\$ 114,234	\$ 122,328	-7.1%	\$ 108,750	\$ 118,142	-3.4%	\$ 3,908	1	\$3,908	1	\$3,908	3	Internal Alignment: 15% above Toxicologist II
Treasurer-Tax Collector Specialist	CL	\$ 46,571	\$ 64,908	-39.4%	\$ 54,004	\$ 54,004	-16.0%	\$ 7,433	33	\$245,279	30	\$222,981	5	
Trial Support Specialist	PS	\$ 91,562	\$ 83,394	8.9%	\$ 76,124	\$ 76,124	16.9%	\$ -15,438	11	\$0	8	\$0	4	
Utilization Review Quality Improvement Specialist	PR	\$ 99,466	\$ 140,588	-41.3%	\$ 119,662	\$ 119,662	-20.3%	\$ 20,196	24	\$484,705	20	\$403,921	6	
Utilization Review Quality Improvement Supervisor	MM	\$ 104,437	\$ 147,346	-41.1%	\$ 125,672	\$ 125,672	-20.3%	\$ 21,235	5	\$106,174	4	\$84,940	4	
Vector Control Technician	PS	\$ 61,755	\$ 67,402	-9.1%	\$ 66,930	\$ 66,930	-8.4%	\$ 5,175	17	\$87,967	16	\$82,793	5	
Vector Control Technician Aide	PS	\$ 43,118	\$ 57,710	-33.8%	\$ 57,559	\$ 57,559	-33.5%	\$ 14,440	0	\$0	0	\$0	5	

County of San Diego
Appendix I: Results Summary
August 2021

Classification	Bargaining Unit	Top Annual Salary			Adjusted Top Annual Salary			Cost Difference (Median Annual)	# of Budgeted Positions per Class	Cost per Budgeted Positions	# of Incumbents per Class	Cost per Actual Incumbents	# of Matches	Alignment
		Top Annual Salary	Median of Comparators	% above or below	Median of Comparators	Recommended Salary	% above or below							
Vector Ecologist	PR	\$ 95,493	\$ 96,262	-0.8%	\$ 93,618	\$ 97,851	-2.5%	\$ 2,358	1	\$2,358	2	\$4,716	3	Internal Alignment: Anchor to Industrial Hygienist II
Veterans Services Representative	PS	\$ 65,957	\$ 66,566	-0.9%	\$ 64,256	\$ 64,256	2.6%	\$ -1,700	11	\$0	10	\$0	13	
Veterinarian	PR	\$ 124,051	\$ 138,300	-11.5%	\$ 136,253	\$ 136,253	-9.8%	\$ 12,201	2	\$24,403	1	\$12,201	9	
Victim Advocate	PR	\$ 71,635	\$ 59,025	17.6%	\$ 56,680	\$ 56,680	20.9%	\$ -14,956	13	\$0	17	\$0	10	
Victim/Witness Assist Program Manager	MM	\$ 87,901	\$ 115,850	-31.8%	\$ 105,254	\$ 105,254	-19.7%	\$ 17,353	2	\$34,706	1	\$17,353	7	
Victim/Witness Assistance Program Supervisor	MM	\$ 80,413	\$ 80,309	0.1%	\$ 77,390	\$ 77,390	3.8%	\$ -3,023	7	\$0	3	\$0	9	
Wastewater Facilities Supervisor	MM	\$ 95,451	\$ 103,111	-8.0%	\$ 103,694	\$ 103,694	-8.6%	\$ 8,242	2	\$16,485	1	\$8,242	6	
Wastewater Plant Operator III	MM	\$ 82,618	\$ 85,722	-3.8%	\$ 89,128	\$ 89,128	-7.9%	\$ 6,510	5	\$32,550	4	\$26,040	5	
Watershed Manager	MM	\$ 95,805				\$ 98,841	-3.2%	\$ 3,036	0	\$0	0	\$0	0	Internal Alignment: 25% above Supervising Park Ranger

AVERAGE: -13.9%

AVERAGE: -7.3%

TOTAL: \$54,826,506

TOTAL: \$50,361,190

MEDIAN: -11.5%

MEDIAN: -6.3%

Key:
County salary is above the market median.
Recommended salary based on internal alignment.



Appendix II

Market Compensation Findings

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Accident Reconstruction Specialist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Diego	Accident Reconstruction Specialist	\$ 92,976	\$ 114,317		\$ 114,317	6/18/2021	unknown	unknown
2	County of San Bernardino	Incident Reconstruction Specialist	\$ 72,758	\$ 100,131	1.9%	\$ 102,034	7/31/2021	7/30/2022	3.00%
3	County of Los Angeles	Claims Investigator II	\$ 53,184	\$ 71,676	-3.8%	\$ 68,952	1/1/2021	unknown	unknown
4	County of Orange	N/C							
5	County of Ventura	N/C							
6	County of Contra Costa	N/C							
7	County of Alameda	N/C							
8	City and County of San Francisco	N/C							
9	County of Santa Clara	N/C							
10	County of Fresno	N/C							
11	County of Kern	N/C							
12	County of Sacramento	N/C							
13	County of San Mateo	N/C							
14	County of Riverside	N/C							

Summary Results		
	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 85,904	\$ 85,493
% County of San Diego Above/Below	24.9%	25.2%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Account Clerk									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Account Clerk	\$ 59,514	\$ 72,332	-17.4%	\$ 59,746	7/1/2021	1/8/2022	.50%
2	County of Riverside	Accounting Assistant II	\$ 34,740	\$ 54,204	1.9%	\$ 55,234	5/1/2021	5/1/2022	2.00%
3	County of Santa Clara	Account Clerk II	\$ 53,604	\$ 64,678	-16.8%	\$ 53,812	6/14/2021	6/13/2022	3.00%
4	County of Los Angeles	Account Clerk II	\$ 39,090	\$ 53,983	-3.8%	\$ 51,931	1/1/2021	unknown	unknown
5	County of Alameda	Account Clerk I	\$ 48,200	\$ 57,140	-11.4%	\$ 50,626	6/27/2021	6/26/2022	3.25%
6	County of San Mateo	Fiscal Office Assistant I	\$ 48,297	\$ 60,381	-17.5%	\$ 49,815	10/4/2020	unknown	unknown
7	County of San Bernardino	Fiscal Assistant	\$ 33,779	\$ 46,363	1.9%	\$ 47,244	7/31/2021	7/30/2022	3.00%
8	County of Ventura	Accounting Assistant I	\$ 33,587	\$ 47,022	-0.7%	\$ 46,692	12/27/2020	12/26/2021	2.00%
9	County of Sacramento	Account Clerk I	\$ 36,937	\$ 44,892	0.1%	\$ 44,937	6/21/2020	unknown	unknown
10	County of Orange	Accounting Assistant I	\$ 35,235	\$ 45,698	-2.0%	\$ 44,784	7/2/2021	7/1/2022	3.50%
11	County of Contra Costa	Account Clerk - Beginning Level	\$ 40,113	\$ 48,758	-11.1%	\$ 43,346	7/1/2021	unknown	unknown
12	County of San Diego	Account Clerk	\$ 35,173	\$ 43,243		\$ 43,243	6/18/2021	unknown	unknown
13	County of Fresno	Account Clerk I	\$ 30,186	\$ 38,610	4.7%	\$ 40,425	11/2/2020	unknown	unknown
14	County of Kern	Fiscal Support Assistant	\$ 29,748	\$ 36,324	1.2%	\$ 36,760	4/21/2021	unknown	unknown

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 48,758	\$ 47,244
% County of San Diego Above/Below	-12.8%	-9.3%
Number of Matches	13	13

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Account Clerk Specialist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Senior Account Clerk	\$ 68,952	\$ 83,746	-17.4%	\$ 69,174	7/1/2021	1/8/2022	.50%
2	County of San Mateo	Lead Fiscal Office Assistant	\$ 55,535	\$ 69,367	-17.5%	\$ 57,228	10/4/2020	unknown	unknown
3	County of Alameda	Account Clerk II	\$ 51,583	\$ 61,005	-11.4%	\$ 54,051	6/27/2021	6/26/2022	3.25%
4	County of Ventura	Accounting Assistant II	\$ 37,319	\$ 52,246	-0.7%	\$ 51,881	12/27/2020	12/26/2021	2.00%
5	County of San Bernardino	Fiscal Specialist	\$ 36,754	\$ 50,482	1.9%	\$ 51,441	7/31/2021	7/30/2022	3.00%
6	County of Sacramento	Account Clerk II	\$ 41,969	\$ 51,010	0.1%	\$ 51,061	6/21/2020	unknown	unknown
7	County of San Diego	Account Clerk Specialist	\$ 40,539	\$ 49,816		\$ 49,816	6/18/2021	unknown	unknown
8	County of Fresno	Account Clerk III	\$ 37,154	\$ 47,554	4.7%	\$ 49,789	11/2/2020	unknown	unknown
9	County of Orange	Accounting Assistant II	\$ 37,856	\$ 49,691	-2.0%	\$ 48,697	7/2/2021	7/1/2022	3.50%
10	County of Contra Costa	Account Clerk - Experienced Level	\$ 44,848	\$ 48,758	-11.1%	\$ 43,346	7/1/2021	unknown	unknown
11	County of Kern	Fiscal Support Technician	\$ 32,868	\$ 40,128	1.2%	\$ 40,610	4/21/2021	unknown	unknown
12	County of Santa Clara	N/C							
13	County of Los Angeles	N/C							
14	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 50,746	\$ 51,251
% County of San Diego Above/Below	-1.9%	-2.9%
Number of Matches	10	10

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Accounting Technician									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Principal Account Clerk	\$ 77,868	\$ 94,644	-17.4%	\$ 78,176	7/1/2021	1/8/2022	.50%
2	County of Riverside	Accounting Technician II	\$ 45,468	\$ 69,096	1.9%	\$ 70,409	5/1/2021	5/1/2022	2.00%
3	County of Alameda	Accounting Technician	\$ 60,736	\$ 73,819	-11.4%	\$ 65,404	12/27/2020	12/26/2021	3.00%
4	County of Sacramento	Accounting Technician	\$ 53,495	\$ 65,020	0.1%	\$ 65,085	6/21/2020	unknown	unknown
5	County of Ventura	Accounting Technician	\$ 45,156	\$ 63,218	-0.7%	\$ 62,776	12/26/2020	12/27/2021	2.00%
6	County of Contra Costa	Accounting Technician	\$ 55,143	\$ 70,420	-11.1%	\$ 62,603	7/1/2021	unknown	Unknown
7	County of Los Angeles	Accounting Technician II	\$ 47,266	\$ 63,684	-3.8%	\$ 61,264	1/1/2021	unknown	unknown
8	County of San Mateo	Fiscal Office Specialist	\$ 58,301	\$ 72,861	-17.5%	\$ 60,110	10/4/2020	unknown	unknown
9	County of Orange	Accounting Technician	\$ 45,698	\$ 61,298	-2.0%	\$ 60,072	7/2/2021	7/1/2022	3.50%
10	County of Santa Clara	Accountant Assistant	\$ 59,475	\$ 71,791	-16.8%	\$ 59,730	6/14/2021	6/13/2022	3.00%
11	County of Fresno	Supervising Account Clerk	\$ 44,148	\$ 56,472	4.7%	\$ 59,126	11/2/2020	unknown	unknown
12	County of San Bernardino	Accounting Technician	\$ 41,454	\$ 57,075	1.9%	\$ 58,160	7/31/2021	7/30/2022	3.00%
13	County of Kern	Fiscal Support Supervisor	\$ 43,896	\$ 53,592	1.2%	\$ 54,235	4/21/2021	unknown	unknown
14	County of San Diego	Accounting Technician	\$ 43,222	\$ 53,144		\$ 53,144	6/18/2021	unknown	unknown

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 65,020	\$ 61,264
% County of San Diego Above/Below	-22.3%	-15.3%
Number of Matches	13	13

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Administrative Secretary I									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Los Angeles	Senior Secretary I	\$ 49,765	\$ 67,060	-3.8%	\$ 64,512	1/1/2021	unknown	unknown
2	City and County of San Francisco	Secretary I	\$ 60,300	\$ 73,272	-17.4%	\$ 60,523	7/1/2021	1/8/2022	.50%
3	County of San Mateo	Administrative Secretary I	\$ 57,948	\$ 72,383	-17.5%	\$ 59,716	10/4/2020	unknown	unknown
4	County of Riverside	Administrative Secretary I	\$ 40,080	\$ 55,980	1.9%	\$ 57,044	7/1/2021	7/14/2022	2.00%
5	County of Alameda	Secretary I	\$ 52,509	\$ 62,515	-11.4%	\$ 55,389	6/27/2021	6/26/2022	3.25%
6	County of Orange	Secretary I	\$ 40,040	\$ 52,998	-2.0%	\$ 51,938	7/2/2021	7/1/2022	3.50%
7	County of San Bernardino	Secretary I	\$ 36,754	\$ 50,482	1.9%	\$ 51,441	7/31/2021	7/30/2022	3.00%
8	County of San Diego	Administrative Secretary I	\$ 36,338	\$ 44,616		\$ 44,616	6/18/2021	unknown	unknown
9	County of Fresno	Administrative Assistant I	\$ 31,590	\$ 40,404	4.7%	\$ 42,303	11/2/2020	unknown	unknown
10	County of Contra Costa	N/C							
11	County of Ventura	N/C							
12	County of Sacramento	N/C							
13	County of Kern	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 59,248	\$ 56,216
% County of San Diego Above/Below	-32.8%	-26.0%
Number of Matches	8	8

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Administrative Secretary II									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Alameda	Secretary II	\$ 68,474	\$ 81,182	-11.4%	\$ 71,928	12/27/2020	12/26/2021	3.00%
2	City and County of San Francisco	Secretary II	\$ 69,780	\$ 84,816	-17.4%	\$ 70,058	7/1/2021	1/8/2022	.50%
3	County of Los Angeles	Senior Secretary II	\$ 52,535	\$ 70,803	-3.8%	\$ 68,113	1/1/2021	unknown	unknown
4	County of San Mateo	Administrative Secretary II	\$ 62,544	\$ 78,165	-17.5%	\$ 64,486	10/4/2020	unknown	unknown
5	County of Riverside	Administrative Secretary II	\$ 43,308	\$ 58,956	1.9%	\$ 60,076	7/1/2021	7/14/2022	2.00%
6	County of Santa Clara	Administrative Assistant	\$ 58,671	\$ 70,816	-16.8%	\$ 58,919	6/14/2021	6/13/2022	3.00%
7	County of Contra Costa	Secretary - Journey Level	\$ 45,900	\$ 63,274	-11.1%	\$ 56,250	7/1/2021	unknown	Unknown
8	County of Orange	Secretary II	\$ 43,014	\$ 57,346	-2.0%	\$ 56,199	7/2/2021	7/1/2022	3.50%
9	County of San Bernardino	Secretary II	\$ 39,541	\$ 54,350	1.9%	\$ 55,383	7/31/2021	7/30/2022	3.00%
10	County of San Diego	Administrative Secretary II	\$ 41,974	\$ 51,542		\$ 51,542	6/18/2021	unknown	unknown
11	County of Fresno	Administrative Assistant II	\$ 35,178	\$ 44,980	4.7%	\$ 47,094	11/2/2020	unknown	unknown
12	County of Ventura	N/C							
13	County of Kern	N/C							
14	County of Sacramento	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 67,039	\$ 59,497
% County of San Diego Above/Below	-30.1%	-15.4%
Number of Matches	10	10

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Admissions Clerk									
1	County of Riverside	Admissions and Collections Clerk	\$ 35,676	\$ 55,668	1.9%	\$ 56,726	5/1/2021	5/1/2022	2.00%
2	County of San Bernardino	Office Assistant III	\$ 33,779	\$ 46,363	1.9%	\$ 47,244	7/31/2021	7/30/2022	3.00%
3	County of Fresno	Admitting Interviewer II	\$ 33,618	\$ 43,004	4.7%	\$ 45,025	11/2/2020	unknown	unknown
4	County of Ventura	Medical Office Assistant II	\$ 31,955	\$ 44,687	-0.7%	\$ 44,374	12/27/2020	12/26/2021	2.00%
6	County of Kern	Patient Access Services Representative II	\$ 32,220	\$ 39,336	1.2%	\$ 39,808	4/21/2021	unknown	unknown
7	County of Orange	N/C							
8	County of Contra Costa	N/C							
9	County of Alameda	N/C							
10	City and County of San Francisco	N/C							
11	County of Santa Clara	N/C							
12	County of Los Angeles	N/C							
13	County of Sacramento	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 44,687	\$ 45,025
% County of San Diego Above/Below	-1.1%	-1.9%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Adult Protective Services Specialist									
1	City and County of San Francisco	Protective Services Worker	\$ 95,676	\$ 122,040	-17.4%	\$ 100,805	7/1/2021	1/8/2022	.50%
2	County of Santa Clara	Deputy Public Guardian - Conservator	\$ 86,501	\$ 104,664	-16.8%	\$ 87,080	6/14/2021	6/13/2022	3.00%
3	County of Alameda	Adult Protective Services Worker II	\$ 85,246	\$ 97,790	-11.4%	\$ 86,642	6/27/2021	6/26/2022	3.25%
4	County of Orange	Senior Social Worker	\$ 63,440	\$ 85,613	-2.0%	\$ 83,901	7/2/2021	7/1/2022	3.50%
5	County of San Bernardino	Social Service Practitioner II	\$ 57,554	\$ 81,078	1.9%	\$ 82,619	3/13/2021	3/26/2022	3.00%
6	County of Contra Costa	Social Worker II	\$ 78,259	\$ 86,280	-11.1%	\$ 76,703	7/1/2021	unknown	unknown
8	County of Ventura	HS Adult Protective Services Social Worker II	\$ 56,079	\$ 74,772	-0.7%	\$ 74,249	12/26/2020	12/27/2021	2.00%
9	County of Kern	Social Service Worker IV	\$ 52,536	\$ 64,128	1.2%	\$ 64,898	4/21/2021	unknown	unknown
10	County of Fresno	Social Worker II	\$ 44,980	\$ 57,538	4.7%	\$ 60,242	11/2/2020	unknown	unknown
11	County of Sacramento	N/C							
12	County of Los Angeles	N/C							
13	County of Riverside	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 85,613	\$ 82,619
% County of San Diego Above/Below	-13.7%	-9.7%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Adult Protective Services Supervisor									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Protective Services Supervisor	\$ 107,460	\$ 137,232	-17.4%	\$ 113,354	7/1/2021	1/8/2022	.50%
2	County of Santa Clara	Supervising Deputy Public Guardian	\$ 108,948	\$ 132,434	-16.8%	\$ 110,185	6/28/2021	6/27/2022	3.00%
3	County of Alameda	Adult Protection Supervisor	\$ 96,554	\$ 116,771	-11.4%	\$ 103,459	12/27/2020	12/26/2021	3.00%
4	County of Contra Costa	Social Work Supervisor II	\$ 94,644	\$ 115,041	-11.1%	\$ 102,272	7/1/2021	unknown	Unknown
5	County of San Bernardino	Supervising Social Service Practitioner	\$ 69,243	\$ 95,326	1.9%	\$ 97,138	7/31/2021	7/30/2022	3.00%
6	County of San Diego	Adult Protective Services Supervisor	\$ 75,317	\$ 92,602		\$ 92,602	6/18/2021	unknown	unknown
7	County of Ventura	HS Adult Protective Services Supervisor	\$ 90,918	\$ 93,042	-0.7%	\$ 92,390	12/26/2020	12/27/2021	2.00%
8	County of Fresno	Social Work Supervisor	\$ 64,350	\$ 82,290	4.7%	\$ 86,158	11/2/2020	unknown	unknown
9	County of Orange	Social Services Supervisor I	\$ 63,440	\$ 85,613	-2.0%	\$ 83,901	7/2/2021	7/1/2022	3.50%
10	County of Sacramento	N/C							
11	County of Los Angeles	N/C							
12	County of Riverside	N/C							
13	County of San Mateo	N/C							
14	County of Kern	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 105,184	\$ 99,705
% County of San Diego Above/Below	-13.6%	-7.7%
Number of Matches	8	8

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Aging Program Specialist I									
1	County of San Mateo	Community Program Analyst I	\$ 73,776	\$ 92,246	-17.5%	\$ 76,103	10/4/2020	unknown	unknown
2	County of Riverside	Office on Aging Program Specialist I	\$ 46,213	\$ 68,379	1.9%	\$ 69,678	5/1/2021	5/1/2022	2.00%
4	County of Orange	N/C							
5	County of Ventura	N/C							
6	County of Contra Costa	N/C							
7	County of Sacramento	N/C							
8	City and County of San Francisco	N/C							
9	County of Santa Clara	N/C							
10	County of Los Angeles	N/C							
11	County of Fresno	N/C							
12	County of Kern	N/C							
13	County of Alameda	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 80,313	\$ 72,891
% County of San Diego Above/Below	-39.8%	-26.9%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Aging Program Specialist II									
1	County of San Mateo	Community Program Analyst II	\$ 86,630	\$ 108,241	-17.5%	\$ 89,299	10/4/2020	unknown	unknown
2	City and County of San Francisco	Program Specialist	\$ 87,540	\$ 106,416	-17.4%	\$ 87,900	7/1/2021	1/8/2022	.50%
3	County of Riverside	Office on Aging Program Specialist II	\$ 52,466	\$ 77,642	1.9%	\$ 79,118	5/1/2021	5/1/2022	2.00%
4	County of Contra Costa	Social Worker	\$ 69,561	\$ 84,551	-11.1%	\$ 75,166	7/1/2021	unknown	Unknown
6	County of Ventura	N/C							
7	County of Orange	N/C							
8	County of Kern	N/C							
9	County of San Bernardino	N/C							
10	County of Sacramento	N/C							
11	County of Alameda	N/C							
12	County of Fresno	N/C							
13	County of Los Angeles	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 95,484	\$ 83,509
% County of San Diego Above/Below	-36.6%	-19.5%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Aging Program Specialist III									
1	County of Contra Costa ¹	[Social Worker/Aging and Adult Services Senior Staff Assistant]	\$ 82,641	\$ 100,451	-11.1%	\$ 89,301	7/1/2021	unknown	unknown
2	County of Orange	Social Services Supervisor I	\$ 63,440	\$ 85,613	-2.0%	\$ 83,901	7/2/2021	7/1/2022	3.50%
4	City and County of San Francisco	N/C							
5	County of Ventura	N/C							
6	County of Los Angeles	N/C							
7	County of San Mateo	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Sacramento	N/C							
11	County of Alameda	N/C							
12	County of San Bernardino	N/C							
13	County of Riverside	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 93,032	\$ 86,601
% County of San Diego Above/Below	-16.6%	-8.5%
Number of Matches	2	2

N/C - Non Comparator

1 - County of Contra Costa: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Agricultural Civil Actions Investigator									
2	City and County of San Francisco	N/C							
3	County of Alameda	N/C							
4	County of Contra Costa	N/C							
5	County of Fresno	N/C							
6	County of Kern	N/C							
7	County of Los Angeles	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	N/A	N/A
% County of San Diego Above/Below	N/A	N/A
Number of Matches	0	0

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Agricultural Scientist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Diego	Agricultural Scientist	\$ 89,398	\$ 109,907		\$ 109,907	6/18/2021	unknown	unknown
2	County of Los Angeles	Senior Biologist	\$ 77,748	\$ 104,772	-3.8%	\$ 100,791	1/1/2021	unknown	unknown
3	County of Santa Clara	Agricultural Biologist II	\$ 69,561	\$ 84,080	-16.8%	\$ 69,954	6/14/2021	6/13/2022	3.00%
4	County of Orange	N/C							
5	County of Ventura	N/C							
6	County of Contra Costa	N/C							
7	City and County of San Francisco	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Sacramento	N/C							
11	County of Alameda	N/C							
12	County of San Mateo	N/C							
13	County of San Bernardino	N/C							
14	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 94,426	\$ 85,373
% County of San Diego Above/Below	14.1%	22.3%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Agricultural Standards Inspector									
1	County of Orange	Agricultural/Standards Inspector	\$ 59,384	\$ 79,997	-2.0%	\$ 78,397	7/2/2021	7/1/2022	3.50%
2	County of Santa Clara	Biologist/Standards Specialist	\$ 76,465	\$ 92,537	-16.8%	\$ 76,991	6/14/2021	6/13/2022	3.00%
3	County of Los Angeles	Agricultural/Weights & Measures Inspector II	\$ 58,848	\$ 79,302	-3.8%	\$ 76,288	1/1/2021	unknown	unknown
5	County of Alameda	Agricultural and Standards Investigator II	\$ 70,083	\$ 84,123	-11.4%	\$ 74,533	6/27/2021	6/26/2022	3.25%
6	County of San Mateo ¹	[Biologist / Standards Specialist I/ Biologist/Standards Specialist II]	\$ 77,770	\$ 86,287	-17.5%	\$ 71,187	10/4/2020	unknown	unknown
7	City and County of San Francisco	Agricultural Inspector	\$ 69,108	\$ 83,976	-17.4%	\$ 69,364	7/1/2021	1/8/2022	.50%
8	County of Contra Costa	Agricultural Biologist I	\$ 62,558	\$ 76,040	-11.1%	\$ 67,599	7/1/2021	unknown	unknown
9	County of Fresno	Agricultural/Standards Specialist II	\$ 50,206	\$ 61,022	4.7%	\$ 63,890	4/19/2021	unknown	unknown
10	County of Sacramento	Agricultural and Standards Inspector I	\$ 50,759	\$ 61,721	0.1%	\$ 61,783	6/30/2021	unknown	unknown
11	County of Riverside	Agricultural & Standards Investigator II	\$ 44,064	\$ 60,228	1.9%	\$ 61,372	5/1/2021	5/1/2022	2.00%
12	County of Ventura	Agricultural Inspector/Biologist Associate	\$ 42,044	\$ 59,598	-0.7%	\$ 59,181	12/27/2020	12/26/2021	2.00%
13	County of San Bernardino	Agricultural/Standards Officer Trainee	\$ 40,872	\$ 54,829	1.9%	\$ 55,871	3/13/2021	3/26/2022	3.00%
14	County of Kern	Agricultural Biologist/Weights and Measures Inspector II	\$ 42,816	\$ 52,272	1.2%	\$ 52,899	4/21/2021	unknown	unknown

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 76,040	\$ 67,599
% County of San Diego Above/Below	-1.8%	9.5%
Number of Matches	13	13

N/C - Non Comparator

1 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches. Bottom of range is for II level only; I level has only 1 step.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Air Pollution Control Aide*									
1	South Coast Air Quality Management District	Staff Assistant	\$ 43,572	\$ 59,004	-2.8%	\$ 57,352	1/1/2020	unknown	unknown
2	San Luis Obispo County Air Pollution Control District	APCD Administrative Assistant II	\$ 45,490	\$ 55,307	2.9%	\$ 56,911	7/1/2020	unknown	unknown
4	Bay Area Air Quality Management District	Office Assistant II	\$ 52,496	\$ 63,810	-17.4%	\$ 52,707	11/8/2020	unknown	Unknown
5	Sacramento Metropolitan Air Quality Management District	N/C							
6	County of Orange	N/C							
7	County of Ventura	N/C							
8	County of Contra Costa	N/C							
9	Imperial County Air Pollution Control District	N/C							
10	County of Sacramento	N/C							
11	City and County of San Francisco	N/C							
12	County of Santa Clara	N/C							
13	County of Los Angeles	N/C							
14	County of Fresno	N/C							
15	County of Kern	N/C							
16	County of Alameda	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 59,004	\$ 56,911
% County of San Diego Above/Below	-6.9%	-3.1%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Air Pollution Control Civil Actions Investigator*									
2	South Coast Air Quality Management District	Investigator	\$ 75,696	\$ 102,444	-2.8%	\$ 99,576	1/1/2020	unknown	unknown
3	Bay Area Air Quality Management District	Air Quality Case Settlement Specialist II	\$ 89,786	\$ 109,136	-17.4%	\$ 90,146	11/8/2020	unknown	Unknown
4	Sacramento Metropolitan Air Quality Management District	N/C							
5	County of Orange	N/C							
6	County of Ventura	N/C							
7	County of Contra Costa	N/C							
8	San Luis Obispo County Air Pollution Control District	N/C							
9	Imperial County Air Pollution Control District	N/C							
10	County of Sacramento	N/C							
11	City and County of San Francisco	N/C							
12	County of Santa Clara	N/C							
13	County of Los Angeles	N/C							
14	County of Fresno	N/C							
15	County of Kern	N/C							
16	County of Alameda	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 105,790	\$ 94,861
% County of San Diego Above/Below	-5.0%	5.9%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Air Pollution Control Small Business Assistant Program Specialist*									
2	South Coast Air Quality Management District	N/C							
3	Bay Area Air Quality Management District	N/C							
4	County of Orange	N/C							
5	County of Ventura	N/C							
6	Sacramento Metropolitan Air Quality Management District	N/C							
7	San Luis Obispo County Air Pollution Control District	N/C							
8	Imperial County Air Pollution Control District	N/C							
9	County of Contra Costa	N/C							
10	County of Sacramento	N/C							
11	City and County of San Francisco	N/C							
12	County of Santa Clara	N/C							
13	County of Los Angeles	N/C							
14	County of Fresno	N/C							
15	County of Kern	N/C							
16	County of Alameda	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	N/A	N/A
% County of San Diego Above/Below	N/A	N/A
Number of Matches	0	0

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Air Pollution Test Technician (T)*									
2	South Coast Air Quality Management District	Laboratory Technician	\$ 51,648	\$ 69,948	-2.8%	\$ 67,989	1/1/2020	unknown	unknown
3	Bay Area Air Quality Management District	Air Quality Technical Assistant	\$ 67,000	\$ 81,439	-17.4%	\$ 67,269	11/8/2020	unknown	Unknown
4	Sacramento Metropolitan Air Quality Management District	N/C							
5	County of Orange	N/C							
6	County of Ventura	N/C							
7	County of Contra Costa	N/C							
8	San Luis Obispo County Air Pollution Control District	N/C							
9	Imperial County Air Pollution Control District	N/C							
10	County of Sacramento	N/C							
11	City and County of San Francisco	N/C							
12	County of Santa Clara	N/C							
13	County of Los Angeles	N/C							
14	County of Fresno	N/C							
15	County of Kern	N/C							
16	County of Alameda	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 75,693	\$ 67,629
% County of San Diego Above/Below	-3.7%	7.3%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Air Quality Inspector I*									
1	Sacramento Metropolitan Air Quality Management District	Air Quality Specialist (Assistant)	\$ 84,056	\$ 102,171	0.1%	\$ 102,273	7/1/2021	unknown	unknown
2	San Luis Obispo County Air Pollution Control District	Air Quality Specialist I	\$ 67,496	\$ 82,035	2.9%	\$ 84,414	7/1/2020	unknown	unknown
3	Bay Area Air Quality Management District	Air Quality Inspector I	\$ 77,561	\$ 94,276	-17.4%	\$ 77,872	11/8/2020	unknown	Unknown
5	County of Kern	Air Quality Specialist I	\$ 58,620	\$ 71,568	1.2%	\$ 72,427	4/21/2021	unknown	unknown
6	South Coast Air Quality Management District	Air Quality Inspector I	\$ 51,420	\$ 69,600	-2.8%	\$ 67,651	1/1/2020	unknown	unknown
7	Imperial County Air Pollution Control District	Air Pollution Control Inspector I	\$ 35,172	\$ 44,964	5.6%	\$ 47,482	7/3/2020	unknown	unknown
8	County of Ventura	N/C							
9	County of Orange	N/C							
10	County of Contra Costa	N/C							
11	County of Alameda	N/C							
12	City and County of San Francisco	N/C							
13	County of Santa Clara	N/C							
14	County of Los Angeles	N/C							
15	County of Fresno	N/C							
16	County of Sacramento	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 76,802	\$ 75,149
% County of San Diego Above/Below	0.8%	2.9%
Number of Matches	6	6

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Air Quality Inspector II*									
1	Sacramento Metropolitan Air Quality Management District	Air Quality Specialist (Associate)	\$ 97,627	\$ 118,666	0.1%	\$ 118,785	7/1/2021	unknown	unknown
2	San Luis Obispo County Air Pollution Control District	Air Quality Specialist II	\$ 76,086	\$ 92,498	2.9%	\$ 95,180	7/1/2020	unknown	unknown
4	Bay Area Air Quality Management District	Air Quality Inspector II	\$ 85,511	\$ 103,939	-17.4%	\$ 85,854	11/8/2020	unknown	Unknown
5	South Coast Air Quality Management District	Air Quality Inspector II	\$ 64,812	\$ 87,732	-2.8%	\$ 85,276	1/1/2020	unknown	unknown
6	County of Kern	Air Quality Specialist II	\$ 64,776	\$ 79,080	1.2%	\$ 80,029	4/21/2021	unknown	unknown
7	Imperial County Air Pollution Control District	Air Pollution Control Inspector II	\$ 40,668	\$ 51,960	5.6%	\$ 54,870	7/3/2020	unknown	unknown
8	County of Ventura	N/C							
9	County of Orange	N/C							
10	County of Contra Costa	N/C							
11	County of Alameda	N/C							
12	City and County of San Francisco	N/C							
13	County of Santa Clara	N/C							
14	County of Los Angeles	N/C							
15	County of Fresno	N/C							
16	County of Sacramento	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 90,115	\$ 85,565
% County of San Diego Above/Below	-0.4%	4.6%
Number of Matches	6	6

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Air Quality Specialist*									
1	Sacramento Metropolitan Air Quality Management District	Air Quality Planner-Analyst (Associate)	\$ 97,627	\$ 118,666	0.1%	\$ 118,785	7/1/2021	unknown	unknown
2	South Coast Air Quality Management District	Air Quality Specialist	\$ 80,952	\$ 108,780	-2.8%	\$ 105,734	1/1/2020	unknown	unknown
3	Bay Area Air Quality Management District	Environmental Planner II	\$ 98,990	\$ 120,322	-17.4%	\$ 99,386	11/8/2020	unknown	unknown
5	San Luis Obispo County Air Pollution Control District	Air Quality Specialist II	\$ 76,086	\$ 92,498	2.9%	\$ 95,180	7/1/2020	unknown	unknown
6	Imperial County Air Pollution Control District	Air Pollution Control Environmental Coordinator II	\$ 57,396	\$ 73,308	5.6%	\$ 77,413	7/3/2020	unknown	unknown
7	County of Ventura	N/C							
8	County of Orange	N/C							
9	County of Contra Costa	N/C							
10	County of Sacramento	N/C							
11	City and County of San Francisco	N/C							
12	County of Santa Clara	N/C							
13	County of Los Angeles	N/C							
14	County of Fresno	N/C							
15	County of Kern	N/C							
16	County of Alameda	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 108,780	\$ 99,386
% County of San Diego Above/Below	-9.8%	-0.3%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Alcohol & Drug Program Specialist									
1	County of San Mateo	Behavioral Health And Recovery Services Analyst II	\$ 89,043	\$ 111,257	-17.5%	\$ 91,787	10/4/2020	unknown	unknown
2	County of Santa Clara	Quality Improvement Coordinator I - Alcohol & Drug Services	\$ 89,037	\$ 107,723	-16.8%	\$ 89,626	6/14/2021	6/13/2022	3.00%
3	City and County of San Francisco	Program Specialist	\$ 87,540	\$ 106,416	-17.4%	\$ 87,900	7/1/2021	1/8/2022	.50%
5	County of Sacramento	Mental Health Planning Analyst	\$ 65,354	\$ 79,428	0.1%	\$ 79,507	6/21/2020	unknown	unknown
6	County of Fresno	Substance Abuse Specialist II	\$ 42,146	\$ 53,924	4.7%	\$ 56,458	11/2/2020	unknown	unknown
7	County of Los Angeles	Substance Abuse Counselor	\$ 37,232	\$ 50,010	-3.8%	\$ 48,109	1/1/2021	unknown	unknown
8	County of Ventura	N/C							
9	County of Contra Costa	N/C							
10	County of Orange	N/C							
11	County of Riverside	N/C							
12	County of San Bernardino	N/C							
13	County of Alameda	N/C							
14	County of Kern	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 92,922	\$ 83,704
% County of San Diego Above/Below	-13.5%	-2.2%
Number of Matches	6	6

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Animal Care Attendant									
1	City and County of San Francisco	Animal Care Attendant	\$ 57,828	\$ 73,764	-17.4%	\$ 60,929	7/1/2021	1/8/2022	.50%
2	County of Los Angeles	Animal Care Attendant II	\$ 41,736	\$ 56,148	-3.8%	\$ 54,014	1/1/2021	unknown	unknown
3	County of Sacramento	Animal Care Attendant	\$ 43,034	\$ 52,304	0.1%	\$ 52,356	6/21/2020	unknown	unknown
4	County of Orange	Animal Care Attendant	\$ 37,710	\$ 50,835	-2.0%	\$ 49,819	7/2/2021	7/1/2022	3.50%
5	County of Contra Costa ¹	[Animal Services Utility Worker/Animal Center Technician]	\$ 45,570	\$ 55,391	-11.1%	\$ 49,242	7/1/2021	unknown	Unknown
6	County of Ventura	Animal Control Officer I	\$ 34,958	\$ 48,956	-0.7%	\$ 48,613	12/26/2020	12/27/2021	2.00%
7	County of Alameda	Animal Control Aide	\$ 45,059	\$ 54,804	-11.4%	\$ 48,556	6/27/2021	6/26/2022	3.25%
8	County of Santa Clara	Kennel Attendant	\$ 48,441	\$ 58,305	-16.8%	\$ 48,509	6/14/2021	6/13/2022	3.00%
10	County of Riverside	Animal Care Technician	\$ 29,976	\$ 46,764	1.9%	\$ 47,653	5/1/2021	5/1/2022	2.00%
11	County of Kern	Animal Care Worker	\$ 29,304	\$ 35,784	1.2%	\$ 36,213	4/21/2021	unknown	unknown
12	County of San Mateo	N/C							
13	County of Fresno	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 53,554	\$ 48,928
% County of San Diego Above/Below	-10.8%	-1.3%
Number of Matches	10	10

N/C - Non Comparator

1 - County of Contra Costa: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Animal Control Officer									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Orange	Animal Control Officer	\$ 57,949	\$ 78,104	-2.0%	\$ 76,542	7/2/2021	7/1/2022	3.50%
2	County of Riverside	Animal Control & License Officer II	\$ 42,408	\$ 66,264	1.9%	\$ 67,523	5/1/2021	5/1/2022	2.00%
3	City and County of San Francisco	Animal Control Officer	\$ 64,068	\$ 81,744	-17.4%	\$ 67,521	7/1/2021	1/8/2022	.50%
4	County of Contra Costa	Animal Services Officer	\$ 57,903	\$ 75,747	-11.1%	\$ 67,339	7/1/2021	unknown	unknown
5	County of Alameda	Sheriff's Technician	\$ 59,854	\$ 71,429	-11.4%	\$ 63,286	6/27/2021	6/26/2022	3.25%
6	County of Los Angeles	Animal Control Officer II	\$ 48,556	\$ 65,431	-3.8%	\$ 62,944	1/1/2021	unknown	unknown
7	County of San Diego	Animal Control Officer	\$ 46,384	\$ 59,925		\$ 59,925	6/18/2021	unknown	unknown
8	County of Ventura	Animal Control Officer III	\$ 41,933	\$ 59,078	-0.7%	\$ 58,664	12/26/2020	12/27/2021	2.00%
9	County of Sacramento	Animal Control Officer	\$ 48,170	\$ 58,548	0.1%	\$ 58,607	6/21/2020	unknown	unknown
10	County of Santa Clara	Animal Control Officer	\$ 58,165	\$ 70,217	-16.8%	\$ 58,420	6/14/2021	6/13/2022	3.00%
11	County of San Bernardino	Animal Control Officer	\$ 38,174	\$ 52,458	1.9%	\$ 53,454	7/31/2021	7/30/2022	3.00%
12	County of Kern	Animal Control Officer	\$ 32,220	\$ 39,336	1.2%	\$ 39,808	4/21/2021	unknown	unknown
13	County of San Mateo	N/C							
14	County of Fresno	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 66,264	\$ 62,944
% County of San Diego Above/Below	-10.6%	-5.0%
Number of Matches	11	11

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Animal Medical Operations Manager									
1	County of Contra Costa ¹	[Animal Center Operations Manager/Chief of Shelter Medicine]	\$ 98,752	\$ 120,034	-11.1%	\$ 106,710	7/1/2021	unknown	unknown
3	County of Orange	N/C							
4	County of Ventura	N/C							
5	County of Santa Clara	N/C							
6	County of Los Angeles	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Sacramento	N/C							
10	County of Alameda	N/C							
11	County of San Mateo	N/C							
12	County of San Bernardino	N/C							
13	County of Riverside	N/C							
14	City and County of San Francisco	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 120,034	\$ 106,710
% County of San Diego Above/Below	-18.2%	-5.0%
Number of Matches	1	1

N/C - Non Comparator

1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Animal Services Dispatcher									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Orange	Animal Control Assistant	\$ 39,790	\$ 53,622	-2.0%	\$ 52,550	7/2/2021	7/1/2022	3.50%
2	County of Riverside	Animal Services Dispatcher	\$ 37,015	\$ 50,082	1.9%	\$ 51,034	5/1/2021	5/1/2022	2.00%
3	County of San Diego	Animal Services Dispatcher	\$ 38,813	\$ 47,715		\$ 47,715	6/18/2021	unknown	unknown
4	County of Kern	Animal Control Dispatcher	\$ 30,348	\$ 37,056	1.2%	\$ 37,501	4/21/2021	unknown	unknown
5	County of Ventura	N/C							
6	County of Contra Costa	N/C							
7	County of Alameda	N/C							
8	City and County of San Francisco	N/C							
9	County of Santa Clara	N/C							
10	County of Los Angeles	N/C							
11	County of Fresno	N/C							
12	County of Sacramento	N/C							
13	County of San Mateo	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 50,082	\$ 51,034
% County of San Diego Above/Below	-5.0%	-7.0%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Animal Services Representative									
1	County of Alameda	Sheriff's Technician	\$ 59,854	\$ 71,429	-11.4%	\$ 63,286	6/27/2021	6/26/2022	3.25%
2	City and County of San Francisco	Clerk Typist	\$ 57,696	\$ 70,152	-17.4%	\$ 57,946	7/1/2021	1/8/2022	.50%
3	County of Orange	Animal Control Services Representative	\$ 39,250	\$ 52,125	-2.0%	\$ 51,082	7/2/2021	7/1/2022	3.50%
4	County of Riverside	Animal Services Representative	\$ 37,015	\$ 50,082	1.9%	\$ 51,034	5/1/2021	5/1/2022	2.00%
5	County of Santa Clara	Office Specialist II	\$ 48,587	\$ 58,483	-16.8%	\$ 48,658	6/14/2021	6/13/2022	3.00%
7	County of Contra Costa	Animal Services Clerk	\$ 45,016	\$ 50,643	-11.1%	\$ 45,022	7/1/2021	unknown	Unknown
8	County of Ventura	N/C							
9	County of Sacramento	N/C							
10	County of Los Angeles	N/C							
11	County of Fresno	N/C							
12	County of Kern	N/C							
13	County of San Bernardino	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 55,304	\$ 51,058
% County of San Diego Above/Below	-20.2%	-11.0%
Number of Matches	6	6

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Appraiser I									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Orange	Appraiser I	\$ 60,258	\$ 81,182	-2.0%	\$ 79,559	7/2/2021	7/1/2022	3.50%
2	County of Ventura	Appraiser I	\$ 53,560	\$ 74,907	-0.7%	\$ 74,383	1/10/2021	1/9/2022	2.00%
3	County of Sacramento	Real Property Appraiser II	\$ 61,095	\$ 74,249	0.1%	\$ 74,323	6/21/2020	unknown	unknown
4	County of Alameda ¹	[Appraiser I/ Appraiser II]	\$ 72,043	\$ 82,534	-11.4%	\$ 73,125	6/27/2021	6/26/2022	3.25%
5	County of Riverside	Appraiser I	\$ 46,800	\$ 69,252	1.9%	\$ 70,568	5/1/2021	5/1/2022	2.00%
6	County of San Diego	Appraiser I	\$ 57,283	\$ 70,450		\$ 70,450	6/18/2021	unknown	unknown
7	County of Santa Clara	Appraiser I	\$ 69,518	\$ 83,963	-16.8%	\$ 69,858	6/14/2021	6/13/2022	3.00%
8	County of Contra Costa	Junior Appraiser	\$ 70,833	\$ 78,093	-11.1%	\$ 69,425	7/1/2021	unknown	unknown
9	County of San Mateo ²	Appraiser I	\$ 71,343	\$ 79,725	-17.5%	\$ 65,773	10/4/2020	unknown	unknown
10	County of Fresno	Appraiser I	\$ 43,342	\$ 52,702	4.7%	\$ 55,179	10/17/2019	unknown	unknown
11	County of Kern	Appraiser I	\$ 43,248	\$ 52,800	1.2%	\$ 53,434	4/21/2021	unknown	unknown
12	City and County of San Francisco	N/C							
13	County of Los Angeles	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 76,500	\$ 70,213
% County of San Diego Above/Below	-8.6%	0.3%
Number of Matches	10	10

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

2 - County of San Mateo: Bottom of range is step 3.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Appraiser II									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Los Angeles	Appraiser	\$ 51,631	\$ 93,779	-3.8%	\$ 90,215	1/1/2021	unknown	unknown
2	City and County of San Francisco	Real Property Appraiser	\$ 89,028	\$ 108,216	-17.4%	\$ 89,386	7/1/2021	1/8/2022	.50%
3	County of Orange	Appraiser II	\$ 67,246	\$ 90,522	-2.0%	\$ 88,711	7/2/2021	7/1/2022	3.50%
4	County of Sacramento	Associate Real Property Appraiser	\$ 71,723	\$ 87,174	0.1%	\$ 87,261	6/21/2020	unknown	unknown
5	County of Ventura	Appraiser II	\$ 61,761	\$ 86,582	-0.7%	\$ 85,976	1/10/2021	1/9/2022	2.00%
6	County of Riverside	Appraiser II	\$ 55,092	\$ 81,552	1.9%	\$ 83,101	5/1/2021	5/1/2022	2.00%
7	County of San Mateo	Appraiser II	\$ 78,851	\$ 98,590	-17.5%	\$ 81,337	10/4/2020	unknown	unknown
8	County of San Bernardino	Appraiser II	\$ 58,074	\$ 79,789	1.9%	\$ 81,305	7/31/2021	7/30/2022	3.00%
9	County of Santa Clara	Appraiser II	\$ 80,361	\$ 97,221	-16.8%	\$ 80,888	6/14/2021	6/13/2022	3.00%
10	County of San Diego	Appraiser II	\$ 65,520	\$ 80,454		\$ 80,454	6/18/2021	unknown	unknown
11	County of Alameda	Appraiser II	\$ 74,112	\$ 88,709	-11.4%	\$ 78,596	6/27/2021	6/26/2022	3.25%
12	County of Contra Costa	Assistant Appraiser	\$ 70,973	\$ 86,268	-11.1%	\$ 76,693	7/1/2021	unknown	unknown
13	County of Fresno	Appraiser II	\$ 50,024	\$ 60,788	4.7%	\$ 63,645	10/17/2019	unknown	unknown
14	County of Kern	Appraiser II	\$ 48,744	\$ 59,508	1.2%	\$ 60,222	4/21/2021	unknown	unknown

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 87,174	\$ 81,337
% County of San Diego Above/Below	-8.4%	-1.1%
Number of Matches	13	13

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Appraiser III									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Senior Real Property Appraiser	\$ 103,092	\$ 125,292	-17.4%	\$ 103,491	7/1/2021	1/8/2022	.50%
2	County of Orange	Appraiser III	\$ 74,589	\$ 100,485	-2.0%	\$ 98,475	7/2/2021	7/1/2022	3.50%
3	County of San Diego	Appraiser III	\$ 73,840	\$ 90,792		\$ 90,792	6/18/2021	unknown	unknown
4	County of Ventura ³	[Appraiser II/ Appraiser III]	\$ 65,150	\$ 91,334	-0.7%	\$ 90,695	1/10/2021	1/9/2022	2.00%
5	County of Alameda	Appraiser III	\$ 84,099	\$ 101,273	-11.4%	\$ 89,728	6/27/2021	6/26/2022	3.25%
6	County of San Bernardino	Appraiser III	\$ 63,918	\$ 87,942	1.9%	\$ 89,613	7/31/2021	7/30/2022	3.00%
7	County of Santa Clara	Appraiser III	\$ 88,159	\$ 106,669	-16.8%	\$ 88,748	6/14/2021	6/13/2022	3.00%
8	County of San Mateo ²	[Appraiser II/Senior Appraiser]	\$ 84,197	\$ 105,267	-17.5%	\$ 86,845	10/4/2020	unknown	unknown
9	County of Contra Costa ¹	[Assistant Appraiser/Associate Appraiser]	\$ 77,813	\$ 94,582	-11.1%	\$ 84,083	7/1/2021	unknown	unknown
10	County of Fresno	Appraiser III	\$ 58,968	\$ 71,656	4.7%	\$ 75,024	10/17/2019	unknown	unknown
11	County of Kern	Appraiser III	\$ 58,620	\$ 71,568	1.2%	\$ 72,427	4/21/2021	unknown	unknown
12	County of Los Angeles	N/C							
13	County of Riverside	N/C							
14	County of Sacramento	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 97,533	\$ 89,181
% County of San Diego Above/Below	-7.4%	1.8%
Number of Matches	10	10

N/C - Non Comparator

1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

2 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

3 - County of Ventura: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Appraiser IV									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Orange	Principal Appraiser	\$ 83,408	\$ 112,091	-2.0%	\$ 109,849	7/2/2021	7/1/2022	3.50%
2	County of Los Angeles	Appraiser Specialist I	\$ 77,559	\$ 104,517	-3.8%	\$ 100,545	1/1/2021	unknown	unknown
3	County of San Diego	Appraiser IV	\$ 81,328	\$ 99,882		\$ 99,882	6/18/2021	unknown	unknown
4	County of Sacramento	Senior Real Property Appraiser	\$ 78,947	\$ 95,964	0.1%	\$ 96,060	6/21/2020	unknown	unknown
5	County of Ventura	Appraiser III	\$ 68,539	\$ 96,088	-0.7%	\$ 95,416	1/10/2021	1/9/2022	2.00%
6	County of San Mateo	Senior Appraiser	\$ 89,542	\$ 111,943	-17.5%	\$ 92,353	10/4/2020	unknown	unknown
7	County of Contra Costa	Associate Appraiser	\$ 84,652	\$ 102,895	-11.1%	\$ 91,474	7/1/2021	unknown	unknown
8	County of Riverside	Senior Appraiser	\$ 59,301	\$ 87,758	1.9%	\$ 89,425	5/1/2021	5/1/2022	2.00%
9	County of Fresno	Special Properties Appraiser	\$ 67,860	\$ 82,498	4.7%	\$ 86,375	4/19/2021	unknown	unknown
10	County of Alameda	N/C							
11	City and County of San Francisco	N/C							
12	County of Santa Clara	N/C							
13	County of San Bernardino	N/C							
14	County of Kern	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 99,492	\$ 93,885
% County of San Diego Above/Below	0.4%	6.0%
Number of Matches	8	8

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Appraiser Trainee									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Ventura	Appraiser Trainee	\$ 51,274	\$ 69,322	-0.7%	\$ 68,837	1/10/2021	1/9/2022	2.00%
2	County of Alameda	Appraiser I	\$ 69,965	\$ 76,367	-11.4%	\$ 67,661	6/27/2021	6/26/2022	3.25%
3	City and County of San Francisco	Real Property Appraiser Trainee	\$ 67,164	\$ 81,564	-17.4%	\$ 67,372	7/1/2021	1/8/2022	.50%
4	County of Orange	Appraiser Trainee	\$ 48,942	\$ 65,354	-2.0%	\$ 64,046	7/2/2021	7/1/2022	3.50%
5	County of Santa Clara	Appraisal Aide	\$ 62,483	\$ 75,492	-16.8%	\$ 62,809	6/14/2021	6/13/2022	3.00%
6	County of Sacramento	Real Property Appraiser I	\$ 50,634	\$ 61,533	0.1%	\$ 61,595	6/21/2020	unknown	unknown
7	County of Riverside	Appraiser Trainee	\$ 40,280	\$ 59,560	1.9%	\$ 60,692	5/1/2021	5/1/2022	2.00%
8	County of San Diego	Appraiser Trainee	\$ 47,195	\$ 57,949		\$ 57,949	6/18/2021	unknown	unknown
9	County of San Bernardino	Appraiser Trainee	\$ 41,454	\$ 55,640	1.9%	\$ 56,697	7/31/2021	7/30/2022	3.00%
10	County of Contra Costa	N/C							
11	County of San Mateo	N/C							
12	County of Kern	N/C							
13	County of Fresno	N/C							
14	County of Los Angeles	N/C							

Summary Results		
	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 67,338	\$ 63,428
% County of San Diego Above/Below	-16.2%	-9.5%
Number of Matches	8	8

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Assessment Clerk									
1	City and County of San Francisco	Clerk	\$ 55,488	\$ 67,416	-17.4%	\$ 55,686	7/1/2021	1/8/2022	.50%
2	County of Santa Clara	Assessment Clerk	\$ 52,915	\$ 63,792	-16.8%	\$ 53,075	6/14/2021	6/13/2022	3.00%
3	County of Alameda ¹	[Clerk II/ Assessor's Technician]	\$ 51,675	\$ 59,699	-11.4%	\$ 52,894	6/27/2021	6/26/2022	3.25%
4	County of San Bernardino	Records Technician Trainee/Records Technician	\$ 35,454	\$ 48,204	1.9%	\$ 49,120	7/31/2021	7/30/2022	3.00%
5	County of Orange	Assessment Technician Trainee	\$ 36,920	\$ 48,942	-2.0%	\$ 47,964	7/2/2021	7/1/2022	3.50%
6	County of Sacramento	Office Specialist I	\$ 38,190	\$ 46,416	0.1%	\$ 46,462	6/21/2020	unknown	unknown
8	County of Ventura	Records Technician I	\$ 31,271	\$ 43,689	-0.7%	\$ 43,383	12/27/2020	12/26/2021	2.00%
9	County of Kern	Assessment Technician	\$ 32,064	\$ 39,144	1.2%	\$ 39,614	4/21/2021	unknown	unknown
10	County of Contra Costa	N/C							
11	County of Riverside	N/C							
12	County of San Mateo	N/C							
13	County of Fresno	N/C							
14	County of Los Angeles	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 48,573	\$ 48,542
% County of San Diego Above/Below	-10.3%	-10.2%
Number of Matches	8	8

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Assistant Air Pollution Chemist*									
2	Bay Area Air Quality Management District	Air Quality Chemist I	\$ 83,450	\$ 101,434	-17.4%	\$ 83,785	11/8/2020	unknown	unknown
3	South Coast Air Quality Management District	Assistant Air Quality Chemist	\$ 63,624	\$ 85,488	-2.8%	\$ 83,094	1/1/2020	unknown	unknown
4	Sacramento Metropolitan Air Quality Management District	N/C							
5	County of Contra Costa	N/C							
6	County of Orange	N/C							
7	County of Ventura	N/C							
8	San Luis Obispo County Air Pollution Control District	N/C							
9	Imperial County Air Pollution Control District	N/C							
10	County of Sacramento	N/C							
11	City and County of San Francisco	N/C							
12	County of Santa Clara	N/C							
13	County of Los Angeles	N/C							
14	County of Fresno	N/C							
15	County of Kern	N/C							
16	County of Alameda	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 93,461	\$ 83,439
% County of San Diego Above/Below	-11.2%	0.7%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Assistant Air Resources Specialist*									
1	Sacramento Metropolitan Air Quality Management District	Air Quality Specialist (Assistant)	\$ 84,056	\$ 102,171	0.1%	\$ 102,273	7/1/2021	unknown	unknown
2	South Coast Air Quality Management District	Air Quality Engineer I	\$ 76,440	\$ 102,684	-2.8%	\$ 99,809	1/1/2020	unknown	unknown
3	Bay Area Air Quality Management District	Staff Specialist I	\$ 89,786	\$ 109,136	-17.4%	\$ 90,146	11/8/2020	unknown	unknown
5	County of Kern	Air Quality Specialist I	\$ 58,620	\$ 71,568	1.2%	\$ 72,427	4/21/2021	unknown	unknown
6	County of Orange	N/C							
7	County of Ventura	N/C							
8	County of Contra Costa	N/C							
9	San Luis Obispo County Air Pollution Control District	N/C							
10	Imperial County Air Pollution Control District	N/C							
11	County of Alameda	N/C							
12	City and County of San Francisco	N/C							
13	County of Santa Clara	N/C							
14	County of Los Angeles	N/C							
15	County of Fresno	N/C							
16	County of Sacramento	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 102,427	\$ 94,978
% County of San Diego Above/Below	-31.2%	-21.7%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Assistant Airport Manager									
1	County of Orange	Airport Maintenance Superintendent	\$ 85,030	\$ 114,587	-2.0%	\$ 112,295	7/2/2021	7/1/2022	3.50%
2	County of Ventura ¹	[Airport Operations Supervisor/ Deputy Director Airports]	\$ 80,511	\$ 112,784	-0.7%	\$ 111,995	unknown	unknown	unknown
3	County of Santa Clara	Assistant Director of County Airports	\$ 108,418	\$ 131,785	-16.8%	\$ 109,645	6/28/2021	6/27/2022	3.00%
4	County of Sacramento	Airport Operations Officer	\$ 87,487	\$ 96,466	0.1%	\$ 96,562	6/21/2020	unknown	unknown
5	County of Contra Costa	Airport Operations Manager	\$ 85,471	\$ 103,890	-11.1%	\$ 92,359	7/1/2021	unknown	unknown
6	County of Riverside	Airport Supervisor	\$ 59,372	\$ 87,913	1.9%	\$ 89,584	5/1/2021	5/1/2022	2.00%
8	County of San Mateo	Airport Operations Supervisor	\$ 84,072	\$ 105,059	-17.5%	\$ 86,674	10/4/2020	unknown	unknown
9	County of San Bernardino	Airport Operations Supervisor	\$ 61,381	\$ 84,365	1.9%	\$ 85,968	7/31/2021	7/30/2022	3.00%
10	County of Los Angeles	Assistant Airport Manager	\$ 48,913	\$ 65,912	-3.8%	\$ 63,407	1/1/2021	unknown	unknown
11	County of Alameda	N/C							
12	City and County of San Francisco	N/C							
13	County of Fresno	N/C							
14	County of Kern	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 103,890	\$ 92,359
% County of San Diego Above/Below	-19.8%	-6.5%
Number of Matches	9	9

N/C - Non Comparator

1 - County of Ventura: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Assistant APC Engineer*									
1	Sacramento Metropolitan Air Quality Management District	Air Quality Engineer (Assistant)	\$ 84,056	\$ 102,171	0.1%	\$ 102,273	7/1/2021	unknown	unknown
2	South Coast Air Quality Management District	Air Quality Engineer I	\$ 76,440	\$ 102,684	-2.8%	\$ 99,809	1/1/2020	unknown	unknown
3	San Luis Obispo County Air Pollution Control District	Air Pollution Control Engineer I	\$ 76,960	\$ 93,538	2.9%	\$ 96,250	7/1/2020	unknown	unknown
4	Bay Area Air Quality Management District	Air Quality Engineer I	\$ 94,276	\$ 114,593	-17.4%	\$ 94,654	11/8/2020	unknown	unknown
5	County of Kern	Air Quality Engineer I	\$ 72,648	\$ 88,692	1.2%	\$ 89,756	4/21/2021	unknown	unknown
7	Imperial County Air Pollution Control District	Air Pollution Control Engineer I	\$ 54,492	\$ 69,612	5.6%	\$ 73,510	7/3/2020	unknown	unknown
8	County of Ventura	N/C							
9	County of Orange	N/C							
10	County of Contra Costa	N/C							
11	County of Alameda	N/C							
12	City and County of San Francisco	N/C							
13	County of Santa Clara	N/C							
14	County of Los Angeles	N/C							
15	County of Fresno	N/C							
16	County of Sacramento	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 97,854	\$ 95,452
% County of San Diego Above/Below	-10.7%	-8.0%
Number of Matches	6	6

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Assistant Child Support Officer									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Child Support Officer I	\$ 69,108	\$ 83,976	-17.4%	\$ 69,364	7/1/2021	1/8/2022	.50%
2	County of Santa Clara	Child Support Specialist	\$ 61,412	\$ 74,187	-16.8%	\$ 61,724	6/14/2021	6/13/2022	3.00%
3	County of San Mateo	Child Support Specialist I	\$ 58,301	\$ 72,861	-17.5%	\$ 60,110	10/4/2020	unknown	unknown
4	County of Alameda	Child Support Specialist I	\$ 54,864	\$ 66,683	-11.4%	\$ 59,081	6/27/2021	6/26/2022	3.25%
5	County of Sacramento	Child Support Officer I	\$ 48,316	\$ 58,756	0.1%	\$ 58,815	6/21/2021	unknown	unknown
6	County of Riverside	Child Support Interviewer	\$ 36,610	\$ 57,168	1.9%	\$ 58,254	5/1/2021	5/1/2022	2.00%
7	County of Ventura	Child Support Services Specialist I	\$ 42,936	\$ 54,769	-0.7%	\$ 54,386	12/26/2020	12/27/2021	2.00%
8	County of Contra Costa	Child Support Specialist I	\$ 49,083	\$ 59,661	-11.1%	\$ 53,038	7/1/2021	unknown	unknown
9	County of San Bernardino	Child Support Officer Trainee	\$ 38,584	\$ 51,813	1.9%	\$ 52,797	7/31/2021	7/30/2022	3.00%
10	County of Los Angeles	Child Support Specialist I	\$ 39,760	\$ 53,450	-3.8%	\$ 51,419	1/1/2021	unknown	unknown
11	County of San Diego	Assistant Child Support Officer	\$ 38,397	\$ 47,216		\$ 47,216	6/18/2021	unknown	unknown
12	County of Kern	Child Support Specialist I	\$ 37,608	\$ 45,912	1.2%	\$ 46,463	4/21/2021	unknown	unknown
13	County of Fresno	Child Support Specialist I	\$ 34,450	\$ 41,886	4.7%	\$ 43,855	10/19/2020	unknown	unknown
14	County of Orange	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 57,962	\$ 56,320
% County of San Diego Above/Below	-22.8%	-19.3%
Number of Matches	12	12

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Assistant Division Chief, Assessor/Recorder/County Clerk									
1	County of Riverside	Principal Deputy Assessor-Clerk-Recorder	\$ 83,014	\$ 125,969	1.9%	\$ 128,363	7/1/2021	7/14/2022	2.00%
2	County of Los Angeles	Assistant Division Manager, Registrar-Recorder/County Clerk	\$ 97,794	\$ 131,790	-3.8%	\$ 126,782	1/1/2021	unknown	unknown
3	County of Orange	Managing Appraiser	\$ 92,893	\$ 125,070	-2.0%	\$ 122,569	7/2/2021	7/1/2022	3.50%
5	County of Sacramento	Assistant Deputy Clerk/Recorder	\$ 65,939	\$ 80,158	0.1%	\$ 80,238	6/21/2020	unknown	unknown
6	County of Ventura	N/C							
7	County of Contra Costa	N/C							
8	County of Alameda	N/C							
9	City and County of San Francisco	N/C							
10	County of Santa Clara	N/C							
11	County of Fresno	N/C							
12	County of Kern	N/C							
13	County of San Mateo	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 125,520	\$ 124,675
% County of San Diego Above/Below	-50.9%	-49.9%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Assistant Engineer									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Riverside	Assistant Civil Engineer	\$ 71,712	\$ 106,212	1.9%	\$ 108,230	5/1/2021	5/1/2022	2.00%
2	City and County of San Francisco	Assistant Engineer	\$ 105,120	\$ 127,764	-17.4%	\$ 105,533	7/1/2021	1/8/2022	.50%
3	County of Sacramento	Assistant Engineer - Civil II	\$ 81,996	\$ 104,630	0.1%	\$ 104,735	6/21/2020	unknown	unknown
4	County of Alameda ¹	[Junior Engineer/ Assistant Engineer]	\$ 92,175	\$ 106,662	-11.4%	\$ 94,503	2/7/2021	2/6/2022	3.50%
5	County of San Diego	Assistant Engineer	\$ 71,947	\$ 92,893		\$ 92,893	6/18/2021	unknown	unknown
6	County of San Bernardino	Engineer I	\$ 63,502	\$ 89,482	1.9%	\$ 91,182	3/13/2021	3/26/2022	3.00%
7	County of Orange	Junior Engineer/Architect	\$ 67,912	\$ 91,541	-2.0%	\$ 89,710	7/2/2021	7/1/2022	3.50%
8	County of San Mateo	Assistant Engineer	\$ 86,568	\$ 108,179	-17.5%	\$ 89,247	2/21/2021	unknown	unknown
9	County of Los Angeles	Civil Engineering Assistant	\$ 76,238	\$ 92,175	-3.8%	\$ 88,673	1/1/2021	unknown	unknown
10	County of Santa Clara	Junior Civil Engineer	\$ 87,464	\$ 106,142	-16.8%	\$ 88,310	10/21/2020	10/20/2021	3.00%
11	County of Ventura	Engineer I	\$ 56,570	\$ 85,221	-0.7%	\$ 84,624	1/10/2021	1/9/2022	2.00%
12	County of Contra Costa	Engineer - Entry Level	\$ 79,463	\$ 94,456	-11.1%	\$ 83,972	7/1/2021	unknown	unknown
13	County of Fresno	Engineer I	\$ 62,556	\$ 76,024	4.7%	\$ 79,597	1/11/2021	11/15/2021	3.00%
14	County of Kern	Engineer I	\$ 59,508	\$ 72,648	1.2%	\$ 73,520	4/21/2021	unknown	unknown

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 94,456	\$ 89,247
% County of San Diego Above/Below	-1.7%	3.9%
Number of Matches	13	13

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Assistant Health Physicist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Diego	Assistant Health Physicist	\$ 76,482	\$ 94,037		\$ 94,037	6/18/2021	unknown	unknown
2	County of Orange	N/C							
3	County of Ventura	N/C							
4	County of Contra Costa	N/C							
5	County of Sacramento	N/C							
6	City and County of San Francisco	N/C							
7	County of Santa Clara	N/C							
8	County of Los Angeles	N/C							
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of Alameda	N/C							
12	County of San Mateo	N/C							
13	County of San Bernardino	N/C							
14	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	N/A	N/A
% County of San Diego Above/Below	N/A	N/A
Number of Matches	0	0

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Assistant Manager, Sheriff's Food Services									
1	County of Riverside	Sheriff's Food Services Administrator	\$ 83,589	\$ 126,845	1.9%	\$ 129,255	7/1/2021	7/14/2022	2.00%
2	County of Los Angeles	Assistant Manager, Food Services, Sheriff	\$ 91,043	\$ 122,688	-3.8%	\$ 118,026	1/1/2021	unknown	unknown
3	County of Santa Clara	Assistant Director, Food Services	\$ 104,753	\$ 127,363	-16.8%	\$ 105,966	6/28/2021	6/27/2022	3.00%
5	County of Sacramento	Food Service Program Manager	\$ 84,021	\$ 92,624	0.1%	\$ 92,717	6/21/2020	unknown	unknown
6	County of San Bernardino	Sheriff's Food Services Manager	\$ 65,998	\$ 90,750	1.9%	\$ 92,475	7/31/2021	7/30/2022	3.00%
7	County of Contra Costa ¹	[Head Detention Cook/Sheriff's Director of Food Services]	\$ 83,106	\$ 96,999	-11.1%	\$ 86,232	7/1/2021	unknown	Unknown
8	County of Alameda	Food and Support Services Manager	\$ 77,189	\$ 93,746	-11.4%	\$ 83,059	12/27/2020	12/26/2021	3.00%
9	County of San Mateo	Food Service Unit Manager	\$ 70,843	\$ 88,585	-17.5%	\$ 73,083	12/13/2020	unknown	unknown
10	County of Ventura	Supervisor - Sheriff Food Services	\$ 57,981	\$ 73,133	-0.7%	\$ 72,621	12/26/2020	12/27/2021	2.00%
11	County of Orange	N/C							
12	City and County of San Francisco	N/C							
13	County of Fresno	N/C							
14	County of Kern	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 93,746	\$ 92,475
% County of San Diego Above/Below	2.4%	3.7%
Number of Matches	9	9

N/C - Non Comparator

1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Assistant Meteorologist									
1	South Coast Air Quality Management District	Meteorologist	\$ 79,752	\$ 107,167	-2.8%	\$ 104,167	1/1/2020	unknown	unknown
2	Bay Area Air Quality Management District	Air Quality Meteorologist I	\$ 92,004	\$ 111,831	-17.4%	\$ 92,372	11/8/2020	unknown	Unknown
4	Sacramento Metropolitan Air Quality Management District	N/C							
5	County of Contra Costa	N/C							
6	County of Orange	N/C							
7	County of Ventura	N/C							
8	San Luis Obispo County Air Pollution Control District	N/C							
9	Imperial County Air Pollution Control District	N/C							
10	County of Sacramento	N/C							
11	City and County of San Francisco	N/C							
12	County of Santa Clara	N/C							
13	County of Los Angeles	N/C							
14	County of Fresno	N/C							
15	County of Kern	N/C							
16	County of Alameda	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 109,499	\$ 98,270
% County of San Diego Above/Below	-28.4%	-15.3%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Assistant Procurement Specialist									
1	City and County of San Francisco	Assistant Purchaser	\$ 70,440	\$ 85,692	-17.4%	\$ 70,782	7/1/2021	1/8/2022	.50%
2	County of Alameda ¹	[Procurement and Contracts Assistant/ Procurement and Contracts Specialist I]	\$ 67,217	\$ 78,702	-11.4%	\$ 69,730	6/27/2021	6/26/2022	3.25%
3	County of San Mateo	Buyer I	\$ 66,205	\$ 82,762	-17.5%	\$ 68,278	10/4/2020	unknown	unknown
4	County of Riverside	Senior Buyer Assistant	\$ 42,683	\$ 66,649	1.9%	\$ 67,915	5/1/2021	5/1/2022	2.00%
5	County of Ventura	Buyer	\$ 48,126	\$ 67,345	-0.7%	\$ 66,873	12/27/2020	12/26/2021	2.00%
6	County of San Bernardino	Buyer I	\$ 45,739	\$ 61,381	1.9%	\$ 62,547	7/31/2021	7/30/2022	3.00%
7	County of Fresno	Purchasing Analyst I	\$ 48,776	\$ 59,306	4.7%	\$ 62,093	4/19/2021	unknown	unknown
9	County of Orange	Procurement Buyer Trainee	\$ 44,366	\$ 59,738	-2.0%	\$ 58,543	7/2/2021	7/1/2022	3.50%
10	County of Santa Clara	Buyer Assistant	\$ 55,517	\$ 67,009	-16.8%	\$ 55,752	6/14/2021	6/13/2022	3.00%
11	County of Sacramento	Contract Services Specialist I	\$ 43,117	\$ 52,388	0.1%	\$ 52,440	6/21/2020	unknown	unknown
12	County of Kern	Buyer I	\$ 35,784	\$ 43,680	1.2%	\$ 44,204	4/21/2021	unknown	unknown
13	County of Contra Costa	N/C							
14	County of Los Angeles	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 66,649	\$ 62,547
% County of San Diego Above/Below	-10.6%	-3.8%
Number of Matches	11	11

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Assistant Real Property Agent									
1	County of Orange	Real Property Agent II	\$ 63,586	\$ 85,717	-2.0%	\$ 84,003	7/2/2021	7/1/2022	3.50%
2	County of Ventura ¹	[Real Property Agent I/ Real Property Agent II]	\$ 57,603	\$ 81,199	-0.7%	\$ 80,630	12/27/2020	12/26/2021	2.00%
3	County of Sacramento	Real Estate Officer I	\$ 65,814	\$ 79,991	0.1%	\$ 80,071	6/21/2020	unknown	unknown
4	County of Los Angeles	Real Property Agent I	\$ 62,134	\$ 79,302	-3.8%	\$ 76,288	1/1/2021	unknown	unknown
5	County of Santa Clara	Assistant Real Estate Agent	\$ 72,933	\$ 88,207	-16.8%	\$ 73,388	6/14/2021	6/13/2022	3.00%
6	County of Contra Costa	Assistant Real Property Agent	\$ 65,550	\$ 79,677	-11.1%	\$ 70,833	7/1/2021	unknown	Unknown
8	County of Riverside	Real Property Agent I	\$ 39,882	\$ 58,957	1.9%	\$ 60,078	5/1/2021	5/1/2022	2.00%
9	County of Kern	Real Property Agent I	\$ 41,976	\$ 51,240	1.2%	\$ 51,855	4/21/2021	unknown	unknown
10	County of Alameda	N/C							
11	City and County of San Francisco	N/C							
12	County of Fresno	N/C							
13	County of San Bernardino	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 79,834	\$ 74,838
% County of San Diego Above/Below	-18.8%	-11.3%
Number of Matches	8	8

N/C - Non Comparator

1 - County of Ventura: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Assistant Surveyor									
1	County of Los Angeles	Survey Party Chief II	\$ 91,717	\$ 117,064	-3.8%	\$ 112,616	1/1/2021	unknown	unknown
2	County of Alameda ¹	[Survey Technician III/ Land Surveyor]	\$ 109,179	\$ 120,983	-11.4%	\$ 107,191	10/4/2020	10/3/2021	3.25%
3	County of Sacramento	Assistant Land Surveyor	\$ 81,996	\$ 104,630	0.1%	\$ 104,735	6/21/2020	unknown	unknown
4	City and County of San Francisco	Survey Associate	\$ 101,112	\$ 122,928	-17.4%	\$ 101,539	7/1/2021	1/8/2022	.50%
6	County of Orange	Surveyor I	\$ 59,738	\$ 80,538	-2.0%	\$ 78,927	7/2/2021	7/1/2022	3.50%
7	County of Kern	Engineer I	\$ 59,508	\$ 72,648	1.2%	\$ 73,520	4/21/2021	unknown	unknown
8	County of Ventura	N/C							
9	County of Contra Costa	N/C							
10	County of Riverside	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Fresno	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 110,847	\$ 103,137
% County of San Diego Above/Below	-19.3%	-11.0%
Number of Matches	6	6

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Assistant Transportation Specialist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Diego	Assistant Transportation Specialist	\$ 74,672	\$ 91,832		\$ 91,832	6/18/2021	unknown	unknown
2	County of San Mateo	Associate Management Analyst	\$ 86,152	\$ 107,679	-17.5%	\$ 88,836	12/13/2020	unknown	unknown
3	County of San Bernardino	Transportation Analyst I	\$ 59,883	\$ 82,326	1.9%	\$ 83,891	7/31/2021	7/30/2022	3.00%
4	County of Santa Clara	Assistant Planner	\$ 78,684	\$ 95,260	-16.8%	\$ 79,256	6/14/2021	6/13/2022	3.00%
5	County of Alameda	Junior Transportation Planner	\$ 67,267	\$ 81,640	-11.4%	\$ 72,333	2/7/2021	2/6/2022	3.50%
6	County of Kern	Planner I	\$ 50,988	\$ 62,244	1.2%	\$ 62,991	4/21/2021	unknown	unknown
7	County of Ventura	N/C							
8	County of Orange	N/C							
9	County of Contra Costa	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of Fresno	N/C							
13	County of Los Angeles	N/C							
14	City and County of San Francisco	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 82,326	\$ 79,256
% County of San Diego Above/Below	10.4%	13.7%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Assistant Weapons Coordinator									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Riverside	Armorer	\$ 45,491	\$ 71,070	1.9%	\$ 72,420	5/1/2021	5/1/2022	2.00%
2	County of Orange	Weapons Instructor, Sheriff	\$ 54,808	\$ 73,403	-2.0%	\$ 71,935	7/2/2021	7/1/2022	3.50%
3	County of San Diego	Assistant Weapons Coordinator	\$ 58,282	\$ 71,573		\$ 71,573	6/18/2021	unknown	unknown
4	County of Santa Clara	Rangemaster I - U	\$ 64,686	\$ 78,127	-16.8%	\$ 65,002	6/14/2021	6/13/2022	3.00%
5	County of Ventura	N/C							
6	County of Contra Costa	N/C							
7	County of Alameda	N/C							
8	City and County of San Francisco	N/C							
9	County of Los Angeles	N/C							
10	County of Fresno	N/C							
11	County of Kern	N/C							
12	County of Sacramento	N/C							
13	County of San Mateo	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 73,403	\$ 71,935
% County of San Diego Above/Below	-2.6%	-0.5%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Associate Accountant									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Orange	Accountant/Auditor II	\$ 64,418	\$ 86,840	-2.0%	\$ 85,103	7/2/2021	7/1/2022	3.50%
2	City and County of San Francisco	Accountant II	\$ 83,232	\$ 101,064	-17.4%	\$ 83,479	7/1/2021	1/8/2022	.50%
3	County of Ventura	Accountant II	\$ 59,125	\$ 82,775	-0.7%	\$ 82,196	12/27/2020	12/26/2021	2.00%
4	County of Sacramento	Accountant	\$ 65,960	\$ 80,179	0.1%	\$ 80,259	6/21/2020	unknown	unknown
5	County of San Mateo	Accountant II	\$ 75,918	\$ 94,888	-17.5%	\$ 78,282	10/4/2020	unknown	unknown
6	County of Santa Clara	Accountant II - U	\$ 75,119	\$ 90,852	-16.8%	\$ 75,589	6/14/2021	6/13/2022	3.00%
7	County of Riverside	Accountant II	\$ 49,234	\$ 72,884	1.9%	\$ 74,269	5/1/2021	5/1/2022	2.00%
8	County of San Bernardino	Accountant II	\$ 52,978	\$ 72,800	1.9%	\$ 74,183	7/31/2021	7/30/2022	3.00%
9	County of San Diego	Associate Accountant	\$ 60,278	\$ 74,110		\$ 74,110	6/18/2021	unknown	unknown
10	County of Contra Costa	Accountant II	\$ 67,929	\$ 82,568	-11.1%	\$ 73,403	7/1/2021	unknown	Unknown
11	County of Alameda	Accountant	\$ 75,179	\$ 82,085	-11.4%	\$ 72,728	6/27/2021	6/26/2022	3.25%
12	County of Los Angeles	Accountant II	\$ 54,648	\$ 73,644	-3.8%	\$ 70,846	1/1/2021	unknown	unknown
13	County of Fresno	Accountant II	\$ 53,170	\$ 64,610	4.7%	\$ 67,647	10/17/2019	unknown	unknown
14	County of Kern	Accountant II	\$ 48,744	\$ 59,508	1.2%	\$ 60,222	4/21/2021	unknown	unknown

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 82,085	\$ 74,269
% County of San Diego Above/Below	-10.8%	-0.2%
Number of Matches	13	13

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Associate Air Pollution Chemist*									
1	South Coast Air Quality Management District	Air Quality Chemist	\$ 76,440	\$ 102,684	-2.8%	\$ 99,809	1/1/2020	unknown	unknown
3	Bay Area Air Quality Management District	Air Quality Chemist II	\$ 92,004	\$ 111,831	-17.4%	\$ 92,372	11/8/2020	unknown	Unknown
4	Sacramento Metropolitan Air Quality Management District	N/C							
5	County of Orange	N/C							
6	County of Ventura	N/C							
7	County of Contra Costa	N/C							
8	San Luis Obispo County Air Pollution Control District	N/C							
9	Imperial County Air Pollution Control District	N/C							
10	County of Sacramento	N/C							
11	City and County of San Francisco	N/C							
12	County of Santa Clara	N/C							
13	County of Los Angeles	N/C							
14	County of Fresno	N/C							
15	County of Kern	N/C							
16	County of Alameda	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 107,258	\$ 96,091
% County of San Diego Above/Below	-10.2%	1.3%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Associate Air Pollution Control Engineer*									
1	Sacramento Metropolitan Air Quality Management District	Air Quality Engineer (Associate)	\$ 97,627	\$ 118,666	0.1%	\$ 118,785	7/1/2021	unknown	unknown
2	San Luis Obispo County Air Pollution Control District	Air Pollution Control Engineer II	\$ 86,278	\$ 104,874	2.9%	\$ 107,915	7/1/2020	unknown	unknown
3	South Coast Air Quality Management District	Air Quality Engineer II	\$ 80,952	\$ 108,780	-2.8%	\$ 105,734	1/1/2020	unknown	unknown
4	Bay Area Air Quality Management District	Air Quality Engineer II	\$ 103,939	\$ 126,339	-17.4%	\$ 104,356	11/8/2020	unknown	Unknown
5	County of Kern	Air Quality Engineer II	\$ 84,372	\$ 102,996	1.2%	\$ 104,232	4/21/2021	unknown	unknown
7	Imperial County Air Pollution Control District	Air Pollution Control Engineer II	\$ 57,396	\$ 73,308	5.6%	\$ 77,413	7/3/2020	unknown	unknown
8	County of Ventura	N/C							
9	County of Orange	N/C							
10	County of Contra Costa	N/C							
11	County of Alameda	N/C							
12	City and County of San Francisco	N/C							
13	County of Santa Clara	N/C							
14	County of Los Angeles	N/C							
15	County of Fresno	N/C							
16	County of Sacramento	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 106,827	\$ 105,045
% County of San Diego Above/Below	-4.1%	-2.4%
Number of Matches	6	6

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Associate Air Resources Specialist*									
1	Sacramento Metropolitan Air Quality Management District	Air Quality Specialist (Associate)	\$ 97,627	\$ 118,666	0.1%	\$ 118,785	7/1/2021	unknown	unknown
2	South Coast Air Quality Management District	Air Quality Engineer II	\$ 80,952	\$ 108,780	-2.8%	\$ 105,734	1/1/2020	unknown	unknown
3	Bay Area Air Quality Management District	Staff Specialist II	\$ 98,990	\$ 120,322	-17.4%	\$ 99,386	11/8/2020	unknown	Unknown
5	County of Kern	Air Quality Specialist II	\$ 64,776	\$ 79,080	1.2%	\$ 80,029	4/21/2021	unknown	unknown
6	County of Orange	N/C							
7	County of Ventura	N/C							
8	County of Contra Costa	N/C							
9	San Luis Obispo County Air Pollution Control District	N/C							
10	Imperial County Air Pollution Control District	N/C							
11	County of Alameda	N/C							
12	City and County of San Francisco	N/C							
13	County of Santa Clara	N/C							
14	County of Los Angeles	N/C							
15	County of Fresno	N/C							
16	County of Sacramento	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 113,723	\$ 102,560
% County of San Diego Above/Below	-28.6%	-15.9%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Associate Health Physicist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Diego	Associate Health Physicist	\$ 89,690	\$ 110,157		\$ 110,157	6/18/2021	unknown	unknown
2	County of Los Angeles	Health Physicist	\$ 76,616	\$ 103,240	-3.8%	\$ 99,317	1/1/2021	unknown	unknown
3	County of Orange	N/C							
4	County of Ventura	N/C							
5	County of Contra Costa	N/C							
6	County of Alameda	N/C							
7	City and County of San Francisco	N/C							
8	County of Santa Clara	N/C							
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of Sacramento	N/C							
12	County of San Mateo	N/C							
13	County of San Bernardino	N/C							
14	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 103,240	\$ 99,317
% County of San Diego Above/Below	6.3%	9.8%
Number of Matches	1	1

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Associate Meteorologist									
1	South Coast Air Quality Management District	Meteorologist	\$ 79,752	\$ 107,167	-2.8%	\$ 104,167	1/1/2020	unknown	unknown
2	Bay Area Air Quality Management District	Air Quality Meteorologist II	\$ 101,434	\$ 123,294	-17.4%	\$ 101,841	11/8/2020	unknown	Unknown
4	Sacramento Metropolitan Air Quality Management District	N/C							
5	County of Contra Costa	N/C							
6	County of Orange	N/C							
7	County of Ventura	N/C							
8	San Luis Obispo County Air Pollution Control District	N/C							
9	Imperial County Air Pollution Control District	N/C							
10	County of Sacramento	N/C							
11	City and County of San Francisco	N/C							
12	County of Santa Clara	N/C							
13	County of Los Angeles	N/C							
14	County of Fresno	N/C							
15	County of Kern	N/C							
16	County of Alameda	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 115,231	\$ 103,004
% County of San Diego Above/Below	-16.7%	-4.3%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Associate Real Property Agent									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Real Property Officer	\$ 107,928	\$ 131,124	-17.4%	\$ 108,308	7/1/2021	1/8/2022	.50%
2	County of Orange	Real Property Agent III	\$ 74,589	\$ 100,485	-2.0%	\$ 98,475	7/2/2021	7/1/2022	3.50%
3	County of San Mateo	Real Property Agent II	\$ 95,137	\$ 118,911	-17.5%	\$ 98,102	10/4/2020	unknown	unknown
4	County of Sacramento	Real Estate Officer II	\$ 78,947	\$ 95,964	0.1%	\$ 96,060	6/21/2020	unknown	unknown
5	County of Los Angeles	Real Property Agent II	\$ 75,119	\$ 95,884	-3.8%	\$ 92,241	1/1/2021	unknown	unknown
6	County of Santa Clara	Real Estate Agent	\$ 91,272	\$ 110,448	-16.8%	\$ 91,893	6/14/2021	6/13/2022	3.00%
7	County of Contra Costa	Associate Real Property Agent	\$ 77,952	\$ 99,489	-11.1%	\$ 88,445	7/1/2021	unknown	Unknown
8	County of San Bernardino	Real Property Agent II	\$ 61,381	\$ 84,365	1.9%	\$ 85,968	7/31/2021	7/30/2022	3.00%
9	County of Ventura	Real Property Agent II	\$ 61,266	\$ 85,046	-0.7%	\$ 84,450	12/27/2020	12/26/2021	2.00%
10	County of San Diego	Associate Real Property Agent	\$ 67,704	\$ 83,242		\$ 83,242	6/18/2021	unknown	unknown
11	County of Riverside	Real Property Agent II	\$ 48,439	\$ 71,710	1.9%	\$ 73,072	5/1/2021	5/1/2022	2.00%
12	County of Kern	Real Property Agent II	\$ 47,304	\$ 57,756	1.2%	\$ 58,449	4/21/2021	unknown	unknown
13	County of Fresno	N/C							
14	County of Alameda	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 95,964	\$ 91,893
% County of San Diego Above/Below	-15.3%	-10.4%
Number of Matches	11	11

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Associate Transportation Specialist									
1	County of Riverside	Associate Transportation Planner	\$ 75,476	\$ 111,781	1.9%	\$ 113,905	5/1/2021	5/1/2022	2.00%
2	County of San Mateo	Senior Management Analyst	\$ 109,926	\$ 137,444	-17.5%	\$ 113,391	12/13/2020	unknown	unknown
4	County of Contra Costa	Transportation Planner	\$ 99,156	\$ 120,525	-11.1%	\$ 107,147	7/1/2021	unknown	Unknown
5	County of San Bernardino	Transportation Analyst II	\$ 65,998	\$ 90,750	1.9%	\$ 92,475	7/31/2021	7/30/2022	3.00%
6	City and County of San Francisco	Transportation Planner II	\$ 91,704	\$ 111,492	-17.4%	\$ 92,092	7/1/2021	1/8/2022	.50%
7	County of Santa Clara	Associate Planner	\$ 88,647	\$ 107,305	-16.8%	\$ 89,278	6/14/2021	6/13/2022	3.00%
8	County of Ventura	Transportation Analyst	\$ 62,153	\$ 87,193	-0.7%	\$ 86,582	12/27/2020	12/26/2021	2.00%
9	County of Alameda	Assistant Transportation Planner	\$ 80,080	\$ 97,386	-11.4%	\$ 86,284	2/7/2021	2/6/2022	3.50%
10	County of Kern	Planner II	\$ 53,592	\$ 65,424	1.2%	\$ 66,209	4/21/2021	unknown	unknown
11	County of Fresno	N/C							
12	County of Los Angeles	N/C							
13	County of Orange	N/C							
14	County of Sacramento	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 107,305	\$ 92,092
% County of San Diego Above/Below	1.1%	15.1%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Audit-Appraiser I									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Ventura	Auditor-Appraiser I	\$ 53,556	\$ 74,907	-0.7%	\$ 74,382	1/10/2021	1/9/2022	2.00%
2	County of Contra Costa	Auditor - Appraiser I	\$ 73,914	\$ 81,490	-11.1%	\$ 72,444	7/1/2021	unknown	unknown
3	County of San Diego	Audit Appraiser I	\$ 64,709	\$ 72,093		\$ 72,093	6/18/2021	unknown	unknown
4	County of San Bernardino	Auditor-Appraiser I	\$ 51,771	\$ 69,306	1.9%	\$ 70,622	7/31/2021	7/30/2022	3.00%
5	County of Riverside	Auditor/Appraiser I	\$ 46,800	\$ 69,252	1.9%	\$ 70,568	5/1/2021	5/1/2022	2.00%
6	County of Santa Clara	Auditor Appraiser I	\$ 69,499	\$ 83,938	-16.8%	\$ 69,837	6/14/2021	6/13/2022	3.00%
7	County of Orange	Auditor-Appraiser Trainee	\$ 51,459	\$ 68,890	-2.0%	\$ 67,512	7/2/2021	7/1/2022	3.50%
8	County of Alameda	Auditor-Appraiser I	\$ 68,032	\$ 74,253	-11.4%	\$ 65,788	6/27/2021	6/26/2022	3.25%
9	County of San Mateo ¹	Auditor-Appraiser I	\$ 71,343	\$ 79,725	-17.5%	\$ 65,773	10/4/2020	unknown	unknown
10	County of Sacramento	Auditor Appraiser I	\$ 53,160	\$ 61,533	0.1%	\$ 61,595	6/21/2020	unknown	unknown
11	County of Fresno	Auditor-Appraiser I	\$ 43,342	\$ 52,702	4.7%	\$ 55,179	10/17/2019	unknown	unknown
12	County of Kern	Auditor-Appraiser I	\$ 43,248	\$ 52,800	1.2%	\$ 53,434	4/21/2021	unknown	unknown
13	City and County of San Francisco	N/C							
14	County of Los Angeles	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 69,306	\$ 67,512
% County of San Diego Above/Below	3.9%	6.4%
Number of Matches	11	11

N/C - Non Comparator

1 - County of San Mateo: Bottom of range is step 3.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Audit-Appraiser II									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Tax Auditor-Appraiser	\$ 89,028	\$ 108,216	-17.4%	\$ 89,386	7/1/2021	1/8/2022	.50%
2	County of San Bernardino	Auditor-Appraiser II	\$ 62,421	\$ 85,842	1.9%	\$ 87,473	7/31/2021	7/30/2022	3.00%
3	County of Ventura	Auditor-Appraiser II	\$ 61,761	\$ 86,580	-0.7%	\$ 85,974	1/10/2021	1/9/2022	2.00%
4	County of Riverside	Auditor/Appraiser II	\$ 55,092	\$ 81,552	1.9%	\$ 83,101	5/1/2021	5/1/2022	2.00%
5	County of San Diego	Audit Appraiser II	\$ 66,997	\$ 82,368		\$ 82,368	6/18/2021	unknown	unknown
6	County of San Mateo	Auditor-Appraiser II	\$ 78,851	\$ 98,590	-17.5%	\$ 81,337	10/4/2020	unknown	unknown
7	County of Santa Clara	Auditor Appraiser II	\$ 80,361	\$ 97,221	-16.8%	\$ 80,888	6/14/2021	6/13/2022	3.00%
8	County of Alameda	Auditor-Appraiser II	\$ 75,924	\$ 90,884	-11.4%	\$ 80,523	6/27/2021	6/26/2022	3.25%
9	County of Contra Costa	Auditor - Appraiser II	\$ 74,428	\$ 90,468	-11.1%	\$ 80,426	7/1/2021	unknown	unknown
10	County of Orange	Auditor-Appraiser I	\$ 60,258	\$ 81,182	-2.0%	\$ 79,559	7/2/2021	7/1/2022	3.50%
11	County of Sacramento	Auditor Appraiser II	\$ 61,095	\$ 74,249	0.1%	\$ 74,323	6/21/2020	unknown	unknown
12	County of Fresno	Auditor-Appraiser II	\$ 50,024	\$ 60,788	4.7%	\$ 63,645	10/17/2019	unknown	unknown
13	County of Kern	Auditor-Appraiser II	\$ 48,744	\$ 59,508	1.2%	\$ 60,222	4/21/2021	unknown	unknown
14	County of Los Angeles	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 86,211	\$ 80,706
% County of San Diego Above/Below	-4.7%	2.0%
Number of Matches	12	12

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Audit-Appraiser III									
1	City and County of San Francisco	Senior Tax Auditor-Appraiser	\$ 103,092	\$ 125,292	-17.4%	\$ 103,491	7/1/2021	1/8/2022	.50%
2	County of San Bernardino	Auditor-Appraiser III	\$ 67,142	\$ 92,373	1.9%	\$ 94,128	7/31/2021	7/30/2022	3.00%
4	County of Alameda	Auditor-Appraiser III	\$ 86,152	\$ 103,729	-11.4%	\$ 91,904	6/27/2021	6/26/2022	3.25%
5	County of Ventura ³	[Auditor-Appraiser II/ Auditor-Appraiser III]	\$ 64,314	\$ 91,334	-0.7%	\$ 90,695	1/10/2021	1/9/2022	2.00%
6	County of Santa Clara	Auditor Appraiser III	\$ 88,155	\$ 106,667	-16.8%	\$ 88,747	6/14/2021	6/13/2022	3.00%
7	County of Orange	Auditor-Appraiser II	\$ 67,246	\$ 90,522	-2.0%	\$ 88,711	7/2/2021	7/1/2022	3.50%
8	County of Contra Costa ¹	[Auditor - Appraiser II/Senior Auditor - Appraiser]	\$ 81,163	\$ 98,654	-11.1%	\$ 87,703	7/1/2021	unknown	unknown
9	County of Sacramento	Associate Auditor Appraiser	\$ 71,723	\$ 87,174	0.1%	\$ 87,261	6/21/2020	unknown	unknown
10	County of San Mateo ²	[Auditor-Appraiser II/Senior Auditor-Appraiser]	\$ 84,197	\$ 105,267	-17.5%	\$ 86,845	10/4/2020	unknown	unknown
11	County of Fresno	Auditor-Appraiser III	\$ 58,968	\$ 71,656	4.7%	\$ 75,024	10/17/2019	unknown	unknown
12	County of Kern	Auditor-Appraiser III	\$ 58,620	\$ 71,568	1.2%	\$ 72,427	4/21/2021	unknown	unknown
13	County of Los Angeles	N/C							
14	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 92,373	\$ 88,711
% County of San Diego Above/Below	0.8%	4.7%
Number of Matches	11	11

N/C - Non Comparator

- 1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.
- 2 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.
- 3 - County of Ventura: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Audit-Appraiser IV									
2	County of Santa Clara	Senior Auditor Appraiser	\$ 98,883	\$ 119,658	-16.8%	\$ 99,556	6/14/2021	6/13/2022	3.00%
3	County of Orange	Auditor-Appraiser III	\$ 74,589	\$ 100,485	-2.0%	\$ 98,475	7/2/2021	7/1/2022	3.50%
4	County of Sacramento	Senior Auditor Appraiser	\$ 78,947	\$ 95,964	0.1%	\$ 96,060	6/21/2020	unknown	unknown
5	County of Ventura	Auditor-Appraiser III	\$ 66,868	\$ 96,088	-0.7%	\$ 95,416	1/10/2021	1/9/2022	2.00%
6	County of Contra Costa	Senior Auditor-Appraiser	\$ 87,898	\$ 106,840	-11.1%	\$ 94,981	7/1/2021	unknown	Unknown
7	County of San Mateo ¹	Senior Auditor-Appraiser	\$ 89,542	\$ 111,943	-17.5%	\$ 92,353	10/4/2020	unknown	unknown
8	County of Riverside	Senior Auditor/Appraiser	\$ 59,883	\$ 88,618	1.9%	\$ 90,302	5/1/2021	5/1/2022	2.00%
9	City and County of San Francisco	N/C							
10	County of Alameda	N/C							
11	County of Fresno	N/C							
12	County of Kern	N/C							
13	County of Los Angeles	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 100,485	\$ 95,416
% County of San Diego Above/Below	1.8%	6.8%
Number of Matches	7	7

N/C - Non Comparator

1 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Biostatistician									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Los Angeles	Data Scientist	\$ 100,478	\$ 135,409	-3.8%	\$ 130,264	1/1/2021	unknown	unknown
2	County of San Diego	Biostatistician	\$ 71,594	\$ 87,942		\$ 87,942	6/18/2021	unknown	unknown
3	City and County of San Francisco	Statistician	\$ 82,810	\$ 100,646	-17.4%	\$ 83,134	7/1/2021	1/8/2022	.50%
4	County of Orange	Research Analyst II	\$ 54,330	\$ 72,717	-2.0%	\$ 71,262	7/2/2021	7/1/2022	3.50%
5	County of Riverside	Statistician	\$ 40,730	\$ 60,226	1.9%	\$ 61,370	5/1/2021	5/1/2022	2.00%
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 86,681	\$ 77,198
% County of San Diego Above/Below	1.4%	12.2%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Broadcast Engineer									
1	County of Los Angeles	Telecommunications Systems Engineer	\$ 117,357	\$ 127,317	-3.8%	\$ 122,479	1/1/2021	unknown	unknown
2	County of Santa Clara	Multimedia Technician	\$ 101,236	\$ 123,055	-16.8%	\$ 102,382	6/14/2021	6/13/2022	3.00%
3	County of Riverside	RCIT Voice Engineer II	\$ 64,813	\$ 97,915	1.9%	\$ 99,776	5/1/2021	5/1/2022	2.00%
4	County of Orange	Telecommunications Engineer II	\$ 73,528	\$ 99,050	-2.0%	\$ 97,069	7/2/2021	7/1/2022	3.50%
6	County of Ventura	Digital Systems Electronics Technician II	\$ 66,898	\$ 84,316	-0.7%	\$ 83,726	1/10/2021	1/9/2022	2.00%
7	County of Kern	Broadcast Engineer	\$ 56,052	\$ 68,424	1.2%	\$ 69,245	4/21/2021	unknown	unknown
8	City and County of San Francisco	N/C							
9	County of Alameda	N/C							
10	County of Contra Costa	N/C							
11	County of Fresno	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 98,482	\$ 98,422
% County of San Diego Above/Below	-3.5%	-3.4%
Number of Matches	6	6

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Building Maintenance Supervisor									
1	City and County of San Francisco	Buildings And Grounds Maintenance Supervisor	\$ 136,764	\$ 136,764	-17.4%	\$ 112,967	7/1/2021	1/8/2022	.50%
2	County of Alameda	Supervisor, Building and Plant Maintenance	\$ 125,694	\$ 125,694	-11.4%	\$ 111,365	12/27/2020	unknown	unknown
3	County of Santa Clara	Maintenance Project Manager	\$ 107,879	\$ 131,188	-16.8%	\$ 109,148	6/28/2021	6/27/2022	3.00%
4	County of Sacramento	Senior Stationary Engineer	\$ 89,366	\$ 108,639	0.1%	\$ 108,748	6/21/2020	unknown	unknown
5	County of Contra Costa	Facilities Maintenance Supervisor	\$ 96,064	\$ 116,766	-11.1%	\$ 103,805	7/1/2021	unknown	unknown
6	County of San Mateo	Crafts Supervisor	\$ 99,069	\$ 123,882	-17.5%	\$ 102,203	2/7/2021	2/6/2022	2-4%
7	County of Orange	Senior Maintenance Inspector	\$ 74,235	\$ 100,027	-2.0%	\$ 98,027	7/2/2021	7/1/2022	3.50%
8	County of Ventura ¹	[Maintenance Engineer/ Manager - Facilities Maintenance]	\$ 75,262	\$ 94,946	-0.7%	\$ 94,281	unknown	unknown	unknown
9	County of Fresno	Facilities Services Supervisor	\$ 69,082	\$ 84,006	4.7%	\$ 87,954	4/19/2021	unknown	unknown
10	County of Riverside	Building Maintenance Supervisor	\$ 57,101	\$ 84,526	1.9%	\$ 86,132	5/1/2021	5/1/2022	2.00%
11	County of San Bernardino	Maintenance Supervisor	\$ 60,923	\$ 83,741	1.9%	\$ 85,332	7/31/2021	7/30/2022	3.00%
13	County of Los Angeles	Head, Building Maintenance, Public Works	\$ 60,615	\$ 81,681	-3.8%	\$ 78,577	1/1/2021	unknown	unknown
14	County of Kern	Maintenance Supervisor	\$ 50,232	\$ 61,320	1.2%	\$ 62,056	4/21/2021	unknown	unknown

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 100,027	\$ 98,027
% County of San Diego Above/Below	-17.3%	-15.0%
Number of Matches	13	13

N/C - Non Comparator

1 - County of Ventura: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Building/Enforcement Supervisor									
1	City and County of San Francisco	Senior Building Inspector	\$ 127,428	\$ 154,860	-17.4%	\$ 127,914	7/1/2021	1/8/2022	.50%
2	County of Alameda ¹	[Supervising Plans Checker/ Senior Code Enforcement Investigator]	\$ 115,253	\$ 139,942	-11.4%	\$ 123,989	12/27/2020	unknown	unknown
3	County of Riverside	Supervising Code Enforcement Officer	\$ 74,963	\$ 120,277	1.9%	\$ 122,562	5/1/2021	5/1/2022	2.00%
4	County of Santa Clara	Code Enforcement Program Manager	\$ 119,529	\$ 145,298	-16.8%	\$ 120,888	6/28/2021	6/27/2022	3.00%
5	County of Sacramento	Supervising Building Inspector	\$ 88,844	\$ 107,991	0.1%	\$ 108,099	6/21/2020	unknown	unknown
6	County of San Mateo ³	[Senior Code Compliance Officer/Assistant Building Inspector Manager]	\$ 104,747	\$ 130,923	-17.5%	\$ 108,011	12/13/2020	unknown	unknown
7	County of Orange	Senior Building Inspector	\$ 77,958	\$ 104,749	-2.0%	\$ 102,654	7/2/2021	7/1/2022	3.50%
9	County of San Bernardino	Regional Building Inspector Supervisor	\$ 69,243	\$ 95,326	1.9%	\$ 97,138	7/31/2021	7/30/2022	3.00%
10	County of Fresno	Supervising Building Inspector	\$ 70,330	\$ 85,488	4.7%	\$ 89,506	4/19/2021	unknown	unknown
11	County of Kern ²	[Supervising Building Inspector / Code Compliance Supervisor]	\$ 58,920	\$ 71,928	1.2%	\$ 72,791	4/21/2021	unknown	unknown
12	County of Contra Costa	N/C							
13	County of Los Angeles	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 114,134	\$ 108,055
% County of San Diego Above/Below	-17.1%	-10.8%
Number of Matches	10	10

N/C - Non Comparator

1 - County of Alameda: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

2 - County of Kern: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the same for both matches.

3 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Cadastral Supervisor									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Engineering Associate II	\$ 98,724	\$ 119,988	-17.4%	\$ 99,110	7/1/2021	1/8/2022	.50%
2	County of San Mateo	GIS Supervisor	\$ 93,141	\$ 116,415	-17.5%	\$ 96,043	10/4/2020	unknown	unknown
3	County of Los Angeles	Supervising Survey-Mapping Technician	\$ 77,559	\$ 98,999	-3.8%	\$ 95,237	1/1/2021	unknown	unknown
4	County of San Diego	Cadastral Supervisor	\$ 75,858	\$ 93,163		\$ 93,163	6/18/2021	unknown	unknown
5	County of Santa Clara	Mapping & I.D. Supervisor	\$ 88,219	\$ 107,220	-16.8%	\$ 89,207	6/28/2021	6/27/2022	3.00%
6	County of Orange	Supervising Cadastral Technician	\$ 66,248	\$ 89,211	-2.0%	\$ 87,427	7/2/2021	7/1/2022	3.50%
7	County of Ventura	Cadastral Technician IV	\$ 61,410	\$ 86,056	-0.7%	\$ 85,453	12/26/2020	12/27/2021	2.00%
8	County of San Bernardino	Cadastral Services Supervisor	\$ 59,883	\$ 82,326	1.9%	\$ 83,891	7/31/2021	7/30/2022	3.00%
9	County of Sacramento	Supervising Cadastral Drafting Technician	\$ 68,716	\$ 83,541	0.1%	\$ 83,625	6/21/2020	unknown	unknown
10	County of Alameda	Mapping Supervisor	\$ 78,582	\$ 93,912	-11.4%	\$ 83,206	12/27/2020	12/26/2021	3.00%
11	County of Contra Costa	Drafting Services Coordinator	\$ 76,575	\$ 93,077	-11.1%	\$ 82,746	7/1/2021	unknown	unknown
12	County of Fresno	Supervising Cadastral Technician	\$ 57,694	\$ 73,788	4.7%	\$ 77,256	11/2/2020	unknown	unknown
13	County of Kern	N/C							
14	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 93,077	\$ 85,453
% County of San Diego Above/Below	0.1%	8.3%
Number of Matches	11	11

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Cadastral Technician									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Los Angeles	Survey-Mapping Technician	\$ 65,912	\$ 84,131	-3.8%	\$ 80,934	1/1/2021	unknown	unknown
2	City and County of San Francisco	Engineering Assistant	\$ 76,884	\$ 93,468	-17.4%	\$ 77,205	7/1/2021	1/8/2022	.50%
3	County of Riverside	Civil Engineering Drafting Technician II	\$ 46,695	\$ 72,960	1.9%	\$ 74,346	5/1/2021	5/1/2022	2.00%
4	County of Orange	Cadastral Technician II	\$ 53,539	\$ 71,698	-2.0%	\$ 70,264	7/2/2021	7/1/2022	3.50%
5	County of Contra Costa	Computer Aided Drafting Operator	\$ 64,201	\$ 78,037	-11.1%	\$ 69,375	7/1/2021	unknown	Unknown
6	County of Ventura	Cadastral Technician II	\$ 48,739	\$ 68,040	-0.7%	\$ 67,564	12/26/2020	12/27/2021	2.00%
7	County of San Mateo	GIS Technician I	\$ 64,437	\$ 80,557	-17.5%	\$ 66,459	10/4/2020	unknown	unknown
8	County of San Diego	Cadastral Technician	\$ 52,520	\$ 64,563		\$ 64,563	6/18/2021	unknown	unknown
9	County of Santa Clara	Cadastral Mapping Technician II	\$ 62,602	\$ 75,600	-16.8%	\$ 62,899	6/14/2021	6/13/2022	3.00%
10	County of Alameda	Mapping Technician II	\$ 57,421	\$ 68,435	-11.4%	\$ 60,633	6/27/2021	6/26/2022	3.25%
11	County of Fresno	Cadastral Technician II	\$ 44,798	\$ 57,330	4.7%	\$ 60,025	11/2/2020	unknown	unknown
12	County of San Bernardino	Cadastral Drafting Technician I	\$ 42,536	\$ 58,490	1.9%	\$ 59,601	7/31/2021	7/30/2022	3.00%
13	County of Kern	Drafting Technician II	\$ 48,024	\$ 58,620	1.2%	\$ 59,323	4/21/2021	unknown	unknown
14	County of Sacramento	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 72,329	\$ 67,012
% County of San Diego Above/Below	-12.0%	-3.8%
Number of Matches	12	12

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Cashier									
1	City and County of San Francisco	Cashier II	\$ 61,776	\$ 75,084	-17.4%	\$ 62,019	7/1/2021	1/8/2022	.50%
2	County of Los Angeles	Cashiering Services Representative I, Sheriff	\$ 38,805	\$ 53,583	-3.8%	\$ 51,547	1/1/2021	unknown	unknown
3	County of Santa Clara	Cashier	\$ 48,949	\$ 58,972	-16.8%	\$ 49,065	6/14/2021	6/13/2022	3.00%
4	County of Orange	Cashier	\$ 37,856	\$ 49,691	-2.0%	\$ 48,697	7/2/2021	7/1/2022	3.50%
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of San Mateo	N/C							
15	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 56,278	\$ 50,306
% County of San Diego Above/Below	-25.0%	-11.7%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Certified Nurse Assistant									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Nursing Assistant	\$ 72,048	\$ 87,540	-17.4%	\$ 72,308	7/1/2021	1/8/2022	.50%
2	County of Los Angeles	Certified Nurse Assistant	\$ 42,151	\$ 56,711	-3.8%	\$ 54,556	1/1/2021	unknown	unknown
3	County of Riverside	Certified Medical Assistants	\$ 29,120	\$ 47,545	1.9%	\$ 48,448	5/1/2021	5/1/2022	2.00%
4	County of San Diego	Certified Nurse Assistant	\$ 35,318	\$ 43,430		\$ 43,430	6/18/2021	unknown	unknown
5	County of Contra Costa	Certified Nursing Assistant	\$ 39,876	\$ 48,469	-11.1%	\$ 43,089	7/1/2021	unknown	unknown
6	County of Orange	Nursing Assistant	\$ 33,176	\$ 43,160	-2.0%	\$ 42,297	7/2/2021	7/1/2022	3.50%
7	County of San Bernardino	Patient Care Assistant	\$ 30,243	\$ 41,205	1.9%	\$ 41,988	7/31/2021	7/30/2022	3.00%
8	County of Kern	Nursing Attendant	\$ 29,304	\$ 35,784	1.2%	\$ 36,213	4/21/2021	unknown	unknown
9	County of Alameda	N/C							
10	County of Fresno	N/C							
11	County of Sacramento	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 47,545	\$ 43,089
% County of San Diego Above/Below	-9.5%	0.8%
Number of Matches	7	7

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Certified Nurse Practitioner									
1	City and County of San Francisco	Nurse Practitioner	\$ 175,296	\$ 248,148	-17.4%	\$ 204,970	7/1/2021	1/8/2022	.50%
2	County of Santa Clara	Nurse Practitioner	\$ 181,143	\$ 243,483	-16.8%	\$ 202,578	10/19/2020	11/1/2021	3.00%
3	County of Los Angeles	Nurse Practitioner	\$ 118,224	\$ 176,967	-3.8%	\$ 170,242	1/1/2021	unknown	unknown
4	County of Contra Costa	Family Nurse Practitioner	\$ 143,368	\$ 179,047	-11.1%	\$ 159,173	1/1/2021	unknown	unknown
5	County of San Mateo ¹	Nurse Practitioner	\$ 161,051	\$ 190,358	-17.5%	\$ 157,045	2/7/2021	unknown	unknown
6	County of Riverside	Nurse Practitioner - Desert	\$ 123,084	\$ 143,472	1.9%	\$ 146,198	5/1/2021	5/1/2022	2.00%
7	County of Orange	Nurse Practitioner II	\$ 114,587	\$ 138,611	-2.0%	\$ 135,839	7/2/2021	7/1/2022	3.50%
8	County of Kern	Nurse Practitioner	\$ 106,128	\$ 129,612	1.2%	\$ 131,167	4/21/2021	unknown	unknown
9	County of Sacramento	Nurse Practitioner	\$ 104,149	\$ 126,595	0.1%	\$ 126,722	8/2/2020	unknown	unknown
10	County of Ventura	Nurse Practitioner	\$ 118,862	\$ 127,606	-0.7%	\$ 126,713	3/21/2021	4/3/2022	2.50%
11	County of Fresno	Nurse Practitioner	\$ 96,590	\$ 117,416	4.7%	\$ 122,935	11/2/2020	unknown	unknown
12	County of San Bernardino	Nurse Practitioner II	\$ 90,085	\$ 119,829	1.9%	\$ 122,106	8/15/2020	unknown	unknown
13	County of Alameda	Mid-Level Practitioner	\$ 105,447	\$ 137,124	-11.4%	\$ 121,492	6/27/2021	6/26/2022	3.25%

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 138,611	\$ 135,839
% County of San Diego Above/Below	-20.3%	-17.9%
Number of Matches	13	13

N/C - Non Comparator

1 - County of San Mateo: Bottom of range is step 2.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Chaplain-Coordinator									
1	County of Santa Clara	Spiritual Services Coordinator	\$ 87,949	\$ 106,431	-16.8%	\$ 88,551	6/14/2021	6/13/2022	3.00%
2	City and County of San Francisco	Chaplain	\$ 80,520	\$ 97,896	-17.4%	\$ 80,862	7/1/2021	1/8/2022	.50%
3	County of Riverside	Chaplain	\$ 52,466	\$ 77,642	1.9%	\$ 79,118	5/1/2021	5/1/2022	2.00%
4	County of Alameda	Chaplain	\$ 70,512	\$ 86,486	-11.4%	\$ 76,627	11/1/2020	10/31/2021	2.00%
6	County of Contra Costa	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Los Angeles	N/C							
10	County of Orange	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 92,191	\$ 79,990
% County of San Diego Above/Below	-46.3%	-27.0%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Child Support Officer									
1	City and County of San Francisco	Child Support Officer II	\$ 80,208	\$ 97,500	-17.4%	\$ 80,535	7/1/2021	1/8/2022	.50%
2	County of Santa Clara	Child Support Officer II	\$ 73,950	\$ 89,463	-16.8%	\$ 74,433	6/14/2021	6/13/2022	3.00%
3	County of Alameda ¹	[Child Support Specialist II/ Child Support Specialist III]	\$ 66,743	\$ 81,159	-11.4%	\$ 71,907	6/27/2021	6/26/2022	3.25%
4	County of Riverside	Child Support Specialist	\$ 45,760	\$ 68,112	1.9%	\$ 69,406	5/1/2021	5/1/2022	2.00%
6	County of San Mateo	Child Support Specialist II	\$ 62,524	\$ 78,144	-17.5%	\$ 64,469	10/4/2020	unknown	unknown
7	County of Los Angeles	Child Support Specialist II	\$ 49,032	\$ 66,072	-3.8%	\$ 63,561	1/1/2021	unknown	unknown
8	County of Orange	Child Support Specialist	\$ 48,090	\$ 64,813	-2.0%	\$ 63,517	7/2/2021	7/1/2022	3.50%
9	County of Sacramento	Child Support Officer II	\$ 51,469	\$ 62,556	0.1%	\$ 62,619	6/21/2021	unknown	unknown
10	County of San Bernardino	Child Support Officer I	\$ 44,158	\$ 60,674	1.9%	\$ 61,826	7/31/2021	7/30/2022	3.00%
11	County of Contra Costa	Child Support Specialist II	\$ 56,269	\$ 68,396	-11.1%	\$ 60,804	7/1/2021	unknown	unknown
12	County of Ventura	Child Support Services Specialist II	\$ 47,133	\$ 60,115	-0.7%	\$ 59,695	12/26/2020	12/27/2021	2.00%
13	County of Fresno	Child Support Specialist II	\$ 41,808	\$ 50,804	4.7%	\$ 53,192	10/19/2020	unknown	unknown
14	County of Kern	Child Support Specialist II	\$ 42,396	\$ 51,756	1.2%	\$ 52,377	4/21/2021	unknown	unknown

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 66,072	\$ 63,517
% County of San Diego Above/Below	0.2%	4.1%
Number of Matches	13	13

N/C - Non Comparator

1 - County of Alameda: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Civil Engineer									
1	County of Sacramento	Associate Civil Engineer	\$ 102,500	\$ 124,591	0.1%	\$ 124,716	6/21/2020	unknown	unknown
2	County of Orange	Civil Engineer	\$ 93,995	\$ 126,589	-2.0%	\$ 124,057	7/2/2021	7/1/2022	3.50%
3	County of Los Angeles	Associate Civil Engineer	\$ 100,974	\$ 128,899	-3.8%	\$ 124,001	1/1/2021	unknown	unknown
4	City and County of San Francisco	Associate Engineer	\$ 122,328	\$ 148,692	-17.4%	\$ 122,820	7/1/2021	1/8/2022	.50%
5	County of San Bernardino	Engineer III	\$ 85,155	\$ 120,203	1.9%	\$ 122,487	3/13/2021	3/26/2022	3.00%
6	County of Ventura	Engineer IV	\$ 81,564	\$ 122,219	-0.7%	\$ 121,364	1/10/2021	1/9/2022	2.00%
7	County of Riverside	Associate Civil Engineer	\$ 79,718	\$ 118,083	1.9%	\$ 120,327	5/1/2021	5/1/2022	2.00%
8	County of San Mateo	Associate Civil Engineer	\$ 114,668	\$ 143,309	-17.5%	\$ 118,230	2/21/2021	unknown	unknown
9	County of Santa Clara	Associate Civil Engineer	\$ 114,887	\$ 139,645	-16.8%	\$ 116,185	10/21/2020	10/20/2021	3.00%
10	County of Alameda ¹	[Assistant Engineer/ Associate Civil Engineer]	\$ 107,471	\$ 127,702	-11.4%	\$ 113,144	2/7/2021	2/6/2022	3.50%
11	County of Contra Costa	Engineer - Project	\$ 109,302	\$ 126,757	-11.1%	\$ 112,687	7/1/2021	unknown	unknown
13	County of Fresno	Engineer III	\$ 82,342	\$ 100,074	4.7%	\$ 104,777	1/11/2021	11/15/2021	3.00%
14	County of Kern	Engineer II	\$ 69,108	\$ 84,372	1.2%	\$ 85,384	4/21/2021	unknown	unknown

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 126,589	\$ 120,327
% County of San Diego Above/Below	-13.4%	-7.7%
Number of Matches	13	13

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Clinical Psychologist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Psychologist	\$ 125,842	\$ 152,961	-16.8%	\$ 127,264	6/14/2021	6/13/2022	3.00%
2	County of Los Angeles	Clinical Psychologist II	\$ 99,735	\$ 127,317	-3.8%	\$ 122,479	1/1/2021	unknown	unknown
3	County of Ventura	Senior Psychologist	\$ 89,172	\$ 116,247	-0.7%	\$ 115,433	12/27/2020	12/26/2021	2.00%
4	City and County of San Francisco	Clinical Psychologist	\$ 110,736	\$ 134,556	-17.4%	\$ 111,143	7/1/2021	1/8/2022	.50%
5	County of Kern	Clinical Psychologist II	\$ 88,248	\$ 107,724	1.2%	\$ 109,017	4/21/2021	unknown	unknown
6	County of San Mateo	Psychologist II	\$ 105,412	\$ 131,807	-17.5%	\$ 108,741	10/4/2020	unknown	unknown
7	County of Fresno	Licensed Psychologist	\$ 82,550	\$ 99,294	4.7%	\$ 103,961	11/2/2020	unknown	unknown
8	County of San Bernardino	Clinical Therapist I - Psychologist	\$ 69,930	\$ 101,171	1.9%	\$ 103,093	3/13/2021	3/26/2022	3.00%
9	County of Orange	Clinical Psychologist I	\$ 76,274	\$ 102,814	-2.0%	\$ 100,758	7/2/2021	7/1/2022	3.50%
10	County of Alameda	Clinical Psychologist	\$ 103,024	\$ 113,091	-11.4%	\$ 100,199	6/27/2021	6/26/2022	3.25%
11	County of Riverside	Senior Clinical Psychologist	\$ 61,154	\$ 90,585	1.9%	\$ 92,306	5/1/2021	5/1/2022	2.00%
12	County of Contra Costa	Clinical Psychologist	\$ 72,739	\$ 102,778	-11.1%	\$ 91,370	7/1/2021	unknown	unknown
13	County of San Diego	Clinical Psychologist	\$ 78,437	\$ 86,486		\$ 86,486	6/18/2021	unknown	unknown
14	County of Sacramento	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 110,408	\$ 106,351
% County of San Diego Above/Below	-27.7%	-23.0%
Number of Matches	12	12

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Code Enforcement Officer									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Riverside	Code Enforcement Officer II	\$ 68,398	\$ 106,935	1.9%	\$ 108,966	5/1/2021	5/1/2022	2.00%
2	County of Alameda	Zoning Investigator II	\$ 86,591	\$ 103,428	-11.4%	\$ 91,638	6/27/2021	6/26/2022	3.25%
3	County of Santa Clara	Code Enforcement Officer II	\$ 89,328	\$ 108,120	-16.8%	\$ 89,956	6/14/2021	6/13/2022	3.00%
4	County of Ventura	Code Compliance Officer II	\$ 62,820	\$ 88,100	-0.7%	\$ 87,484	12/27/2020	12/26/2021	2.00%
5	County of San Mateo	Code Compliance Officer II	\$ 78,664	\$ 98,361	-17.5%	\$ 81,148	10/4/2020	unknown	unknown
6	County of San Bernardino	Code Enforcement Officer II	\$ 57,096	\$ 78,416	1.9%	\$ 79,906	7/31/2021	7/30/2022	3.00%
7	County of Orange	Code Enforcement Officer	\$ 59,384	\$ 79,997	-2.0%	\$ 78,397	7/2/2021	7/1/2022	3.50%
8	County of San Diego	Code Enforcement Officer	\$ 54,413	\$ 73,694		\$ 73,694	6/18/2021	unknown	unknown
9	County of Sacramento	Code Enforcement Officer II	\$ 60,114	\$ 73,080	0.1%	\$ 73,153	6/21/2020	unknown	unknown
10	County of Kern	Code Compliance Officer	\$ 50,724	\$ 61,932	1.2%	\$ 62,675	4/21/2021	unknown	unknown
11	County of Los Angeles	Code Enforcement Officer	\$ 47,380	\$ 63,840	-3.8%	\$ 61,414	1/1/2021	unknown	unknown
12	City and County of San Francisco	N/C							
13	County of Contra Costa	N/C							
14	County of Fresno	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 84,049	\$ 80,527
% County of San Diego Above/Below	-14.1%	-9.3%
Number of Matches	10	10

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Communicable Disease Investigator									
1	County of Los Angeles	Public Health Investigator	\$ 62,904	\$ 80,283	-3.8%	\$ 77,233	1/1/2021	unknown	unknown
2	City and County of San Francisco	Disease Control Investigator	\$ 75,216	\$ 91,440	-17.4%	\$ 75,529	7/1/2021	1/8/2022	.50%
3	County of San Mateo	Communicable Disease Investigator	\$ 71,239	\$ 89,022	-17.5%	\$ 73,443	10/4/2020	unknown	unknown
4	County of Santa Clara	Communicable Disease Investigator	\$ 72,072	\$ 87,056	-16.8%	\$ 72,431	6/14/2021	6/13/2022	3.00%
5	County of Orange	Public Health Investigator	\$ 53,622	\$ 72,280	-2.0%	\$ 70,834	7/2/2021	7/1/2022	3.50%
7	County of Riverside	Communicable Disease Specialist	\$ 44,047	\$ 68,789	1.9%	\$ 70,096	5/1/2021	5/1/2022	2.00%
8	County of Contra Costa ¹	[Disease Intervention Technician/Senior Disease Intervention Technician]	\$ 64,185	\$ 78,018	-11.1%	\$ 69,358	7/1/2021	unknown	Unknown
9	County of Alameda	Public Health Investigator	\$ 59,274	\$ 70,891	-11.4%	\$ 62,809	6/27/2021	6/26/2022	3.25%
10	County of San Bernardino	Communicable Disease Investigator I	\$ 44,387	\$ 60,986	1.9%	\$ 62,144	7/31/2021	7/30/2022	3.00%
11	County of Sacramento	Communicable Disease Investigator II	\$ 50,258	\$ 61,074	0.1%	\$ 61,135	6/21/2020	unknown	unknown
12	County of Fresno	Communicable Disease Specialist II	\$ 44,538	\$ 56,966	4.7%	\$ 59,643	11/2/2020	unknown	unknown
13	County of Kern	Communicable Disease Investigator	\$ 39,144	\$ 47,784	1.2%	\$ 48,357	4/21/2021	unknown	unknown
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 71,585	\$ 69,727
% County of San Diego Above/Below	-1.9%	0.8%
Number of Matches	12	12

N/C - Non Comparator

1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Community Health Program Specialist									
1	County of Fresno	Public Health Program Manager	\$ 73,320	\$ 127,536	4.7%	\$ 133,530	4/19/2021	unknown	unknown
2	County of Santa Clara	Health Program Specialist	\$ 114,390	\$ 139,052	-16.8%	\$ 115,691	6/28/2021	6/27/2022	3.00%
3	County of Sacramento	Human Services Program Specialist	\$ 82,998	\$ 100,892	0.1%	\$ 100,993	6/21/2020	unknown	unknown
4	County of Los Angeles	Health Education Coordinator	\$ 77,748	\$ 104,772	-3.8%	\$ 100,791	1/1/2021	unknown	unknown
5	County of Alameda ¹	[Program Specialist/ Program Services Coordinator]	\$ 90,314	\$ 109,782	-11.4%	\$ 97,267	12/27/2020	12/26/2021	3.00%
7	City and County of San Francisco	Program Specialist	\$ 87,540	\$ 106,416	-17.4%	\$ 87,900	7/1/2021	1/8/2022	.50%
8	County of Ventura	Public Health Program Coordinator	\$ 63,302	\$ 88,337	-0.7%	\$ 87,719	12/27/2020	12/26/2021	2.00%
9	County of Contra Costa	Public Health Program Specialist I	\$ 79,432	\$ 96,550	-11.1%	\$ 85,833	7/1/2021	unknown	Unknown
10	County of Kern	Public Health Program Specialist	\$ 62,868	\$ 76,740	1.2%	\$ 77,661	4/21/2021	unknown	unknown
11	County of Orange	Health Educator	\$ 57,762	\$ 77,605	-2.0%	\$ 76,053	7/2/2021	7/1/2022	3.50%
12	County of Riverside	N/C							
13	County of San Bernardino	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 102,832	\$ 92,583
% County of San Diego Above/Below	-15.1%	-3.7%
Number of Matches	10	10

N/C - Non Comparator

1 - County of Alameda: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Community Health Promotion Assistant									
1	City and County of San Francisco	Assistant Health Educator	\$ 83,232	\$ 101,064	-17.4%	\$ 83,479	7/1/2021	1/8/2022	.50%
2	County of Santa Clara	Health Education Associate	\$ 72,933	\$ 88,207	-16.8%	\$ 73,388	6/14/2021	6/13/2022	3.00%
3	County of San Mateo	Health Education Associate	\$ 65,415	\$ 81,805	-17.5%	\$ 67,489	10/4/2020	unknown	unknown
4	County of San Bernardino	Health Education Assistant	\$ 44,658	\$ 61,464	1.9%	\$ 62,632	7/31/2021	7/30/2022	3.00%
5	County of Los Angeles	Health Education Assistant	\$ 47,151	\$ 63,528	-3.8%	\$ 61,114	1/1/2021	unknown	unknown
6	County of Ventura	Health Education Assistant II	\$ 41,279	\$ 57,972	-0.7%	\$ 57,566	12/26/2020	12/27/2021	2.00%
7	County of Sacramento	Health Education Assistant	\$ 46,876	\$ 56,982	0.1%	\$ 57,039	6/21/2020	unknown	unknown
9	County of Orange	Health Education Assistant	\$ 40,186	\$ 53,414	-2.0%	\$ 52,346	7/2/2021	7/1/2022	3.50%
10	County of Fresno	Health Education Assistant	\$ 36,504	\$ 46,696	4.7%	\$ 48,891	11/2/2020	unknown	unknown
11	County of Kern	Health Education Assistant II	\$ 36,144	\$ 44,112	1.2%	\$ 44,641	4/21/2021	unknown	unknown
12	County of Alameda	N/C							
13	County of Contra Costa	N/C							
14	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 59,718	\$ 59,340
% County of San Diego Above/Below	-6.7%	-6.1%
Number of Matches	10	10

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Community Health Promotion Specialist I									
1	County of Riverside	Health Educator	\$ 52,756	\$ 78,075	1.9%	\$ 79,558	5/1/2021	5/1/2022	2.00%
2	County of Los Angeles	Health Educator	\$ 67,060	\$ 81,082	-3.8%	\$ 78,001	1/1/2021	unknown	unknown
3	County of Sacramento	Health Educator, Range A	\$ 61,847	\$ 75,168	0.1%	\$ 75,243	6/21/2020	unknown	unknown
4	County of Ventura	Health Educator	\$ 53,206	\$ 72,687	-0.7%	\$ 72,178	12/27/2020	12/26/2021	2.00%
6	County of San Bernardino	Health Education Specialist I	\$ 48,090	\$ 66,123	1.9%	\$ 67,380	7/31/2021	7/30/2022	3.00%
7	County of Orange	Health Education Associate	\$ 49,358	\$ 65,936	-2.0%	\$ 64,617	7/2/2021	7/1/2022	3.50%
8	County of Fresno	Health Education Specialist	\$ 44,902	\$ 57,434	4.7%	\$ 60,133	11/2/2020	unknown	unknown
9	County of Contra Costa	Health Education Specialist	\$ 53,721	\$ 65,298	-11.1%	\$ 58,050	7/1/2021	unknown	Unknown
10	City and County of San Francisco	N/C							
11	County of Alameda	N/C							
12	County of Kern	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 69,405	\$ 69,779
% County of San Diego Above/Below	-2.0%	-2.6%
Number of Matches	8	8

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Community Health Promotion Specialist II									
1	City and County of San Francisco	Health Educator	\$ 96,252	\$ 117,084	-17.4%	\$ 96,711	7/1/2021	1/8/2022	.50%
2	County of San Mateo	Public Health Educator	\$ 87,795	\$ 109,780	-17.5%	\$ 90,569	10/4/2020	unknown	unknown
3	County of Santa Clara	Health Education Specialist	\$ 89,037	\$ 107,723	-16.8%	\$ 89,626	6/14/2021	6/13/2022	3.00%
4	County of Los Angeles	Senior Health Educator	\$ 65,110	\$ 87,738	-3.8%	\$ 84,403	1/1/2021	unknown	unknown
5	County of Sacramento	Health Educator, Range B	\$ 68,967	\$ 83,812	0.1%	\$ 83,896	6/21/2020	unknown	unknown
6	County of Riverside	Senior Health Educator	\$ 55,591	\$ 82,276	1.9%	\$ 83,840	5/1/2021	5/1/2022	2.00%
7	County of Contra Costa	Senior Health Education Specialist	\$ 74,925	\$ 91,072	-11.1%	\$ 80,963	7/1/2021	unknown	unknown
8	County of Alameda	Health Educator II	\$ 79,716	\$ 87,692	-11.4%	\$ 77,695	6/27/2021	6/26/2022	3.25%
9	County of Ventura	Senior Health Educator	\$ 55,681	\$ 78,040	-0.7%	\$ 77,493	12/27/2020	12/26/2021	2.00%
11	County of Orange	Health Program Specialist	\$ 55,078	\$ 74,235	-2.0%	\$ 72,751	7/2/2021	7/1/2022	3.50%
12	County of San Bernardino	Health Education Specialist II	\$ 51,771	\$ 71,032	1.9%	\$ 72,382	7/31/2021	7/30/2022	3.00%
13	County of Kern	Health Educator	\$ 45,912	\$ 56,052	1.2%	\$ 56,725	4/21/2021	unknown	unknown
14	County of Fresno	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 85,752	\$ 82,401
% County of San Diego Above/Below	-12.5%	-8.1%
Number of Matches	12	12

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Community Services Officer									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Riverside	Community Services Officer II	\$ 45,945	\$ 71,783	1.9%	\$ 73,147	5/1/2021	5/1/2022	2.00%
2	City and County of San Francisco	Community Police Services Aide	\$ 69,552	\$ 84,552	-17.4%	\$ 69,840	7/1/2021	1/8/2022	.50%
3	County of Sacramento	Sheriff's Community Services Officer II	\$ 56,376	\$ 68,528	0.1%	\$ 68,597	6/20/2021	1/2/2022	1.00%
4	County of Alameda	Sheriff's Technician	\$ 59,854	\$ 71,429	-11.4%	\$ 63,286	6/27/2021	6/26/2022	3.25%
5	County of Santa Clara	Protective Services Officer	\$ 57,666	\$ 69,624	-16.8%	\$ 57,927	6/14/2021	6/13/2022	3.00%
6	County of Orange	Sheriff's Community Services Officer	\$ 43,160	\$ 57,949	-2.0%	\$ 56,790	7/2/2021	7/1/2022	3.50%
7	County of Contra Costa	Sheriff's Ranger	\$ 49,950	\$ 62,232	-11.1%	\$ 55,324	7/1/2021	7/1/2022	5.00%
8	County of San Mateo	Community Services Officer I	\$ 53,143	\$ 66,455	-17.5%	\$ 54,825	10/4/2020	unknown	unknown
9	County of San Bernardino	Community Services Officer	\$ 35,048	\$ 48,110	1.9%	\$ 49,025	7/31/2021	7/30/2022	3.00%
10	County of San Diego	Community Services Officer	\$ 38,501	\$ 47,382		\$ 47,382	6/18/2021	unknown	unknown
11	County of Fresno	Community Service Officer	\$ 35,074	\$ 44,850	4.7%	\$ 46,958	7/1/2019	unknown	unknown
12	County of Ventura	Sheriff's Cadet II	\$ 29,411	\$ 39,701	-0.7%	\$ 39,423	12/27/2020	12/26/2021	2.00%
13	County of Kern	N/C							
14	County of Los Angeles	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 66,455	\$ 56,790
% County of San Diego Above/Below	-40.3%	-19.9%
Number of Matches	11	11

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Construction Technician (T)									
1	County of Riverside	Principal Construction Inspector	\$ 74,085	\$ 115,863	1.9%	\$ 118,064	5/1/2021	5/1/2022	2.00%
3	County of San Mateo ²	[Construction Inspection II/ Capital Projects Manager I]	\$ 91,862	\$ 114,815	-17.5%	\$ 94,722	10/4/2020	unknown	unknown
4	County of Contra Costa	Engineering Technician Supervisor - Construction	\$ 87,267	\$ 106,073	-11.1%	\$ 94,299	7/1/2021	unknown	unknown
5	County of Orange ¹	[Supervising Construction Inspector/ Project Manager]	\$ 70,335	\$ 94,609	-2.0%	\$ 92,717	7/2/2021	7/1/2022	3.50%
6	County of Ventura	Senior Public Works Inspector	\$ 65,098	\$ 91,522	-0.7%	\$ 90,882	12/26/2020	12/27/2021	2.00%
7	City and County of San Francisco	N/C							
8	County of Alameda	N/C							
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of Los Angeles	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 106,073	\$ 94,299
% County of San Diego Above/Below	3.3%	14.0%
Number of Matches	5	5

N/C - Non Comparator

1 - County of Orange: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

2 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Cook									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Cook	\$ 67,284	\$ 81,744	-17.4%	\$ 67,521	7/1/2021	1/8/2022	.50%
2	County of Orange	Head Cook	\$ 49,358	\$ 65,936	-2.0%	\$ 64,617	7/2/2021	7/1/2022	3.50%
3	County of San Mateo ²	Cook II	\$ 63,085	\$ 70,552	-17.5%	\$ 58,206	10/4/2020	unknown	unknown
4	County of Ventura ³	[Cook/ Jail Cook]	\$ 37,523	\$ 55,254	-0.7%	\$ 54,867	12/26/2020	12/27/2021	2.00%
5	County of Alameda	Cook	\$ 50,817	\$ 57,683	-11.4%	\$ 51,107	6/27/2021	6/26/2022	3.25%
6	County of Santa Clara	Cook I	\$ 50,465	\$ 60,805	-16.8%	\$ 50,589	6/14/2021	6/13/2022	3.00%
7	County of Contra Costa	Cook	\$ 46,398	\$ 56,397	-11.1%	\$ 50,137	7/1/2021	unknown	unknown
8	County of Kern ¹	[Cook II/ Juvenile Corrections Cook]	\$ 39,924	\$ 48,744	1.2%	\$ 49,329	4/21/2021	unknown	unknown
9	County of Riverside	Cook	\$ 29,977	\$ 46,759	1.9%	\$ 47,647	5/1/2021	5/1/2022	2.00%
10	County of Sacramento	Food Service Cook	\$ 38,565	\$ 46,876	0.1%	\$ 46,923	6/21/2020	unknown	unknown
11	County of Los Angeles	Cook	\$ 35,721	\$ 47,962	-3.8%	\$ 46,139	1/1/2021	unknown	unknown
12	County of San Bernardino	Cook II	\$ 31,741	\$ 43,659	1.9%	\$ 44,489	7/31/2021	7/30/2022	3.00%
13	County of San Diego	Cook	\$ 34,674	\$ 42,578		\$ 42,578	6/18/2021	unknown	unknown
14	County of Fresno	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 55,826	\$ 50,363
% County of San Diego Above/Below	-31.1%	-18.3%
Number of Matches	12	12

N/C - Non Comparator

1 - County of Kern: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

2 - County of San Mateo: Bottom of range is step 3.

3 - County of Ventura: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Coordinator, Volunteer & Public Services									
1	County of Sacramento	Volunteer Program Coordinator	\$ 99,953	\$ 110,184	0.1%	\$ 110,294	6/21/2020	unknown	unknown
2	County of San Mateo	Program Coordinator II	\$ 86,152	\$ 107,679	-17.5%	\$ 88,836	12/13/2020	unknown	unknown
4	County of Contra Costa	Volunteer Program Coordinator	\$ 77,875	\$ 94,657	-11.1%	\$ 84,150	7/1/2021	unknown	Unknown
5	County of Los Angeles	Volunteer Programs Coordinator II	\$ 51,254	\$ 69,075	-3.8%	\$ 66,450	1/1/2021	unknown	unknown
6	County of Orange	Volunteer Services Coordinator II	\$ 47,861	\$ 64,168	-2.0%	\$ 62,885	7/2/2021	7/1/2022	3.50%
7	County of Kern ¹	[Hospital Volunteer Services Coordinator/ Animal Control Volunteer Coordinator]	\$ 41,148	\$ 50,232	1.2%	\$ 50,835	4/21/2021	unknown	unknown
8	City and County of San Francisco	N/C							
9	County of Alameda	N/C							
10	County of Fresno	N/C							
11	County of Riverside	N/C							
12	County of San Bernardino	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 81,866	\$ 75,300
% County of San Diego Above/Below	2.8%	10.6%
Number of Matches	6	6

N/C - Non Comparator

1 - County of Kern: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Coordinator, Volunteer Services									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Sacramento	Volunteer Program Specialist	\$ 78,154	\$ 94,983	0.1%	\$ 95,078	6/21/2020	unknown	unknown
2	City and County of San Francisco	Volunteer/Outreach Coordinator	\$ 78,828	\$ 95,832	-17.4%	\$ 79,157	7/1/2021	1/8/2022	.50%
3	County of San Diego	Coordinator, Volunteer Services	\$ 50,190	\$ 61,714		\$ 61,714	6/18/2021	unknown	unknown
4	County of Fresno	Volunteer Services Coordinator	\$ 46,774	\$ 56,836	4.7%	\$ 59,507	4/19/2021	unknown	unknown
5	County of San Bernardino	Volunteer Services Coordinator	\$ 41,454	\$ 58,275	1.9%	\$ 59,382	7/31/2021	7/30/2022	3.00%
6	County of Riverside	Volunteer Services Coordinators	\$ 38,425	\$ 56,831	1.9%	\$ 57,911	5/1/2021	5/1/2022	2.00%
7	County of Los Angeles	Volunteer Programs Coordinator I	\$ 42,462	\$ 57,133	-3.8%	\$ 54,962	1/1/2021	unknown	unknown
8	County of Alameda	N/C							
9	County of Contra Costa	N/C							
10	County of Kern	N/C							
11	County of Orange	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 57,704	\$ 59,445
% County of San Diego Above/Below	6.5%	3.7%
Number of Matches	6	6

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Correctional Counselor									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Probation Counselor II	\$ 101,768	\$ 123,754	-16.8%	\$ 102,963	6/14/2021	6/13/2022	3.00%
2	County of Riverside	Correctional Counselor	\$ 63,506	\$ 84,294	1.9%	\$ 85,895	7/1/2021	7/1/2022	3-4%
3	County of San Diego	Correctional Counselor	\$ 67,725	\$ 83,200		\$ 83,200	6/18/2021	unknown	unknown
4	County of San Mateo	Mental Health Counselor II	\$ 71,384	\$ 89,230	-17.5%	\$ 73,615	10/4/2020	unknown	unknown
5	City and County of San Francisco	N/C							
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Los Angeles	N/C							
11	County of Orange	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 89,230	\$ 85,895
% County of San Diego Above/Below	-7.2%	-3.2%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Crime Prevention Specialist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Crime Analyst	\$ 97,856	\$ 118,986	-16.8%	\$ 98,997	6/28/2021	6/27/2022	3.00%
2	County of Alameda	Sheriff's Technician	\$ 59,854	\$ 71,429	-11.4%	\$ 63,286	6/27/2021	6/26/2022	3.25%
3	County of Orange	Crime Prevention Specialist	\$ 44,262	\$ 59,384	-2.0%	\$ 58,196	7/2/2021	7/1/2022	3.50%
4	County of San Mateo	Community Services Officer I	\$ 53,143	\$ 66,455	-17.5%	\$ 54,825	10/4/2020	unknown	unknown
5	County of San Diego	Crime Prevention Specialist	\$ 42,307	\$ 51,979		\$ 51,979	6/18/2021	unknown	unknown
6	County of Kern	Crime Prevention Specialist	\$ 40,536	\$ 49,476	1.2%	\$ 50,070	4/21/2021	unknown	unknown
7	City and County of San Francisco	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Los Angeles	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 66,455	\$ 58,196
% County of San Diego Above/Below	-27.8%	-12.0%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Criminal Legal Secretary I									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Los Angeles	Legal Office Support Assistant I	\$ 44,469	\$ 64,950	-3.8%	\$ 62,481	1/1/2021	unknown	unknown
2	County of San Mateo	Legal Secretary I	\$ 59,300	\$ 74,171	-17.5%	\$ 61,191	10/4/2020	unknown	unknown
3	County of San Diego	Criminal Legal Secretary I	\$ 49,358	\$ 60,694		\$ 60,694	6/18/2021	unknown	unknown
4	County of Ventura	Management Assistant I - Legal	\$ 42,891	\$ 60,047	-0.7%	\$ 59,627	12/27/2020	12/26/2021	2.00%
5	County of Orange	Legal Secretary Trainee	\$ 42,016	\$ 56,597	-2.0%	\$ 55,465	7/2/2021	7/1/2022	3.50%
6	County of Riverside	Legal Support Assistant I	\$ 33,923	\$ 52,918	1.9%	\$ 53,923	5/1/2021	5/1/2022	2.00%
7	County of Santa Clara	Legal Secretary Trainee	\$ 52,680	\$ 63,488	-16.8%	\$ 52,822	6/14/2021	6/13/2022	3.00%
8	County of Sacramento	Legal Secretary I	\$ 43,242	\$ 52,576	0.1%	\$ 52,629	6/21/2020	unknown	unknown
9	County of Fresno	Legal Assistant I	\$ 29,224	\$ 36,244	4.7%	\$ 37,947	11/2/2020	unknown	unknown
10	City and County of San Francisco	N/C							
11	County of Alameda	N/C							
12	County of Contra Costa	N/C							
13	County of Kern	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 58,322	\$ 54,694
% County of San Diego Above/Below	3.9%	9.9%
Number of Matches	8	8

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Criminal Legal Secretary II									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Legal Secretary I	\$ 80,988	\$ 98,436	-17.4%	\$ 81,308	7/1/2021	1/8/2022	.50%
2	County of San Mateo	Legal Secretary II	\$ 66,039	\$ 82,574	-17.5%	\$ 68,124	10/4/2020	unknown	unknown
3	County of San Bernardino	Executive Secretary II	\$ 48,984	\$ 66,269	1.9%	\$ 67,528	7/31/2021	7/30/2022	3.00%
4	County of Ventura	Management Assistant II - Legal	\$ 48,057	\$ 67,279	-0.7%	\$ 66,808	12/27/2020	12/26/2021	2.00%
5	County of Los Angeles	Legal Office Support Assistant II	\$ 49,521	\$ 68,565	-3.8%	\$ 65,959	1/1/2021	unknown	unknown
6	County of Alameda	Legal Secretary	\$ 60,844	\$ 73,951	-11.4%	\$ 65,521	6/27/2021	6/26/2022	3.25%
7	County of San Diego	Criminal Legal Secretary II	\$ 52,811	\$ 64,854		\$ 64,854	6/18/2021	unknown	unknown
8	County of Santa Clara	Legal Secretary I	\$ 63,467	\$ 76,658	-16.8%	\$ 63,780	6/14/2021	6/13/2022	3.00%
9	County of Orange	Legal Secretary	\$ 48,090	\$ 64,813	-2.0%	\$ 63,517	7/2/2021	7/1/2022	3.50%
10	County of Riverside	Legal Support Assistant II	\$ 37,868	\$ 59,128	1.9%	\$ 60,251	5/1/2021	5/1/2022	2.00%
11	County of Sacramento	Legal Secretary II	\$ 45,727	\$ 55,583	0.1%	\$ 55,639	6/21/2020	unknown	unknown
12	County of Kern	Legal Secretary	\$ 36,864	\$ 45,012	1.2%	\$ 45,552	4/21/2021	unknown	unknown
13	County of Fresno	Legal Assistant II	\$ 31,590	\$ 40,404	4.7%	\$ 42,303	11/2/2020	unknown	unknown
14	County of Contra Costa	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 66,774	\$ 64,650
% County of San Diego Above/Below	-3.0%	0.3%
Number of Matches	12	12

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Criminal Legal Secretary III									
1	City and County of San Francisco	Legal Secretary II	\$ 87,096	\$ 105,876	-17.4%	\$ 87,454	7/1/2021	1/8/2022	.50%
2	County of San Mateo	Supervising Legal Secretary	\$ 81,680	\$ 102,064	-17.5%	\$ 84,202	10/4/2020	unknown	unknown
3	County of Santa Clara	Legal Secretary II	\$ 69,410	\$ 83,882	-16.8%	\$ 69,790	6/14/2021	6/13/2022	3.00%
4	County of Los Angeles	Senior Legal Office Support Assistant	\$ 49,521	\$ 72,392	-3.8%	\$ 69,641	1/1/2021	unknown	unknown
6	County of Orange	Senior Legal Secretary	\$ 52,166	\$ 70,325	-2.0%	\$ 68,918	7/2/2021	7/1/2022	3.50%
7	County of Sacramento	Supervising Legal Secretary	\$ 56,376	\$ 68,528	0.1%	\$ 68,597	6/21/2020	unknown	unknown
8	County of Riverside	Senior Legal Support Assistant	\$ 42,068	\$ 65,723	1.9%	\$ 66,972	5/1/2021	5/1/2022	2.00%
9	County of Fresno	Supervising Legal Assistant	\$ 42,822	\$ 54,756	4.7%	\$ 57,330	11/2/2020	unknown	unknown
10	County of Kern	Senior Legal Secretary	\$ 43,464	\$ 53,064	1.2%	\$ 53,701	4/21/2021	unknown	unknown
11	County of Alameda	N/C							
12	County of Contra Costa	N/C							
13	County of San Bernardino	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 70,325	\$ 68,918
% County of San Diego Above/Below	-1.5%	0.6%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Criminalist I									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Diego	Criminalist I	\$ 83,200	\$ 102,274		\$ 102,274	6/18/2021	unknown	unknown
2	County of Orange	Forensic Scientist I	\$ 76,274	\$ 102,814	-2.0%	\$ 100,758	7/2/2021	7/1/2022	3.50%
3	County of Contra Costa	Criminalist I	\$ 97,067	\$ 107,016	-11.1%	\$ 95,137	7/1/2021	7/1/2022	5.00%
4	County of Alameda	Criminalist I	\$ 88,116	\$ 105,963	-11.4%	\$ 93,883	6/27/2021	6/26/2022	3.25%
5	County of San Bernardino	Criminalist I	\$ 66,810	\$ 91,894	1.9%	\$ 93,640	7/31/2021	7/30/2022	3.00%
6	County of San Mateo	Criminalist I	\$ 86,859	\$ 108,532	-17.5%	\$ 89,539	12/13/2020	12/12/2021	2-4%
7	County of Ventura	Forensic Scientist I	\$ 63,276	\$ 88,524	-0.7%	\$ 87,904	12/27/2020	12/26/2021	2.00%
8	City and County of San Francisco	Criminalist I	\$ 86,508	\$ 105,120	-17.4%	\$ 86,829	7/1/2021	1/8/2022	.50%
9	County of Santa Clara	Criminalist I	\$ 82,175	\$ 99,403	-16.8%	\$ 82,703	6/14/2021	6/13/2022	3.00%
10	County of Fresno	Criminalist I	\$ 57,304	\$ 73,294	4.7%	\$ 76,739	7/1/2019	unknown	unknown
11	County of Sacramento	Criminalist I	\$ 59,675	\$ 72,537	0.1%	\$ 72,610	6/21/2021	unknown	unknown
12	County of Kern	Criminalist I	\$ 58,620	\$ 71,568	1.2%	\$ 72,427	4/21/2021	unknown	unknown
13	County of Los Angeles	N/C							
14	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 99,403	\$ 87,904
% County of San Diego Above/Below	2.8%	14.0%
Number of Matches	11	11

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Criminalist II									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Diego	Criminalist II	\$ 98,322	\$ 120,765		\$ 120,765	6/18/2021	unknown	unknown
2	County of Contra Costa	Criminalist II	\$ 105,694	\$ 131,684	-11.1%	\$ 117,067	7/1/2021	7/1/2022	5.00%
3	City and County of San Francisco	Criminalist II	\$ 116,484	\$ 141,576	-17.4%	\$ 116,942	7/1/2021	1/8/2022	.50%
4	County of Orange	Forensic Scientist II	\$ 87,381	\$ 117,728	-2.0%	\$ 115,373	7/2/2021	7/1/2022	3.50%
5	County of San Bernardino	Criminalist II	\$ 81,245	\$ 111,862	1.9%	\$ 113,988	7/31/2021	7/30/2022	3.00%
6	County of San Mateo	Criminalist II	\$ 108,158	\$ 135,197	-17.5%	\$ 111,538	12/13/2020	12/12/2021	2-4%
7	County of Ventura	Forensic Scientist II	\$ 78,051	\$ 109,391	-0.7%	\$ 108,625	12/27/2020	12/26/2021	2.00%
8	County of Alameda	Criminalist II	\$ 96,658	\$ 116,064	-11.4%	\$ 102,833	6/27/2021	6/26/2022	3.25%
9	County of Fresno	Criminalist II	\$ 76,570	\$ 97,942	4.7%	\$ 102,545	7/1/2019	unknown	unknown
10	County of Sacramento	Criminalist II	\$ 79,678	\$ 96,841	0.1%	\$ 96,938	6/21/2021	unknown	unknown
11	County of Santa Clara	Criminalist II	\$ 94,769	\$ 114,675	-16.8%	\$ 95,409	6/14/2021	6/13/2022	3.00%
12	County of Los Angeles	Criminalist	\$ 74,935	\$ 95,650	-3.8%	\$ 92,015	1/1/2021	unknown	unknown
13	County of Kern	Criminalist II	\$ 70,860	\$ 86,508	1.2%	\$ 87,546	4/21/2021	unknown	unknown
14	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 113,268	\$ 105,729
% County of San Diego Above/Below	6.2%	12.5%
Number of Matches	12	12

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Criminalist III									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Contra Costa	Criminalist III	\$ 122,375	\$ 152,466	-11.1%	\$ 135,543	7/1/2021	7/1/2022	5.00%
2	County of San Diego	Criminalist III	\$ 103,979	\$ 127,837		\$ 127,837	6/18/2021	unknown	unknown
3	County of Orange	Forensic Scientist III	\$ 94,765	\$ 127,712	-2.0%	\$ 125,158	7/2/2021	7/1/2022	3.50%
4	County of Los Angeles	Senior Criminalist	\$ 100,974	\$ 128,899	-3.8%	\$ 124,001	1/1/2021	unknown	unknown
5	County of Sacramento	Criminalist III	\$ 99,222	\$ 120,624	0.1%	\$ 120,745	6/21/2021	unknown	unknown
6	County of San Bernardino	Criminalist III	\$ 85,363	\$ 117,541	1.9%	\$ 119,774	7/31/2021	7/30/2022	3.00%
7	County of San Mateo ¹	[Criminalist II/Supervising Criminalist]	\$ 114,117	\$ 142,633	-17.5%	\$ 117,672	12/13/2020	12/12/2021	2-4%
8	County of Ventura	Forensic Scientist III	\$ 84,433	\$ 118,450	-0.7%	\$ 117,621	12/27/2020	12/26/2021	2.00%
9	County of Alameda	Criminalist III	\$ 108,089	\$ 130,338	-11.4%	\$ 115,479	6/27/2021	6/26/2022	3.25%
10	County of Fresno	Criminalist Specialist	\$ 82,368	\$ 105,352	4.7%	\$ 110,304	7/1/2019	unknown	unknown
11	County of Santa Clara	Criminalist III	\$ 109,327	\$ 132,380	-16.8%	\$ 110,140	6/14/2021	6/13/2022	3.00%
12	County of Kern	Criminalist III	\$ 82,296	\$ 100,464	1.2%	\$ 101,670	4/21/2021	unknown	unknown
13	City and County of San Francisco	N/C							
14	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 127,712	\$ 117,672
% County of San Diego Above/Below	0.1%	8.0%
Number of Matches	11	11

N/C - Non Comparator

1 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Departmental Clerk									
1	City and County of San Francisco	Clerk	\$ 55,488	\$ 67,416	-17.4%	\$ 55,686	7/1/2021	1/8/2022	.50%
2	County of Santa Clara	Office Specialist I	\$ 45,500	\$ 54,704	-16.8%	\$ 45,514	6/14/2021	6/13/2022	3.00%
3	County of Alameda	Clerk I	\$ 44,576	\$ 50,697	-11.4%	\$ 44,917	6/27/2021	6/26/2022	3.25%
4	County of Sacramento	Office Assistant I	\$ 35,517	\$ 43,159	0.1%	\$ 43,202	6/21/2020	unknown	unknown
5	County of Ventura	Office Assistant I	\$ 30,673	\$ 41,439	-0.7%	\$ 41,148	12/27/2020	12/26/2021	2.00%
6	County of Orange	Office Trainee	\$ 32,282	\$ 41,621	-2.0%	\$ 40,788	7/2/2021	7/1/2022	3.50%
7	County of San Bernardino	Office Assistant I	\$ 30,077	\$ 36,816	1.9%	\$ 37,516	7/31/2021	7/30/2022	3.00%
8	County of Riverside	Departmental Aide	\$ 29,120	\$ 36,629	1.9%	\$ 37,325	5/1/2021	5/1/2022	2.00%
9	County of Contra Costa ¹	[Clerk - Beginning Level (non-typing)]/Clerk - Beginning Level (Typing)	\$ 33,933	\$ 41,245	-11.1%	\$ 36,667	7/1/2021	unknown	Unknown
10	County of Kern	Office Services Assistant	\$ 29,304	\$ 35,784	1.2%	\$ 36,213	4/21/2021	unknown	unknown
12	County of Fresno	Office Assistant I	\$ 29,354	\$ 32,188	4.7%	\$ 33,701	11/2/2020	unknown	unknown
13	County of Los Angeles	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 41,439	\$ 40,788
% County of San Diego Above/Below	-16.4%	-14.6%
Number of Matches	11	11

N/C - Non Comparator

1 - County of Contra Costa: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Departmental Payroll Technician									
1	City and County of San Francisco	Payroll and Personnel Clerk	\$ 70,980	\$ 86,268	-17.4%	\$ 71,257	7/1/2021	1/8/2022	.50%
2	County of Contra Costa	Health Services Timekeeping Technician	\$ 57,549	\$ 69,951	-11.1%	\$ 62,187	7/1/2021	unknown	unknown
3	County of Los Angeles	Payroll Clerk II	\$ 45,908	\$ 63,528	-3.8%	\$ 61,114	1/1/2021	unknown	unknown
4	County of San Mateo	Payroll-Personnel Coordinator II	\$ 58,281	\$ 72,861	-17.5%	\$ 60,110	10/4/2020	unknown	unknown
5	County of Orange	Accounting Technician	\$ 45,698	\$ 61,298	-2.0%	\$ 60,072	7/2/2021	7/1/2022	3.50%
6	County of Alameda	Payroll Records Clerk	\$ 53,898	\$ 63,603	-11.4%	\$ 56,352	6/27/2021	6/26/2022	3.25%
7	County of San Bernardino	Payroll Specialist	\$ 35,048	\$ 48,110	1.9%	\$ 49,025	7/31/2021	7/30/2022	3.00%
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 63,603	\$ 60,110
% County of San Diego Above/Below	-35.4%	-27.9%
Number of Matches	7	7

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Deputy Medical Examiner I									
1	County of Alameda	Forensic Pathologist	\$ 274,685	\$ 333,736	-11.4%	\$ 295,690	12/27/2020	unknown	unknown
2	County of Sacramento	Forensic Pathologist I	\$ 225,086	\$ 225,086	0.1%	\$ 225,311	6/21/2020	unknown	unknown
4	City and County of San Francisco	N/C							
5	County of Contra Costa	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Los Angeles	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 279,411	\$ 260,501
% County of San Diego Above/Below	-50.5%	-40.3%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Deputy Medical Examiner II									
1	County of Santa Clara	Assistant Medical Examiner-Coroner	\$ 301,579	\$ 366,600	-16.8%	\$ 305,011	10/19/2020	11/1/2021	3.00%
2	City and County of San Francisco	Assistant Medical Examiner	\$ 247,416	\$ 348,192	-17.4%	\$ 287,607	7/1/2021	1/8/2022	.50%
3	County of Riverside	Forensic Pathologist III	\$ 204,766	\$ 280,171	1.9%	\$ 285,494	5/1/2021	5/1/2022	2.00%
4	County of Sacramento	Forensic Pathologist II	\$ 228,636	\$ 252,084	0.1%	\$ 252,336	6/21/2020	unknown	unknown
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Los Angeles	N/C							
11	County of Orange	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 314,181	\$ 286,550
% County of San Diego Above/Below	-31.7%	-20.1%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Deputy Public Admin-Guardian									
1	City and County of San Francisco	Protective Services Worker	\$ 95,676	\$ 122,040	-17.4%	\$ 100,805	7/1/2021	1/8/2022	.50%
2	County of Alameda ¹	[Assistant Public Guardian-Conservator/ Estate Investigator]	\$ 81,802	\$ 99,455	-11.4%	\$ 88,117	6/27/2021	6/26/2022	3.25%
3	County of Santa Clara	Deputy Public Guardian - Conservator	\$ 86,501	\$ 104,664	-16.8%	\$ 87,080	6/14/2021	6/13/2022	3.00%
4	County of Riverside ⁴	[Deputy Public Administrator/ Deputy Public Guardian]	\$ 49,776	\$ 77,736	1.9%	\$ 79,213	5/1/2021	5/1/2022	2.00%
5	County of Los Angeles	Deputy Public Guardian/Deputy Public Conservator-Administrator II	\$ 60,319	\$ 81,282	-3.8%	\$ 78,193	1/1/2021	unknown	unknown
6	County of San Mateo ⁵	[Deputy Public Guardian Conservator II/Deputy Public Administrator II]	\$ 71,384	\$ 89,230	-17.5%	\$ 73,615	10/4/2020	unknown	unknown
7	County of Orange ³	[Deputy Public Guardian I/ Deputy Public Administrator]	\$ 54,808	\$ 73,403	-2.0%	\$ 71,935	7/2/2021	7/1/2022	3.50%
8	County of San Bernardino	Deputy Public Guardian	\$ 49,317	\$ 67,638	1.9%	\$ 68,923	7/31/2021	7/30/2022	3.00%
9	County of Sacramento	Deputy Public Guardian/Conservator II	\$ 56,564	\$ 68,737	0.1%	\$ 68,806	6/21/2020	unknown	unknown
11	County of Kern ²	[Deputy Public Administrator/ Deputy Conservator]	\$ 53,064	\$ 64,776	1.2%	\$ 65,553	4/21/2021	unknown	unknown
12	County of Fresno	Deputy Public Guardian II	\$ 48,438	\$ 61,958	4.7%	\$ 64,870	11/2/2020	unknown	unknown
13	County of Ventura	Deputy Public Administrator-Guardian-Conservator	\$ 46,010	\$ 64,356	-0.7%	\$ 63,906	12/26/2020	12/27/2021	2.00%
14	County of Contra Costa	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 75,570	\$ 72,775
% County of San Diego Above/Below	-11.9%	-7.8%
Number of Matches	12	12

N/C - Non Comparator

1 - County of Alameda: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

2 - County of Kern: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the same for both matches.

3 - County of Orange: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

4 - County of Riverside: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the same for both matches.

5 - County of San Mateo: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Deputy Sheriff Cadet-Detentions/Court Services									
1	County of Ventura	Deputy Sheriff Trainee	\$ 70,886	\$ 81,984	-0.7%	\$ 81,410	5/3/2020	unknown	unknown
2	County of Santa Clara	Deputy Sheriff Cadet - U	\$ 94,931	\$ 94,931	-16.8%	\$ 78,983	10/7/2020	10/21/2021	3.00%
3	County of Orange	Sheriff's Correctional Services Asst Trainee	\$ 43,160	\$ 57,949	-2.0%	\$ 56,790	7/2/2021	7/1/2022	3.50%
4	County of Kern	Sheriff's Detentions Deputy Trainee	\$ 40,932	\$ 52,536	1.2%	\$ 53,166	4/21/2021	unknown	unknown
6	City and County of San Francisco	N/C							
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Los Angeles	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 69,966	\$ 67,886
% County of San Diego Above/Below	-55.2%	-50.6%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Deputy Sheriff's Cadet									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Riverside	Deputy Sheriff Trainee	\$ 63,977	\$ 86,773	1.9%	\$ 88,422	5/1/2021	5/1/2022	2.00%
2	County of Ventura	Deputy Sheriff Trainee	\$ 70,886	\$ 81,984	-0.7%	\$ 81,410	5/3/2020	unknown	unknown
3	County of Santa Clara	Deputy Sheriff Cadet - U	\$ 94,931	\$ 94,931	-16.8%	\$ 78,983	10/7/2020	10/21/2021	3.00%
4	County of Orange	Deputy Sheriff Trainee	\$ 74,838	\$ 74,838	-2.0%	\$ 73,342	7/2/2021	7/1/2022	3.50%
5	County of Alameda	Deputy Sheriff's Recruit	\$ 80,891	\$ 80,891	-11.4%	\$ 71,670	10/4/2020	10/3/2021	2.00%
6	County of San Mateo ¹	Deputy Sheriff Trainee	N/A	\$ 86,672	-17.5%	\$ 71,504	unknown	unknown	unknown
7	County of Sacramento	Deputy Sheriff Recruit	\$ 71,180	\$ 71,180	0.1%	\$ 71,251	6/20/2021	1/2/2022	1.00%
8	County of Fresno	Deputy Sheriff I - Recruit	\$ 51,272	\$ 65,650	4.7%	\$ 68,736	7/1/2019	unknown	unknown
9	County of San Bernardino	Sheriff's Trainee	\$ 54,850	\$ 60,174	1.9%	\$ 61,318	7/31/2021	7/30/2022	3.00%
10	County of San Diego	Deputy Sheriff s Cadet	\$ 56,867	\$ 56,867		\$ 56,867	6/18/2021	unknown	unknown
11	County of Contra Costa	Deputy Sheriff Recruit	\$ 60,648	\$ 60,648	-11.1%	\$ 53,916	7/1/2021	7/1/2022	5.00%
12	City and County of San Francisco	Sheriffs Cadet	\$ 53,304	\$ 64,668	-17.4%	\$ 53,416	7/1/2021	1/8/2022	.50%
13	County of Kern	Deputy Sheriff Trainee	\$ 40,932	\$ 49,980	1.2%	\$ 50,580	4/21/2021	unknown	unknown
14	County of Los Angeles	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 73,009	\$ 71,378
% County of San Diego Above/Below	-28.4%	-25.5%
Number of Matches	12	12

N/C - Non Comparator

1 - County of San Mateo: No range - only 1 step.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Detentions Information Assistant									
1	County of Orange	Sheriff's Correctional Services Assistant	\$ 52,250	\$ 69,971	-2.0%	\$ 68,572	7/2/2021	7/1/2022	3.50%
2	County of Contra Costa	Sheriff's Aide	\$ 55,258	\$ 68,846	-11.1%	\$ 61,204	7/1/2021	7/1/2022	5.00%
3	County of Alameda	Specialist Clerk I	\$ 52,388	\$ 59,374	-11.4%	\$ 52,606	6/27/2021	6/26/2022	3.25%
5	County of Kern	Sheriff's Support Technician	\$ 36,324	\$ 44,340	1.2%	\$ 44,872	4/21/2021	unknown	unknown
6	City and County of San Francisco	N/C							
7	County of Fresno	N/C							
8	County of Los Angeles	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 64,110	\$ 56,905
% County of San Diego Above/Below	-35.2%	-20.0%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Detentions Processing Supervisor									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Contra Costa	Supervising Sheriff's Aide	\$ 63,600	\$ 79,239	-11.1%	\$ 70,443	7/1/2021	7/1/2022	5.00%
2	County of Ventura	Sheriff's Records Supervisor I	\$ 46,900	\$ 65,660	-0.7%	\$ 65,200	12/26/2020	12/27/2021	2.00%
3	County of San Diego	Detentions Processing Supervisor	\$ 49,941	\$ 61,381		\$ 61,381	6/18/2021	unknown	unknown
4	City and County of San Francisco	N/C							
5	County of Alameda	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Los Angeles	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 72,449	\$ 67,822
% County of San Diego Above/Below	-18.0%	-10.5%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Detentions Processing Technician									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Ventura	Sheriff's Service Technician I	\$ 44,416	\$ 65,201	-0.7%	\$ 64,744	8/9/2020	unknown	unknown
2	County of Alameda	Sheriff's Technician	\$ 59,854	\$ 71,429	-11.4%	\$ 63,286	6/27/2021	6/26/2022	3.25%
3	County of Los Angeles	Investigator Aid, Probation	\$ 51,505	\$ 65,751	-3.8%	\$ 63,253	1/1/2021	unknown	unknown
4	County of San Mateo	Sheriff's Criminal Records Technician II	\$ 55,785	\$ 69,762	-17.5%	\$ 57,554	10/4/2020	unknown	unknown
5	County of Santa Clara	Pretrial Services Technician	\$ 54,991	\$ 66,425	-16.8%	\$ 55,265	6/14/2021	6/13/2022	3.00%
6	County of San Diego	Detentions Processing Technician	\$ 42,890	\$ 52,728		\$ 52,728	6/18/2021	unknown	unknown
7	County of Orange	Information Processing Technician	\$ 38,771	\$ 51,064	-2.0%	\$ 50,043	7/2/2021	7/1/2022	3.50%
8	City and County of San Francisco	N/C							
9	County of Contra Costa	N/C							
10	County of Fresno	N/C							
11	County of Kern	N/C							
12	County of Riverside	N/C							
13	County of Sacramento	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 66,088	\$ 60,403
% County of San Diego Above/Below	-25.3%	-14.6%
Number of Matches	6	6

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Dietitian									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Clinical Dietitian II	\$ 97,481	\$ 117,963	-16.8%	\$ 98,145	6/14/2021	6/13/2022	3.00%
2	County of Riverside	Dietitian	\$ 61,037	\$ 90,381	1.9%	\$ 92,098	5/1/2021	5/1/2022	2.00%
3	County of San Mateo	Dietitian II	\$ 84,843	\$ 106,080	-17.5%	\$ 87,516	10/4/2020	unknown	unknown
4	City and County of San Francisco	Dietitian	\$ 87,096	\$ 105,876	-17.4%	\$ 87,454	7/1/2021	1/8/2022	.50%
5	County of San Bernardino	Dietician	\$ 53,498	\$ 75,296	1.9%	\$ 76,727	3/13/2021	3/26/2022	3.00%
6	County of Orange	Public Health Nutritionist I	\$ 57,886	\$ 77,958	-2.0%	\$ 76,399	7/2/2021	7/1/2022	3.50%
7	County of Ventura	Registered Dietitian II	\$ 50,663	\$ 74,570	-0.7%	\$ 74,048	12/27/2020	12/26/2021	2.00%
8	County of Contra Costa	Dietitian	\$ 63,506	\$ 77,192	-11.1%	\$ 68,624	7/1/2021	unknown	Unknown
9	County of Los Angeles	Dietitian	\$ 50,502	\$ 68,054	-3.8%	\$ 65,468	1/1/2021	unknown	unknown
10	County of San Diego	Dietitian	\$ 48,048	\$ 59,010		\$ 59,010	6/18/2021	unknown	unknown
11	County of Alameda	N/C							
12	County of Fresno	N/C							
13	County of Kern	N/C							
14	County of Sacramento	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 77,958	\$ 76,727
% County of San Diego Above/Below	-32.1%	-30.0%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Disease Research Scientist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Public Health Microbiologist	\$ 106,332	\$ 149,754	-16.8%	\$ 124,595	10/21/2020	10/20/2021	3.00%
2	County of Los Angeles	Clinical Laboratory Scientist I	\$ 82,080	\$ 104,772	-3.8%	\$ 100,791	1/1/2021	unknown	unknown
3	County of Orange	Forensic Scientist I	\$ 76,274	\$ 102,814	-2.0%	\$ 100,758	7/2/2021	7/1/2022	3.50%
4	County of Riverside	Clinical Laboratory Scientist I	\$ 60,406	\$ 89,483	1.9%	\$ 91,183	5/1/2021	5/1/2022	2.00%
5	County of San Diego	Disease Research Scientist	\$ 63,336	\$ 77,792		\$ 77,792	6/18/2021	unknown	unknown
6	City and County of San Francisco	N/C							
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 103,793	\$ 100,774
% County of San Diego Above/Below	-33.4%	-29.5%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Drafting Technician									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Los Angeles	Survey-Mapping Technician	\$ 65,912	\$ 84,131	-3.8%	\$ 80,934	1/1/2021	unknown	unknown
2	County of San Mateo	Drafting Technician II	\$ 75,565	\$ 94,451	-17.5%	\$ 77,922	10/4/2020	unknown	unknown
3	City and County of San Francisco	Engineering Assistant	\$ 76,884	\$ 93,468	-17.4%	\$ 77,205	7/1/2021	1/8/2022	.50%
4	County of Riverside	Civil Engineering Drafting Technician II	\$ 46,695	\$ 72,960	1.9%	\$ 74,346	5/1/2021	5/1/2022	2.00%
5	County of Santa Clara	Engineering Technician II	\$ 71,920	\$ 86,952	-16.8%	\$ 72,344	6/14/2021	6/13/2022	3.00%
6	County of Orange	Cadastral Technician II	\$ 53,539	\$ 71,698	-2.0%	\$ 70,264	7/2/2021	7/1/2022	3.50%
7	County of Sacramento	Engineering Technician II	\$ 54,037	\$ 65,688	0.1%	\$ 65,754	6/21/2020	unknown	unknown
8	County of San Diego	Drafting Technician	\$ 50,128	\$ 61,568		\$ 61,568	6/18/2021	unknown	unknown
9	County of Alameda	Mapping Technician II	\$ 57,421	\$ 68,435	-11.4%	\$ 60,633	6/27/2021	6/26/2022	3.25%
10	County of Kern	Drafting Technician II	\$ 48,024	\$ 58,620	1.2%	\$ 59,323	4/21/2021	unknown	unknown
11	County of Contra Costa ¹	[Junior Drafter/Senior Drafter]	\$ 49,615	\$ 60,307	-11.1%	\$ 53,613	7/1/2021	unknown	Unknown
12	County of Fresno	N/C							
13	County of San Bernardino	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 72,329	\$ 71,304
% County of San Diego Above/Below	-17.5%	-15.8%
Number of Matches	10	10

N/C - Non Comparator

1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Election Processing Supervisor									
1	County of San Mateo	Elections Specialist Supervisor	\$ 92,787	\$ 115,958	-17.5%	\$ 95,665	10/4/2020	unknown	unknown
2	County of Santa Clara	Elections Process Supervisor II	\$ 84,005	\$ 102,074	-16.8%	\$ 84,926	6/28/2021	6/27/2022	3.00%
3	County of Orange	Election Section Supervisor	\$ 61,194	\$ 82,181	-2.0%	\$ 80,537	7/2/2021	7/1/2022	3.50%
4	County of Alameda	Supervising Elections Technician	\$ 72,675	\$ 88,338	-11.4%	\$ 78,267	12/27/2020	12/26/2021	3.00%
6	County of Contra Costa	Election Processing Supervisor	\$ 65,421	\$ 79,519	-11.1%	\$ 70,693	7/1/2021	unknown	unknown
7	County of Sacramento	Election Supervisor	\$ 57,253	\$ 69,593	0.1%	\$ 69,663	6/21/2020	unknown	unknown
8	County of Riverside	Elections Coordinator - Services	\$ 44,643	\$ 66,031	1.9%	\$ 67,286	5/1/2021	5/1/2022	2.00%
9	County of Los Angeles	Election/Recorder Services Supervisor	\$ 48,556	\$ 67,225	-3.8%	\$ 64,671	1/1/2021	unknown	unknown
10	City and County of San Francisco	Elections Clerk	\$ 61,464	\$ 74,724	-17.4%	\$ 61,722	7/1/2021	1/8/2022	.50%
11	County of Kern	Elections Process Supervisor	\$ 43,896	\$ 53,592	1.2%	\$ 54,235	4/21/2021	unknown	unknown
12	County of Fresno	N/C							
13	County of San Bernardino	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 77,122	\$ 70,178
% County of San Diego Above/Below	-5.9%	3.6%
Number of Matches	10	10

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Electronic Instrument Technician I									
1	Sacramento Metropolitan Air Quality Management District	Air Quality Instrument Specialist I	\$ 69,612	\$ 84,614	0.1%	\$ 84,699	7/1/2021	unknown	unknown
2	South Coast Air Quality Management District	Air Quality Instrument Specialist I	\$ 59,532	\$ 80,604	-2.8%	\$ 78,347	1/1/2020	unknown	unknown
3	Bay Area Air Quality Management District	Air Quality Instrument Specialist I	\$ 77,561	\$ 94,276	-17.4%	\$ 77,872	11/8/2020	unknown	Unknown
4	County of Los Angeles	Assistant Instrument Technician	\$ 59,136	\$ 79,690	-3.8%	\$ 76,662	1/1/2021	unknown	unknown
6	County of Orange	N/C							
7	County of Ventura	N/C							
8	County of Contra Costa	N/C							
9	San Luis Obispo County Air Pollution Control District	N/C							
10	Imperial County Air Pollution Control District	N/C							
11	County of Alameda	N/C							
12	City and County of San Francisco	N/C							
13	County of Santa Clara	N/C							
14	County of Fresno	N/C							
15	County of Kern	N/C							
16	County of Sacramento	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 82,609	\$ 78,109
% County of San Diego Above/Below	-17.5%	-11.1%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Electronic Instrument Technician II									
1	City and County of San Francisco	Electronic Instrumentation Technician, Water Pollution Control	\$ 112,560	\$ 136,788	-17.4%	\$ 112,987	7/1/2021	1/8/2022	.50%
2	Sacramento Metropolitan Air Quality Management District	Air Quality Instrument Specialist II	\$ 80,057	\$ 97,310	0.1%	\$ 97,407	7/1/2021	unknown	unknown
3	County of Los Angeles	Instrument Technician	\$ 69,586	\$ 93,779	-3.8%	\$ 90,215	1/1/2021	unknown	unknown
4	Bay Area Air Quality Management District	Air Quality Instrument Specialist II	\$ 85,511	\$ 103,939	-17.4%	\$ 85,854	11/8/2020	unknown	Unknown
5	South Coast Air Quality Management District	Air Quality Instrument Specialist II	\$ 64,812	\$ 87,732	-2.8%	\$ 85,276	1/1/2020	unknown	unknown
6	County of Santa Clara	Electronic Repair Technician	\$ 79,934	\$ 96,643	-16.8%	\$ 80,407	6/14/2021	6/13/2022	3.00%
8	Imperial County Air Pollution Control District	Air Pollution Control Monitoring Technician	\$ 43,908	\$ 56,136	5.6%	\$ 59,280	7/3/2020	unknown	unknown
9	County of Ventura	N/C							
10	County of Orange	N/C							
11	San Luis Obispo County Air Pollution Control District	N/C							
12	County of Contra Costa	N/C							
13	County of Riverside	N/C							
14	County of San Bernardino	N/C							
15	County of San Mateo	N/C							
16	County of Alameda	N/C							
17	County of Sacramento	N/C							
18	County of Kern	N/C							
19	County of Fresno	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 96,643	\$ 85,854
% County of San Diego Above/Below	-24.6%	-10.7%
Number of Matches	7	7

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Emergency Medical Services Specialist									
1	County of Santa Clara	Emergency Medical Services (EMS) Specialist	\$ 130,745	\$ 158,933	-16.8%	\$ 132,232	6/28/2021	6/27/2022	3.00%
2	City and County of San Francisco	Emergency Medical Services Agency Specialist	\$ 115,548	\$ 140,448	-17.4%	\$ 116,010	7/1/2021	1/8/2022	.50%
3	County of Alameda	Program Specialist	\$ 72,238	\$ 106,600	-11.4%	\$ 94,448	12/27/2020	12/26/2021	3.00%
5	County of San Mateo	Community Program Analyst II	\$ 86,630	\$ 108,241	-17.5%	\$ 89,299	10/4/2020	unknown	unknown
6	County of Riverside	Emergency Medical Services Specialist	\$ 58,320	\$ 86,334	1.9%	\$ 87,974	5/1/2021	5/1/2022	2.00%
7	County of San Bernardino	Emergency Medical Services Specialist	\$ 57,554	\$ 83,096	1.9%	\$ 84,675	3/13/2021	3/26/2022	3.00%
8	County of Sacramento	Emergency Medical Services Specialist II	\$ 68,716	\$ 83,520	0.1%	\$ 83,604	6/21/2020	unknown	unknown
9	County of Orange	Emergency Medical Services Specialist	\$ 57,886	\$ 77,958	-2.0%	\$ 76,399	7/2/2021	7/1/2022	3.50%
10	County of Fresno	Emergency Medical Services Specialist	\$ 57,018	\$ 69,316	4.7%	\$ 72,574	4/19/2021	unknown	unknown
11	County of Contra Costa	N/C							
12	County of Kern	N/C							
13	County of Los Angeles	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 86,334	\$ 87,974
% County of San Diego Above/Below	3.8%	2.0%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Emergency Services Coordinator									
1	County of Sacramento	Assistant Emergency Operations Coordinator	\$ 99,827	\$ 110,058	0.1%	\$ 110,168	6/21/2020	unknown	unknown
2	County of Santa Clara	Emergency Planning Coordinator	\$ 97,866	\$ 119,009	-16.8%	\$ 99,016	6/28/2021	6/27/2022	3.00%
3	County of Riverside	Emergency Management Program Supervisor	\$ 65,107	\$ 96,399	1.9%	\$ 98,230	5/1/2021	5/1/2022	2.00%
4	County of Los Angeles	Emergency Management Coordinator I, CEO	\$ 73,644	\$ 99,240	-3.8%	\$ 95,469	1/1/2021	unknown	unknown
5	City and County of San Francisco	Emergency Services Coordinator II	\$ 91,704	\$ 111,492	-17.4%	\$ 92,092	7/1/2021	1/8/2022	.50%
6	County of Orange	Emergency Management Prog Coordinator	\$ 68,432	\$ 92,248	-2.0%	\$ 90,403	7/2/2021	7/1/2022	3.50%
8	County of Contra Costa ¹	[Emergency Planning Coordinator/Senior Emergency Planning Coordinator]	\$ 77,710	\$ 94,457	-11.1%	\$ 83,972	7/1/2021	unknown	unknown
9	County of Alameda	Emergency Services Coordinator II	\$ 69,562	\$ 83,213	-11.4%	\$ 73,727	6/27/2021	6/26/2022	3.25%
10	County of Kern	Emergency Medical Services Coordinator	\$ 58,620	\$ 71,568	1.2%	\$ 72,427	4/21/2021	unknown	unknown
11	County of Fresno	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 96,399	\$ 92,092
% County of San Diego Above/Below	-9.3%	-4.4%
Number of Matches	9	9

N/C - Non Comparator

1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Engineering Technician I									
1	City and County of San Francisco	Engineering Assistant	\$ 76,884	\$ 93,468	-17.4%	\$ 77,205	7/1/2021	1/8/2022	.50%
2	County of Riverside	Engineering Technician I	\$ 44,742	\$ 73,747	1.9%	\$ 75,148	5/1/2021	5/1/2022	2.00%
3	County of Alameda ¹	[Public Works Technical Assistant I/ Survey Technician I]	\$ 73,320	\$ 80,933	-11.4%	\$ 71,706	10/4/2020	10/3/2021	3.25%
4	County of Ventura	Engineering Technician II	\$ 48,757	\$ 68,059	-0.7%	\$ 67,582	12/26/2020	12/27/2021	2.00%
5	County of Contra Costa ²	[Engineering Technician - Entry/Engineering Technician - Journey]	\$ 63,182	\$ 75,103	-11.1%	\$ 66,767	7/1/2021	unknown	unknown
6	County of San Mateo	Public Works Technician I	\$ 64,437	\$ 80,557	-17.5%	\$ 66,459	10/4/2020	unknown	unknown
8	County of Santa Clara	Engineering Technician I	\$ 62,774	\$ 75,826	-16.8%	\$ 63,088	6/14/2021	6/13/2022	3.00%
9	County of Fresno	Engineering Technician I	\$ 44,694	\$ 57,200	4.7%	\$ 59,888	12/17/2018	unknown	unknown
10	County of Kern	Engineering Technician I	\$ 48,024	\$ 58,620	1.2%	\$ 59,323	4/21/2021	unknown	unknown
11	County of Sacramento	Engineering Technician I	\$ 46,437	\$ 56,460	0.1%	\$ 56,516	6/21/2020	unknown	unknown
12	County of San Bernardino	Engineering Technician I	\$ 36,421	\$ 50,149	1.9%	\$ 51,102	7/31/2021	7/30/2022	3.00%
13	County of Orange	N/C							
14	County of Los Angeles	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 73,747	\$ 66,459
% County of San Diego Above/Below	-12.1%	-1.0%
Number of Matches	11	11

N/C - Non Comparator

1 - County of Alameda: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

2 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Engineering Technician II									
1	County of Riverside	Engineering Technician II	\$ 49,771	\$ 81,983	1.9%	\$ 83,540	5/1/2021	5/1/2022	2.00%
2	County of Los Angeles	Civil Engineering Technician	\$ 65,912	\$ 84,131	-3.8%	\$ 80,934	1/1/2021	unknown	unknown
3	County of Contra Costa ²	[Engineering Technician - Journey/Engineering Technician - Senior]	\$ 75,061	\$ 90,435	-11.1%	\$ 80,397	7/1/2021	unknown	unknown
4	County of Alameda ¹	[Public Works Technical Assistant II/ Survey Technician II]	\$ 81,682	\$ 90,730	-11.4%	\$ 80,386	10/4/2020	10/3/2021	3.25%
5	County of San Mateo	Public Works Technician II	\$ 75,565	\$ 94,451	-17.5%	\$ 77,922	10/4/2020	unknown	unknown
6	County of Orange	Engineering Technician	\$ 56,597	\$ 76,274	-2.0%	\$ 74,748	7/2/2021	7/1/2022	3.50%
8	County of Santa Clara	Engineering Technician II	\$ 71,920	\$ 86,952	-16.8%	\$ 72,344	6/14/2021	6/13/2022	3.00%
9	County of Ventura	Engineering Technician III	\$ 51,581	\$ 72,540	-0.7%	\$ 72,033	12/26/2020	12/27/2021	2.00%
10	County of San Bernardino	Engineering Technician III	\$ 50,170	\$ 68,890	1.9%	\$ 70,199	7/31/2021	7/30/2022	3.00%
11	County of Fresno	Engineering Technician II	\$ 49,972	\$ 63,934	4.7%	\$ 66,939	12/17/2018	unknown	unknown
12	County of Sacramento	Engineering Technician II	\$ 54,037	\$ 65,688	0.1%	\$ 65,754	6/21/2020	unknown	unknown
13	County of Kern	Engineering Technician II	\$ 53,064	\$ 64,776	1.2%	\$ 65,553	4/21/2021	unknown	unknown
14	City and County of San Francisco	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 79,128	\$ 73,546
% County of San Diego Above/Below	-6.5%	1.0%
Number of Matches	12	12

N/C - Non Comparator

1 - County of Alameda: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

2 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Engineering Technician III									
1	County of Alameda ¹	[Public Works Technical Assistant III/ Survey Technician III]	\$ 105,518	\$ 116,868	-11.4%	\$ 103,545	10/4/2020	10/3/2021	3.25%
2	County of Riverside	Senior Engineering Technician	\$ 57,628	\$ 95,004	1.9%	\$ 96,809	5/1/2021	5/1/2022	2.00%
3	County of San Bernardino	Engineering Technician V	\$ 63,669	\$ 87,506	1.9%	\$ 89,168	7/31/2021	7/30/2022	3.00%
4	County of Contra Costa	Engineering Technician - Senior	\$ 81,511	\$ 99,313	-11.1%	\$ 88,289	7/1/2021	unknown	unknown
5	County of Orange	Senior Engineering Technician	\$ 64,813	\$ 87,381	-2.0%	\$ 85,633	7/2/2021	7/1/2022	3.50%
6	City and County of San Francisco	Engineering Associate I	\$ 85,224	\$ 103,632	-17.4%	\$ 85,600	7/1/2021	1/8/2022	.50%
7	County of Los Angeles	Senior Civil Engineering Technician	\$ 69,586	\$ 88,823	-3.8%	\$ 85,448	1/1/2021	unknown	unknown
8	County of Santa Clara	Engineering Technician III	\$ 84,879	\$ 102,698	-16.8%	\$ 85,445	6/14/2021	6/13/2022	3.00%
10	County of Ventura	Engineering Technician IV	\$ 56,215	\$ 78,817	-0.7%	\$ 78,265	12/26/2020	12/27/2021	2.00%
11	County of Fresno	Senior Engineering Technician	\$ 57,304	\$ 73,294	4.7%	\$ 76,739	12/17/2018	unknown	unknown
12	County of Sacramento	Senior Engineering Technician	\$ 61,053	\$ 74,208	0.1%	\$ 74,282	6/21/2020	unknown	unknown
13	County of Kern	Engineering Technician III	\$ 58,620	\$ 71,568	1.2%	\$ 72,427	4/21/2021	unknown	unknown
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 88,164	\$ 85,524
% County of San Diego Above/Below	-4.2%	-1.1%
Number of Matches	12	12

N/C - Non Comparator

1 - County of Alameda: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Environmental Health Specialist I									
1	County of Riverside	Environmental Health Specialist II	\$ 54,794	\$ 81,043	1.9%	\$ 82,583	5/1/2021	5/1/2022	2.00%
2	County of Orange	Environmental Health Specialist I	\$ 61,402	\$ 82,763	-2.0%	\$ 81,108	7/2/2021	7/1/2022	3.50%
3	County of San Bernardino	Environmental Health Specialist I	\$ 57,554	\$ 77,189	1.9%	\$ 78,655	3/13/2021	3/26/2022	3.00%
5	County of San Mateo ¹	[Environmental Health Specialist I/Hazardous Materials Specialist I]	\$ 78,519	\$ 87,795	-17.5%	\$ 72,431	10/4/2020	unknown	unknown
6	County of Ventura	Environmental Health Specialist I	\$ 50,355	\$ 70,468	-0.7%	\$ 69,975	12/27/2020	12/26/2021	2.00%
7	County of Kern	Environmental Health Specialist I	\$ 51,492	\$ 62,868	1.2%	\$ 63,622	4/21/2021	unknown	unknown
8	County of Fresno	Environmental Health Specialist I	\$ 49,062	\$ 59,618	4.7%	\$ 62,420	10/17/2019	unknown	unknown
9	County of Los Angeles	Environmental Health Specialist I	\$ 50,878	\$ 58,272	-3.8%	\$ 56,058	1/1/2021	unknown	unknown
10	City and County of San Francisco	N/C							
11	County of Alameda	N/C							
12	County of Contra Costa	N/C							
13	County of Sacramento	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 73,829	\$ 71,203
% County of San Diego Above/Below	2.3%	5.7%
Number of Matches	8	8

N/C - Non Comparator

1 - County of San Mateo: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches. Bottom of range is step 3 for both classes.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Environmental Health Specialist II									
1	City and County of San Francisco	Environmental Health Inspector	\$ 110,736	\$ 134,556	-17.4%	\$ 111,143	7/1/2021	1/8/2022	.50%
2	County of Alameda ¹	[Registered Environmental Health Specialist/ Hazardous Materials Specialist]	\$ 94,557	\$ 113,235	-11.4%	\$ 100,326	6/27/2021	6/26/2022	3.25%
3	County of Santa Clara	Environmental Health Specialist	\$ 96,583	\$ 116,892	-16.8%	\$ 97,254	6/14/2021	6/13/2022	3.00%
4	County of San Mateo ³	[Environmental Health Specialist II/Hazardous Materials Specialist II]	\$ 91,997	\$ 114,959	-17.5%	\$ 94,842	10/4/2020	unknown	unknown
5	County of Riverside	Environmental Health Specialist III	\$ 59,640	\$ 88,235	1.9%	\$ 89,911	5/1/2021	5/1/2022	2.00%
6	County of Sacramento	Environmental Specialist II	\$ 73,017	\$ 88,761	0.1%	\$ 88,850	6/30/2021	unknown	unknown
7	County of Contra Costa ²	[Hazardous Materials Specialist I/Environmental Health Specialist I]	\$ 81,827	\$ 99,461	-11.1%	\$ 88,421	7/1/2021	unknown	unknown
8	County of San Bernardino	Environmental Health Specialist II	\$ 59,717	\$ 86,258	1.9%	\$ 87,896	3/13/2021	3/26/2022	3.00%
9	County of Orange	Environmental Health Specialist II	\$ 64,813	\$ 87,381	-2.0%	\$ 85,633	7/2/2021	7/1/2022	3.50%
11	County of Los Angeles	Environmental Health Specialist II	\$ 65,751	\$ 83,926	-3.8%	\$ 80,737	1/1/2021	unknown	unknown
12	County of Ventura	Environmental Health Specialist II	\$ 55,629	\$ 77,666	-0.7%	\$ 77,122	12/27/2020	12/26/2021	2.00%
13	County of Kern	Environmental Health Specialist II	\$ 56,892	\$ 69,456	1.2%	\$ 70,289	4/21/2021	unknown	unknown
14	County of Fresno	Environmental Health Specialist II	\$ 55,120	\$ 67,002	4.7%	\$ 70,151	10/17/2019	unknown	unknown

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 88,235	\$ 88,421
% County of San Diego Above/Below	-6.4%	-6.6%
Number of Matches	13	13

N/C - Non Comparator

1 - County of Alameda: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

2 - County of Contra Costa: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

3 - County of San Mateo: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Environmental Health Specialist III									
1	City and County of San Francisco	Senior Environmental Health Inspector	\$ 118,488	\$ 144,012	-17.4%	\$ 118,954	7/1/2021	1/8/2022	.50%
2	County of Alameda ¹	[Senior Registered Environmental Health Specialist/ Senior Hazardous Materials Specialist]	\$ 102,913	\$ 123,294	-11.4%	\$ 109,238	6/27/2021	6/26/2022	3.25%
3	County of San Mateo ³	[Environmental Health Specialist IV/Hazardous Materials Specialist IV]	\$ 105,371	\$ 131,703	-17.5%	\$ 108,655	10/4/2020	unknown	unknown
4	County of Santa Clara	Senior Environmental Health Specialist	\$ 106,228	\$ 128,656	-16.8%	\$ 107,042	6/14/2021	6/13/2022	3.00%
5	County of Sacramento	Environmental Specialist III	\$ 87,132	\$ 105,924	0.1%	\$ 106,030	6/30/2021	unknown	unknown
6	County of Contra Costa ²	[Environmental Health Specialist II/Supervising Environmental Health Specialist]	\$ 96,220	\$ 116,956	-11.1%	\$ 103,974	7/1/2021	unknown	unknown
7	County of Ventura	Environmental Health Specialist IV	\$ 66,528	\$ 98,026	-0.7%	\$ 97,340	12/27/2020	12/26/2021	2.00%
8	County of Riverside	Environmental Health Specialist IV	\$ 63,179	\$ 93,551	1.9%	\$ 95,328	5/1/2021	5/1/2022	2.00%
9	County of San Bernardino	Environmental Health Specialist III	\$ 63,502	\$ 91,707	1.9%	\$ 93,450	3/13/2021	3/26/2022	3.00%
11	County of Orange	Environmental Health Specialist III	\$ 68,432	\$ 92,248	-2.0%	\$ 90,403	7/2/2021	7/1/2022	3.50%
12	County of Los Angeles	Environmental Health Specialist III	\$ 68,565	\$ 92,404	-3.8%	\$ 88,893	1/1/2021	unknown	unknown
13	County of Kern	Environmental Health Specialist III	\$ 62,868	\$ 76,740	1.2%	\$ 77,661	4/21/2021	unknown	unknown
14	County of Fresno	Environmental Health Specialist III	\$ 60,736	\$ 73,840	4.7%	\$ 77,310	10/17/2019	unknown	unknown

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 98,026	\$ 97,340
% County of San Diego Above/Below	-7.5%	-6.7%
Number of Matches	13	13

N/C - Non Comparator

1 - County of Alameda: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the same for both matches.

2 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

3 - County of San Mateo: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Environmental Health Specialist Tr									
1	County of Riverside	Environmental Health Specialist I	\$ 55,955	\$ 82,842	1.9%	\$ 84,416	5/1/2021	5/1/2022	2.00%
2	County of Santa Clara	Environmental Health Specialist Trainee	\$ 75,743	\$ 91,659	-16.8%	\$ 76,261	6/14/2021	6/13/2022	3.00%
3	County of Contra Costa	Environmental Health Specialist Trainee	\$ 65,356	\$ 79,440	-11.1%	\$ 70,623	7/1/2021	unknown	unknown
4	County of Alameda	Environmental Health Specialist Trainee	\$ 67,821	\$ 77,314	-11.4%	\$ 68,500	6/27/2021	6/26/2022	3.25%
5	County of Sacramento	Environmental Specialist I	\$ 67,839	\$ 67,839	0.1%	\$ 67,907	6/30/2021	unknown	unknown
7	County of San Bernardino	Environmental Health Specialist Trainee	\$ 45,053	\$ 60,445	1.9%	\$ 61,593	3/13/2021	3/26/2022	3.00%
8	County of Kern	Environmental Health Specialist-in-Training	\$ 46,608	\$ 56,892	1.2%	\$ 57,575	4/21/2021	unknown	unknown
9	County of Orange	Environmental Health Aide	\$ 36,483	\$ 48,235	-2.0%	\$ 47,270	7/2/2021	7/1/2022	3.50%
10	County of Fresno	Environmental Health Specialist Trainee	\$ 40,716	\$ 40,716	4.7%	\$ 42,630	10/17/2019	unknown	unknown
11	City and County of San Francisco	N/C							
12	County of Los Angeles	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 67,839	\$ 67,907
% County of San Diego Above/Below	-2.6%	-2.7%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Environmental Health Technician									
1	County of Orange	Environmental Resources Technician	\$ 64,813	\$ 87,381	-2.0%	\$ 85,633	7/2/2021	7/1/2022	3.50%
2	City and County of San Francisco	Environmental Health Technician I	\$ 74,496	\$ 90,528	-17.4%	\$ 74,776	7/1/2021	1/8/2022	.50%
3	County of Sacramento	Environmental Compliance Technician II	\$ 55,812	\$ 67,839	0.1%	\$ 67,907	6/30/2021	unknown	unknown
4	County of San Mateo	Environmental Health Technician II	\$ 65,810	\$ 82,304	-17.5%	\$ 67,901	10/4/2020	unknown	unknown
5	County of Ventura	Resource Management Agency Technician II - Environmental Health	\$ 48,265	\$ 67,402	-0.7%	\$ 66,930	12/26/2020	12/27/2021	2.00%
6	County of Riverside	Environmental Health Technician II	\$ 38,982	\$ 60,876	1.9%	\$ 62,032	5/1/2021	5/1/2022	2.00%
7	County of Contra Costa	Environmental Health Technician	\$ 56,840	\$ 69,089	-11.1%	\$ 61,420	7/1/2021	unknown	unknown
8	County of Kern	Environmental Health Technician II	\$ 48,024	\$ 58,620	1.2%	\$ 59,323	4/21/2021	unknown	unknown
9	County of Los Angeles	Environmental Health Technician	\$ 41,637	\$ 56,012	-3.8%	\$ 53,883	1/1/2021	unknown	unknown
10	County of San Bernardino	Environmental Technician I	\$ 37,710	\$ 51,792	1.9%	\$ 52,776	7/31/2021	7/30/2022	3.00%
12	County of Fresno	Environmental Health Aide	\$ 36,322	\$ 44,148	4.7%	\$ 46,223	10/17/2019	unknown	unknown
13	County of Alameda	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 67,402	\$ 62,032
% County of San Diego Above/Below	-40.0%	-28.8%
Number of Matches	11	11

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Epidemiologist I									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Diego	Epidemiologist I	\$ 76,918	\$ 94,557		\$ 94,557	6/18/2021	unknown	unknown
2	County of Orange	Epidemiologist	\$ 70,325	\$ 94,765	-2.0%	\$ 92,870	7/2/2021	7/1/2022	3.50%
3	County of Alameda	Epidemiologist I	\$ 79,539	\$ 96,741	-11.4%	\$ 85,712	12/27/2020	12/26/2021	3.00%
4	City and County of San Francisco	Epidemiologist I	\$ 82,812	\$ 100,644	-17.4%	\$ 83,132	7/1/2021	1/8/2022	.50%
5	County of San Mateo	Epidemiologist I	\$ 80,037	\$ 100,025	-17.5%	\$ 82,521	10/4/2020	unknown	unknown
6	County of Santa Clara	Epidemiologist I	\$ 81,607	\$ 98,773	-16.8%	\$ 82,179	6/14/2021	6/13/2022	3.00%
7	County of Contra Costa	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Los Angeles	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 98,773	\$ 83,132
% County of San Diego Above/Below	-4.5%	12.1%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Epidemiologist II									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Los Angeles	Epidemiologist	\$ 85,178	\$ 114,787	-3.8%	\$ 110,425	1/1/2021	unknown	unknown
2	City and County of San Francisco	Epidemiologist II	\$ 105,660	\$ 128,436	-17.4%	\$ 106,088	7/1/2021	1/8/2022	.50%
3	County of San Diego	Epidemiologist II	\$ 84,656	\$ 104,062		\$ 104,062	6/18/2021	unknown	unknown
4	County of Sacramento	Epidemiologist	\$ 85,190	\$ 103,544	0.1%	\$ 103,648	6/21/2020	unknown	unknown
5	County of Santa Clara	Epidemiologist II	\$ 98,347	\$ 118,986	-16.8%	\$ 98,997	6/14/2021	6/13/2022	3.00%
6	County of Alameda	Epidemiologist II	\$ 88,816	\$ 109,054	-11.4%	\$ 96,622	12/27/2020	12/26/2021	3.00%
7	County of San Mateo	Epidemiologist II	\$ 89,459	\$ 111,839	-17.5%	\$ 92,268	10/4/2020	unknown	unknown
8	County of Fresno	Epidemiologist	\$ 70,460	\$ 85,644	4.7%	\$ 89,669	10/19/2020	unknown	unknown
9	County of San Bernardino	Public Health Epidemiologist	\$ 60,445	\$ 85,176	1.9%	\$ 86,794	3/13/2021	3/26/2022	3.00%
10	County of Kern	Public Health Epidemiologist	\$ 66,084	\$ 75,324	1.2%	\$ 76,228	4/21/2021	unknown	unknown
11	County of Contra Costa	N/C							
12	County of Orange	N/C							
13	County of Riverside	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 109,054	\$ 96,622
% County of San Diego Above/Below	-4.8%	7.1%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Estate Assistant									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Deputy Public Guardian Assistant	\$ 68,906	\$ 83,294	-16.8%	\$ 69,300	6/14/2021	6/13/2022	3.00%
2	County of Orange	Estate Inventory Clerk	\$ 42,224	\$ 56,597	-2.0%	\$ 55,465	7/2/2021	7/1/2022	3.50%
3	County of Ventura	HS Case Aide II	\$ 38,517	\$ 51,362	-0.7%	\$ 51,002	12/27/2020	12/26/2021	2.00%
4	County of San Diego	Estate Assistant	\$ 41,205	\$ 50,648		\$ 50,648	6/18/2021	unknown	unknown
5	City and County of San Francisco	N/C							
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Los Angeles	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of San Mateo	N/C							

Summary Results		
	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 56,597	\$ 55,465
% County of San Diego Above/Below	-11.7%	-9.5%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Estate Property Manager									
1	County of Alameda	Estate Manager/Investigator	\$ 79,602	\$ 96,845	-11.4%	\$ 85,804	12/27/2020	12/26/2021	3.00%
2	County of Orange ¹	[Senior Deputy Public Administrator/ Senior Deputy Public Guardian]	\$ 64,168	\$ 86,507	-2.0%	\$ 84,777	7/2/2021	7/1/2022	3.50%
3	County of Sacramento	Estate Property Officer	\$ 65,208	\$ 79,260	0.1%	\$ 79,339	6/21/2020	unknown	unknown
5	County of Santa Clara	Estate Property Specialist	\$ 63,864	\$ 77,176	-16.8%	\$ 64,211	6/14/2021	6/13/2022	3.00%
6	County of Riverside ²	[Estate Property Technician/ Estate Investigator]	\$ 38,817	\$ 62,316	1.9%	\$ 63,500	5/1/2021	5/1/2022	2.00%
7	City and County of San Francisco	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of Los Angeles	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 79,260	\$ 79,339
% County of San Diego Above/Below	-4.3%	-4.4%
Number of Matches	5	5

N/C - Non Comparator

1 - County of Orange: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

2 - County of Riverside: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Executive Housekeeper									
1	County of San Bernardino	Hospital Environmental Services Supervisor	\$ 40,539	\$ 55,702	1.9%	\$ 56,761	7/31/2021	7/30/2022	3.00%
3	County of Riverside	Lead Housekeeper	\$ 33,613	\$ 43,413	1.9%	\$ 44,238	5/1/2021	5/1/2022	2.00%
4	County of Kern	Housekeeper	\$ 29,304	\$ 35,784	1.2%	\$ 36,213	4/21/2021	unknown	unknown
5	City and County of San Francisco	N/C							
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Fresno	N/C							
9	County of Los Angeles	N/C							
10	County of Orange	N/C							
11	County of Sacramento	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 43,413	\$ 44,238
% County of San Diego Above/Below	23.1%	21.7%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Facility Services Contract Specialist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Maintenance Contract Manager - U	\$ 84,074	\$ 102,190	-16.8%	\$ 85,022	6/28/2021	6/27/2022	3.00%
2	County of San Diego	Facility Services Contract Specialist	\$ 54,101	\$ 66,456		\$ 66,456	6/18/2021	unknown	unknown
3	County of Ventura	Contract Support Specialist II	\$ 42,249	\$ 59,139	-0.7%	\$ 58,725	12/27/2020	12/26/2021	2.00%
4	County of Orange	Facilities Contract Services Inspector	\$ 42,640	\$ 57,158	-2.0%	\$ 56,015	7/2/2021	7/1/2022	3.50%
5	City and County of San Francisco	N/C							
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Los Angeles	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of San Mateo	N/C							

Summary Results		
	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 59,139	\$ 58,725
% County of San Diego Above/Below	11.0%	11.6%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Fleet Parts Specialist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Parts Storekeeper	\$ 68,220	\$ 82,944	-17.4%	\$ 68,512	7/1/2021	1/8/2022	.50%
2	County of Contra Costa	Materials Technician	\$ 56,953	\$ 69,226	-11.1%	\$ 61,542	7/1/2021	unknown	unknown
3	County of San Bernardino	Equipment Parts Specialist I	\$ 43,285	\$ 59,488	1.9%	\$ 60,618	7/31/2021	7/30/2022	3.00%
4	County of Los Angeles	Procurement Assistant I	\$ 46,464	\$ 62,592	-3.8%	\$ 60,214	1/1/2021	unknown	unknown
5	County of Santa Clara	Fleet Parts Coordinator	\$ 58,165	\$ 70,217	-16.8%	\$ 58,420	6/14/2021	6/13/2022	3.00%
6	County of Riverside	Equipment Parks Storekeeper	\$ 36,610	\$ 57,168	1.9%	\$ 58,254	5/1/2021	5/1/2022	2.00%
7	County of Sacramento	Storekeeper - Fleet Service	\$ 46,980	\$ 57,086	0.1%	\$ 57,143	6/21/2020	unknown	unknown
8	County of Alameda	Auto Parts Technician	\$ 62,538	\$ 62,538	-11.4%	\$ 55,409	6/27/2021	6/26/2022	3.25%
9	County of San Mateo	Storekeeper II	\$ 52,727	\$ 65,914	-17.5%	\$ 54,379	10/4/2020	unknown	unknown
10	County of San Diego	Fleet Parts Specialist	\$ 43,763	\$ 53,810		\$ 53,810	6/18/2021	unknown	unknown
11	County of Ventura	Parts Specialist	\$ 38,588	\$ 53,997	-0.7%	\$ 53,619	12/26/2020	12/27/2021	2.00%
12	County of Fresno	Fleet Services Parts Specialist	\$ 34,372	\$ 41,782	4.7%	\$ 43,746	11/2/2020	unknown	unknown
13	County of Kern	Automotive Parts Storekeeper II	\$ 34,212	\$ 41,760	1.2%	\$ 42,261	4/21/2021	unknown	unknown
14	County of Orange	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 61,013	\$ 57,698
% County of San Diego Above/Below	-13.4%	-7.2%
Number of Matches	12	12

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Fleet Standards Technician									
1	County of Los Angeles	Assistant Automotive Equipment Coordinator	\$ 60,615	\$ 81,681	-3.8%	\$ 78,577	1/1/2021	unknown	unknown
2	County of Alameda	Sheriff's Fleet Services Coordinator	\$ 63,315	\$ 76,939	-11.4%	\$ 68,168	12/27/2020	unknown	unknown
4	County of Contra Costa	Fleet Equipment Specialist	\$ 64,201	\$ 70,782	-11.1%	\$ 62,925	7/1/2021	unknown	unknown
5	City and County of San Francisco	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 76,939	\$ 68,168
% County of San Diego Above/Below	-19.7%	-6.1%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Fleet Support Specialist									
1	County of Santa Clara	Fleet Logistics Supervisor	\$ 97,964	\$ 119,103	-16.8%	\$ 99,094	6/28/2021	6/27/2022	3.00%
3	City and County of San Francisco	N/C							
4	County of Alameda	N/C							
5	County of Contra Costa	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Los Angeles	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 119,103	\$ 99,094
% County of San Diego Above/Below	-46.2%	-21.6%
Number of Matches	1	1

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Food Services Supervisor									
1	County of Contra Costa	Head Detention Cook	\$ 68,870	\$ 78,382	-11.1%	\$ 69,681	7/1/2021	unknown	unknown
2	County of Alameda ¹	[Senior Food Service Worker/ Food and Support Services Manager]	\$ 63,028	\$ 75,596	-11.4%	\$ 66,978	12/27/2020	12/26/2021	3.00%
3	City and County of San Francisco	Food Service Supervisor	\$ 65,004	\$ 78,960	-17.4%	\$ 65,221	7/1/2021	1/8/2022	.50%
4	County of Kern	Juvenile Corrections Food Services Supervisor	\$ 52,536	\$ 64,128	1.2%	\$ 64,898	4/21/2021	unknown	unknown
5	County of San Mateo ²	Supervising Cook	\$ 67,162	\$ 75,045	-17.5%	\$ 61,912	10/4/2020	unknown	unknown
6	County of Ventura	Assistant Food Services Supervisor	\$ 41,587	\$ 58,120	-0.7%	\$ 57,713	12/26/2020	12/27/2021	2.00%
7	County of San Bernardino	Sheriff's Food Services Supervisor/Food Services Supervisor	\$ 41,080	\$ 56,514	1.9%	\$ 57,587	7/31/2021	7/30/2022	3.00%
8	County of Sacramento	Food Service Supervisor	\$ 46,813	\$ 56,919	0.1%	\$ 56,976	6/21/2020	unknown	unknown
9	County of Riverside	Food and Nutrition Services Supervisor	\$ 37,631	\$ 55,626	1.9%	\$ 56,683	5/1/2021	5/1/2022	2.00%
11	County of Orange	Senior Institutional Cook	\$ 42,016	\$ 56,410	-2.0%	\$ 55,281	7/2/2021	7/1/2022	3.50%
12	County of Fresno	N/C							
13	County of Los Angeles	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 61,124	\$ 59,813
% County of San Diego Above/Below	-9.7%	-7.3%
Number of Matches	10	10

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

2 - County of San Mateo: Bottom of range is step 3.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Food Services Worker									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Mateo ¹	Cook I	\$ 58,322	\$ 65,186	-17.5%	\$ 53,778	10/4/2020	unknown	unknown
2	City and County of San Francisco	Food Service Worker	\$ 50,232	\$ 64,092	-17.4%	\$ 52,940	7/1/2021	1/8/2022	.50%
3	County of Alameda	Food Service Worker	\$ 48,381	\$ 54,864	-11.4%	\$ 48,610	6/27/2021	6/26/2022	3.25%
4	County of Santa Clara	Food Service Worker - Correction - U	\$ 48,306	\$ 58,132	-16.8%	\$ 48,366	6/14/2021	6/13/2022	3.00%
5	County of Sacramento	Food Service Worker	\$ 33,408	\$ 40,612	0.1%	\$ 40,653	6/21/2020	unknown	unknown
6	County of Contra Costa	Institutional Services Aide	\$ 36,912	\$ 44,867	-11.1%	\$ 39,887	7/1/2021	unknown	unknown
7	County of Riverside	Food Service Worker	\$ 31,200	\$ 37,640	1.9%	\$ 38,355	5/1/2021	5/1/2022	2.00%
8	County of Los Angeles	Food Services Worker	\$ 31,320	\$ 38,056	-3.8%	\$ 36,610	1/1/2021	unknown	unknown
9	County of Ventura	Food Services Assistant II	\$ 29,628	\$ 36,764	-0.7%	\$ 36,507	12/26/2020	12/27/2021	2.00%
10	County of Kern	Food Service Worker (II)	\$ 29,304	\$ 35,784	1.2%	\$ 36,213	4/21/2021	unknown	unknown
11	County of Orange	Food Service Worker	\$ 28,434	\$ 36,483	-2.0%	\$ 35,754	7/2/2021	7/1/2022	3.50%
12	County of San Bernardino	Food Service Worker I	\$ 30,077	\$ 34,882	1.9%	\$ 35,544	7/31/2021	7/30/2022	3.00%
13	County of San Diego	Food Services Worker	\$ 30,534	\$ 34,050		\$ 34,050	6/18/2021	unknown	unknown
14	County of Fresno	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 39,334	\$ 39,121
% County of San Diego Above/Below	-15.5%	-14.9%
Number of Matches	12	12

N/C - Non Comparator

1 - County of San Mateo: Bottom of range is step 3.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Forensic Autopsy Room Supervisor									
2	County of Orange	Supervisor, Forensics Operations	\$ 67,912	\$ 91,541	-2.0%	\$ 89,710	7/2/2021	7/1/2022	3.50%
3	County of Los Angeles	Head, Forensic Autopsy Support Services	\$ 63,372	\$ 83,106	-3.8%	\$ 79,948	1/1/2021	unknown	unknown
4	County of Riverside	Forensic Supervisor	\$ 50,293	\$ 74,438	1.9%	\$ 75,852	5/1/2021	5/1/2022	2.00%
5	County of Sacramento	Supervising Coroner Technician	\$ 55,833	\$ 67,860	0.1%	\$ 67,928	6/21/2020	unknown	unknown
6	City and County of San Francisco	N/C							
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 78,772	\$ 77,900
% County of San Diego Above/Below	14.0%	14.9%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Forensic Autopsy Specialist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Forensic Autopsy Technician	\$ 77,868	\$ 94,644	-17.4%	\$ 78,176	7/1/2021	1/8/2022	.50%
2	County of Santa Clara	Forensic Pathology Technician	\$ 75,028	\$ 90,619	-16.8%	\$ 75,395	6/14/2021	6/13/2022	3.00%
3	County of Riverside	Forensic Services Specialist II	\$ 45,680	\$ 71,328	1.9%	\$ 72,683	5/1/2021	5/1/2022	2.00%
4	County of Orange	Forensic Assistant II	\$ 53,539	\$ 71,698	-2.0%	\$ 70,264	7/2/2021	7/1/2022	3.50%
5	County of San Diego	Forensic Autopsy Specialist	\$ 53,893	\$ 66,269		\$ 66,269	6/18/2021	unknown	unknown
6	County of San Bernardino	Autopsy Assistant	\$ 44,387	\$ 60,986	1.9%	\$ 62,144	7/31/2021	7/30/2022	3.00%
7	County of Ventura	Forensic Pathology Technician	\$ 45,804	\$ 58,465	-0.7%	\$ 58,056	12/26/2020	12/27/2021	2.00%
8	County of Sacramento	Coroner Technician II	\$ 46,187	\$ 56,146	0.1%	\$ 56,202	6/21/2020	unknown	unknown
9	County of San Mateo	Forensic Autopsy Technician	\$ 52,893	\$ 66,122	-17.5%	\$ 54,551	10/4/2020	unknown	unknown
10	County of Fresno	Forensic Autopsy Technician	\$ 38,402	\$ 49,140	4.7%	\$ 51,450	7/1/2019	unknown	unknown
11	County of Contra Costa	Pathology Technician	\$ 45,309	\$ 55,073	-11.1%	\$ 48,960	7/1/2021	unknown	unknown
12	County of Alameda	N/C							
13	County of Kern	N/C							
14	County of Los Angeles	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 63,554	\$ 60,100
% County of San Diego Above/Below	4.1%	9.3%
Number of Matches	10	10

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Forensic Documents Examiner									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Los Angeles	Forensic Documents Examiner	\$ 103,751	\$ 132,440	-3.8%	\$ 127,407	1/1/2021	unknown	unknown
2	County of San Diego	Forensic Documents Examiner	\$ 97,157	\$ 119,330		\$ 119,330	6/18/2021	unknown	unknown
3	City and County of San Francisco	Forensic Document Examiner	\$ 113,076	\$ 137,460	-17.4%	\$ 113,542	7/1/2021	1/8/2022	.50%
4	County of Orange	Computer Forensic Examiner	\$ 84,469	\$ 113,547	-2.0%	\$ 111,276	7/2/2021	7/1/2022	3.50%
5	County of Riverside	Forensic Technician II	\$ 58,320	\$ 91,158	1.9%	\$ 92,890	5/1/2021	5/1/2022	2.00%
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 122,993	\$ 112,409
% County of San Diego Above/Below	-3.1%	5.8%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Forensic Evidence Technician									
1	County of Riverside	Forensic Technician II	\$ 58,320	\$ 91,158	1.9%	\$ 92,890	5/1/2021	5/1/2022	2.00%
2	County of San Bernardino	Sheriff's Crime Scene Specialist III	\$ 59,883	\$ 82,326	1.9%	\$ 83,891	7/31/2021	7/30/2022	3.00%
4	County of Contra Costa ¹	[Forensic Technologist/Crime Scene Investigator II]	\$ 68,503	\$ 85,347	-11.1%	\$ 75,873	7/1/2021	7/1/2022	5.00%
5	County of Los Angeles	Forensic Technician II	\$ 61,218	\$ 74,013	-3.8%	\$ 71,200	1/1/2021	unknown	unknown
6	County of Orange	Forensics Technician	\$ 44,262	\$ 59,384	-2.0%	\$ 58,196	7/2/2021	7/1/2022	3.50%
7	County of Kern	Evidence Technician II	\$ 46,608	\$ 56,892	1.2%	\$ 57,575	4/21/2021	unknown	unknown
8	City and County of San Francisco	N/C							
9	County of Alameda	N/C							
10	County of Fresno	N/C							
11	County of Sacramento	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 78,170	\$ 73,537
% County of San Diego Above/Below	0.7%	6.5%
Number of Matches	6	6

N/C - Non Comparator

1 - County of Contra Costa: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Geographic Information Systems Analyst									
1	County of Santa Clara	Geographic Information Systems (GIS) Analyst	\$ 118,192	\$ 143,668	-16.8%	\$ 119,532	6/14/2021	6/13/2022	3.00%
2	County of Sacramento	Geographic Information Systems Analyst II	\$ 81,223	\$ 103,627	0.1%	\$ 103,731	6/21/2020	unknown	unknown
3	County of Orange	Geographic Information Sys Analyst	\$ 77,958	\$ 104,749	-2.0%	\$ 102,654	7/2/2021	7/1/2022	3.50%
4	County of Los Angeles	Geographic Information Systems Analyst	\$ 81,880	\$ 104,517	-3.8%	\$ 100,545	1/1/2021	unknown	unknown
5	County of Alameda	Geographic Information Systems Analyst	\$ 87,194	\$ 111,634	-11.4%	\$ 98,907	12/27/2020	unknown	unknown
6	County of Ventura ¹	[Geographic Information Systems Specialist II/ GIS Analyst]	\$ 73,778	\$ 97,987	-0.7%	\$ 97,301	1/10/2021	1/9/2022	2.00%
7	County of Riverside	GIS Analyst	\$ 54,717	\$ 81,004	1.9%	\$ 82,543	5/1/2021	5/1/2022	2.00%
8	County of San Mateo	GIS Technician II	\$ 75,565	\$ 94,451	-17.5%	\$ 77,922	10/4/2020	unknown	unknown
10	County of Kern	Geographic Information Systems Programmer/Analyst	\$ 55,776	\$ 68,088	1.2%	\$ 68,905	4/21/2021	unknown	unknown
11	City and County of San Francisco	N/C							
12	County of Contra Costa	N/C							
13	County of Fresno	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 103,627	\$ 98,907
% County of San Diego Above/Below	-34.2%	-28.1%
Number of Matches	9	9

N/C - Non Comparator

1 - County of Ventura: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Geographic Information Systems Technician									
1	County of Los Angeles	Geographic Information Systems Technician II	\$ 72,034	\$ 91,946	-3.8%	\$ 88,452	1/1/2021	unknown	unknown
2	County of Alameda	Geographical Information Systems Technician	\$ 82,446	\$ 98,575	-11.4%	\$ 87,337	6/27/2021	6/26/2022	3.25%
3	County of Orange	Geographic Information Sys Technician	\$ 62,712	\$ 84,469	-2.0%	\$ 82,779	7/2/2021	7/1/2022	3.50%
4	County of Riverside	GIS Specialist II	\$ 44,742	\$ 69,929	1.9%	\$ 71,257	5/1/2021	5/1/2022	2.00%
5	County of Ventura	Geographic Information Systems Technician II	\$ 49,830	\$ 69,769	-0.7%	\$ 69,280	12/26/2020	12/27/2021	2.00%
6	County of Sacramento	Geographic Information Systems Technician II	\$ 54,079	\$ 65,730	0.1%	\$ 65,796	6/21/2020	unknown	unknown
7	County of Contra Costa	Geographic Information Systems Technician	\$ 59,698	\$ 72,563	-11.1%	\$ 64,509	7/1/2021	unknown	unknown
8	County of San Bernardino	Geographic Information Systems Technician I	\$ 44,158	\$ 60,674	1.9%	\$ 61,826	7/31/2021	7/30/2022	3.00%
10	County of Kern	Geographic Information Systems Technician II	\$ 41,352	\$ 50,472	1.2%	\$ 51,078	4/21/2021	unknown	unknown
11	City and County of San Francisco	N/C							
12	County of Fresno	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 69,929	\$ 69,280
% County of San Diego Above/Below	-22.5%	-21.3%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Graphic Artist									
1	County of Los Angeles	Graphic Artist	\$ 52,146	\$ 70,280	-3.8%	\$ 67,609	1/1/2021	unknown	unknown
2	County of San Mateo ²	[Graphics Associate/Graphics Specialist]	\$ 64,728	\$ 80,910	-17.5%	\$ 66,751	10/4/2020	unknown	unknown
3	County of Riverside	Graphic Arts Illustrator	\$ 41,345	\$ 64,582	1.9%	\$ 65,809	5/1/2021	5/1/2022	2.00%
4	County of Alameda ¹	[Photographic and Printing Services Technician/ Graphic Designer]	\$ 61,200	\$ 73,453	-11.4%	\$ 65,080	12/27/2020	12/26/2021	3.00%
5	County of Orange	Computer Graphics Specialist	\$ 49,358	\$ 65,936	-2.0%	\$ 64,617	7/2/2021	7/1/2022	3.50%
7	County of Santa Clara	Graphic Designer I	\$ 60,416	\$ 72,956	-16.8%	\$ 60,699	6/14/2021	6/13/2022	3.00%
8	County of San Bernardino	Graphic Designer I	\$ 42,536	\$ 58,490	1.9%	\$ 59,601	7/31/2021	7/30/2022	3.00%
9	County of Fresno	Graphic Arts Specialist	\$ 43,316	\$ 52,624	4.7%	\$ 55,097	11/2/2020	unknown	unknown
10	County of Kern	Graphic Artist	\$ 35,244	\$ 43,032	1.2%	\$ 43,548	4/21/2021	unknown	unknown
11	City and County of San Francisco	N/C							
12	County of Contra Costa	N/C							
13	County of Sacramento	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 65,936	\$ 64,617
% County of San Diego Above/Below	-2.9%	-0.9%
Number of Matches	9	9

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

2 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Graphic Design Specialist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Diego	Graphic Design Specialist	\$ 66,685	\$ 81,973		\$ 81,973	6/18/2021	unknown	unknown
2	County of Alameda	Graphic Designer	\$ 72,051	\$ 86,944	-11.4%	\$ 77,032	12/27/2020	12/26/2021	3.00%
3	County of San Mateo	Graphics Specialist	\$ 69,263	\$ 86,568	-17.5%	\$ 71,419	10/4/2020	unknown	unknown
4	County of Los Angeles	Graphic Arts Specialist	\$ 55,057	\$ 74,197	-3.8%	\$ 71,378	1/1/2021	unknown	unknown
5	County of Orange	Senior Computer Graphics Specialist	\$ 53,539	\$ 71,698	-2.0%	\$ 70,264	7/2/2021	7/1/2022	3.50%
6	County of Santa Clara	Graphic Designer II	\$ 68,906	\$ 83,294	-16.8%	\$ 69,300	6/14/2021	6/13/2022	3.00%
7	City and County of San Francisco	Graphic Artist	\$ 65,604	\$ 83,748	-17.4%	\$ 69,176	7/1/2021	1/8/2022	.50%
8	County of Riverside	Graphic Arts Illustrator	\$ 41,345	\$ 64,582	1.9%	\$ 65,809	5/1/2021	5/1/2022	2.00%
9	County of Sacramento	Graphic Designer	\$ 51,636	\$ 62,765	0.1%	\$ 62,828	6/21/2020	unknown	unknown
10	County of Contra Costa	Graphic Designer	\$ 52,824	\$ 64,208	-11.1%	\$ 57,081	7/1/2021	unknown	unknown
11	County of Fresno	N/C							
12	County of Kern	N/C							
13	County of San Bernardino	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 74,197	\$ 69,300
% County of San Diego Above/Below	9.5%	15.5%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Groundwater Geologist									
1	County of Santa Clara	Environmental Health Geologist/Engineer	\$ 134,549	\$ 163,966	-16.8%	\$ 136,420	10/21/2020	10/20/2021	3.00%
2	County of Los Angeles	Engineering Geologist	\$ 112,272	\$ 128,582	-3.8%	\$ 123,696	1/1/2021	unknown	unknown
4	County of Ventura	Staff Geologist	\$ 75,523	\$ 107,778	-0.7%	\$ 107,024	1/10/2021	1/9/2022	2.00%
5	County of Orange	Senior Environmental Resources Specialist	\$ 80,538	\$ 108,493	-2.0%	\$ 106,323	7/2/2021	7/1/2022	3.50%
6	County of Riverside	Associate Geologist	\$ 68,016	\$ 100,705	1.9%	\$ 102,618	5/1/2021	5/1/2022	2.00%
7	County of Kern	Engineer II	\$ 69,108	\$ 84,372	1.2%	\$ 85,384	4/21/2021	unknown	unknown
8	City and County of San Francisco	N/C							
9	County of Alameda	N/C							
10	County of Contra Costa	N/C							
11	County of Fresno	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 108,135	\$ 106,673
% County of San Diego Above/Below	9.9%	11.1%
Number of Matches	6	6

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Health Information Management Clerk									
1	City and County of San Francisco	Medical Records Clerk	\$ 65,448	\$ 79,584	-17.4%	\$ 65,736	7/1/2021	1/8/2022	.50%
2	County of Alameda	Medical Clerk	\$ 50,153	\$ 59,374	-11.4%	\$ 52,606	6/27/2021	6/26/2022	3.25%
3	County of San Bernardino	Health Information Management Assistant II	\$ 33,779	\$ 46,363	1.9%	\$ 47,244	7/31/2021	7/30/2022	3.00%
5	County of Contra Costa	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Los Angeles	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 59,374	\$ 52,606
% County of San Diego Above/Below	-37.8%	-22.1%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Health Information Management Technician									
1	County of San Mateo	Medical Records Technician II	\$ 62,420	\$ 78,061	-17.5%	\$ 64,400	10/4/2020	unknown	unknown
2	County of Alameda	Medical Records Technician	\$ 57,744	\$ 68,435	-11.4%	\$ 60,633	6/27/2021	6/26/2022	3.25%
3	County of Contra Costa	Medical Records Technician	\$ 49,111	\$ 62,716	-11.1%	\$ 55,755	7/1/2021	unknown	unknown
4	County of Sacramento	Medical Records Technician	\$ 41,196	\$ 50,091	0.1%	\$ 50,141	6/21/2020	unknown	unknown
5	County of Ventura	Records Technician II	\$ 35,249	\$ 49,293	-0.7%	\$ 48,948	12/27/2020	12/26/2021	2.00%
7	City and County of San Francisco	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Los Angeles	N/C							
11	County of Orange	N/C							
12	County of Riverside	N/C							
13	County of San Bernardino	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 62,716	\$ 55,755
% County of San Diego Above/Below	-32.3%	-17.6%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Health Information Specialist I									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Health Education Associate	\$ 72,933	\$ 88,207	-16.8%	\$ 73,388	6/14/2021	6/13/2022	3.00%
2	County of San Bernardino	Health Education Specialist I	\$ 48,090	\$ 66,123	1.9%	\$ 67,380	7/31/2021	7/30/2022	3.00%
3	County of San Diego	Health Information Specialist I	\$ 54,725	\$ 67,226		\$ 67,226	6/18/2021	unknown	unknown
4	County of Orange	Health Education Associate	\$ 49,358	\$ 65,936	-2.0%	\$ 64,617	7/2/2021	7/1/2022	3.50%
5	County of Riverside	Health Education Assistant II	\$ 39,127	\$ 58,006	1.9%	\$ 59,108	5/1/2021	5/1/2022	2.00%
6	County of Kern	Health Education Assistant I	\$ 32,712	\$ 39,924	1.2%	\$ 40,403	4/21/2021	unknown	unknown
7	City and County of San Francisco	N/C							
8	County of Alameda	N/C							
9	County of Contra Costa	N/C							
10	County of Fresno	N/C							
11	County of Los Angeles	N/C							
12	County of Sacramento	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 65,936	\$ 64,617
% County of San Diego Above/Below	1.9%	3.9%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Health Information Specialist II									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Mateo	Community Health Planner	\$ 87,795	\$ 109,780	-17.5%	\$ 90,569	10/4/2020	unknown	unknown
2	County of Santa Clara	Health Education Specialist	\$ 89,037	\$ 107,723	-16.8%	\$ 89,626	6/14/2021	6/13/2022	3.00%
3	County of Riverside	Health Educator	\$ 52,756	\$ 78,075	1.9%	\$ 79,558	5/1/2021	5/1/2022	2.00%
4	County of Los Angeles	Health Educator	\$ 67,060	\$ 81,082	-3.8%	\$ 78,001	1/1/2021	unknown	unknown
5	County of San Diego	Health Information Specialist II	\$ 62,067	\$ 76,253		\$ 76,253	6/18/2021	unknown	unknown
6	County of Orange	Health Information Specialist	\$ 56,410	\$ 75,691	-2.0%	\$ 74,177	7/2/2021	7/1/2022	3.50%
7	County of San Bernardino	Health Education Specialist II	\$ 51,771	\$ 71,032	1.9%	\$ 72,382	7/31/2021	7/30/2022	3.00%
8	County of Alameda	Health Educator I	\$ 63,864	\$ 72,743	-11.4%	\$ 64,451	6/27/2021	6/26/2022	3.25%
9	County of Sacramento	Health Education Assistant	\$ 46,876	\$ 56,982	0.1%	\$ 57,039	6/21/2020	unknown	unknown
10	County of Kern	Health Education Assistant II	\$ 36,144	\$ 44,112	1.2%	\$ 44,641	4/21/2021	unknown	unknown
11	City and County of San Francisco	N/C							
12	County of Contra Costa	N/C							
13	County of Fresno	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 75,691	\$ 74,177
% County of San Diego Above/Below	0.7%	2.7%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Health Services Social Worker									
1	City and County of San Francisco	Medical Social Worker	\$ 95,676	\$ 116,244	-17.4%	\$ 96,018	7/1/2021	1/8/2022	.50%
2	County of Los Angeles	Clinical Social Worker	\$ 73,465	\$ 93,779	-3.8%	\$ 90,215	1/1/2021	unknown	unknown
3	County of Contra Costa	Medical Social Worker II	\$ 81,179	\$ 98,674	-11.1%	\$ 87,721	7/1/2021	unknown	unknown
4	County of Sacramento	Human Services Social Worker - Master's Degree	\$ 72,015	\$ 87,529	0.1%	\$ 87,616	6/21/2020	unknown	unknown
5	County of Santa Clara	Medical Social Worker I	\$ 85,617	\$ 103,640	-16.8%	\$ 86,229	6/14/2021	6/13/2022	3.00%
6	County of Alameda	Medical Social Worker II	\$ 86,414	\$ 94,689	-11.4%	\$ 83,894	6/27/2021	6/26/2022	3.25%
7	County of San Bernardino	Social Service Practitioner II	\$ 57,554	\$ 81,078	1.9%	\$ 82,619	3/13/2021	3/26/2022	3.00%
8	County of Riverside	Medical Social Worker II - Per Diem	\$ 76,120	\$ 76,120	1.9%	\$ 77,566	5/1/2021	5/1/2022	2.00%
9	County of Fresno	Medical Social Worker II	\$ 57,356	\$ 73,372	4.7%	\$ 76,820	11/2/2020	unknown	unknown
11	County of Kern	Medical Social Worker II	\$ 57,468	\$ 70,152	1.2%	\$ 70,994	4/21/2021	unknown	unknown
12	County of Orange	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 90,654	\$ 85,062
% County of San Diego Above/Below	-21.0%	-13.5%
Number of Matches	10	10

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

HHSA Contract Auditor									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Los Angeles	Contract Program Auditor	\$ 70,803	\$ 95,415	-3.8%	\$ 91,790	1/1/2021	unknown	unknown
2	County of San Mateo	Internal Auditor II	\$ 80,432	\$ 100,566	-17.5%	\$ 82,967	10/4/2020	unknown	unknown
3	County of San Diego	HHSA Contract Auditor	\$ 62,192	\$ 81,557		\$ 81,557	6/18/2021	unknown	unknown
4	County of Sacramento	Auditor	\$ 65,960	\$ 80,179	0.1%	\$ 80,259	6/21/2020	unknown	unknown
5	County of Fresno	Financial Analyst II	\$ 54,080	\$ 65,728	4.7%	\$ 68,817	4/19/2021	unknown	unknown
6	County of Orange	Contract Services Monitor	\$ 49,851	\$ 67,246	-2.0%	\$ 65,902	7/2/2021	7/1/2022	3.50%
7	City and County of San Francisco	N/C							
8	County of Alameda	N/C							
9	County of Contra Costa	N/C							
10	County of Kern	N/C							
11	County of Riverside	N/C							
12	County of San Bernardino	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 80,179	\$ 80,259
% County of San Diego Above/Below	1.7%	1.6%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Histology Technician									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Histologic Technician	\$ 83,192	\$ 117,154	-16.8%	\$ 97,472	10/21/2020	10/20/2021	3.00%
2	County of Riverside	Histology Technician	\$ 55,008	\$ 81,449	1.9%	\$ 82,997	5/1/2021	5/1/2022	2.00%
3	County of Contra Costa	Histotechnician	\$ 67,260	\$ 81,755	-11.1%	\$ 72,680	7/1/2021	unknown	unknown
4	County of Los Angeles	Tissue Analysis Technician I	\$ 53,983	\$ 72,750	-3.8%	\$ 69,985	1/1/2021	unknown	unknown
5	County of San Bernardino	Histology Technician	\$ 47,736	\$ 65,603	1.9%	\$ 66,850	7/31/2021	7/30/2022	3.00%
6	County of Ventura	Histologist	\$ 45,018	\$ 62,904	-0.7%	\$ 62,463	12/26/2020	12/27/2021	2.00%
7	County of San Diego	Histology Technician	\$ 49,525	\$ 60,882		\$ 60,882	6/18/2021	unknown	unknown
8	County of Kern	Histologic Technician	\$ 43,464	\$ 53,064	1.2%	\$ 53,701	4/21/2021	unknown	unknown
9	City and County of San Francisco	N/C							
10	County of Alameda	N/C							
11	County of Fresno	N/C							
12	County of Orange	N/C							
13	County of Sacramento	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 72,750	\$ 69,985
% County of San Diego Above/Below	-19.5%	-15.0%
Number of Matches	7	7

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Historian									
1	County of Los Angeles	Curator, Natural History	\$ 88,172	\$ 118,819	-3.8%	\$ 114,304	1/1/2021	unknown	unknown
2	County of Riverside	Historic Preservation Officer - Parks	\$ 66,821	\$ 98,795	1.9%	\$ 100,672	5/1/2021	5/1/2022	2.00%
4	County of Orange	Archivist	\$ 53,414	\$ 71,531	-2.0%	\$ 70,101	7/2/2021	7/1/2022	3.50%
5	City and County of San Francisco	N/C							
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 98,795	\$ 100,672
% County of San Diego Above/Below	-8.1%	-10.1%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Housing Aide*									
1	Housing Authority County of Santa Clara	Housing Assistant	\$ 53,913	\$ 72,248	-16.8%	\$ 60,110	5/15/2021	unknown	unknown
2	Area Housing Authority of the County of Ventura ¹	[Eligibility Specialist/ Occupancy Specialist]	\$ 46,946	\$ 57,738	-1.1%	\$ 57,103	7/8/2021	unknown	unknown
3	Housing Authority County of San Bernardino ³	[Administrative Services Specialist/ Affordable Housing Specialist]	\$ 42,159	\$ 54,807	1.9%	\$ 55,848	4/20/2021	unknown	unknown
4	Housing Authority Contra Costa County	Housing Assistant	\$ 49,032	\$ 59,592	-11.1%	\$ 52,977	6/27/2020	unknown	unknown
5	Fresno Housing Authority ²	[Office Assistant II - Case Management/ Housing Specialist]	\$ 40,704	\$ 49,476	4.7%	\$ 51,801	1/1/2021	unknown	unknown
6	Sacramento Housing and Redevelopment Agency	Housing Assistant	\$ 36,676	\$ 46,809	0.1%	\$ 46,856	1/4/2021	unknown	unknown
8	County of Ventura	N/C							
9	County of Contra Costa	N/C							
10	San Francisco Housing Authority	N/C							
11	Los Angeles County Development Authority	N/C							
12	City and County of San Francisco	N/C							
13	County of Santa Clara	N/C							
14	County of Los Angeles	N/C							
15	County of Alameda	N/C							
16	County of Orange	N/C							
17	Housing Authority County of Kern	N/C							
18	County of Fresno	N/C							
19	County of Kern	N/C							
20	County of Riverside	N/C							
21	County of San Bernardino	N/C							
22	County of San Mateo	N/C							
23	County of Sacramento	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 56,273	\$ 54,413
% County of San Diego Above/Below	-23.7%	-19.6%
Number of Matches	6	6

N/C - Non Comparator

1 - Area Housing Authority of the County of Ventura: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the same for both matches.

2 - Fresno Housing Authority: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

3 - Housing Authority County of San Bernardino: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Housing Program Analyst I*									
2	Sacramento Housing and Redevelopment Agency	Redevelopment Analyst - Range 1	\$ 61,492	\$ 78,481	0.1%	\$ 78,559	1/2/2021	unknown	unknown
3	Housing Authority County of San Bernardino ¹	[Real Estate Services Specialist/ Management Analyst]	\$ 58,701	\$ 76,311	1.9%	\$ 77,761	4/20/2021	unknown	unknown
4	County of San Mateo	Housing/Community Development Specialist I	\$ 72,632	\$ 90,832	-17.5%	\$ 74,936	10/4/2020	unknown	unknown
5	County of San Bernardino	Economic and Community Development Analyst Trainee	\$ 51,759	\$ 69,306	1.9%	\$ 70,622	7/31/2021	7/30/2022	3.00%
6	Fresno Housing Authority	Community Development Coordinator	\$ 44,000	\$ 66,500	4.7%	\$ 69,626	1/1/2021	unknown	unknown
7	County of Orange	Research Analyst I	\$ 48,942	\$ 65,354	-2.0%	\$ 64,046	7/2/2021	7/1/2022	3.50%
8	Los Angeles County Development Authority	Development Specialist I	\$ 48,696	\$ 63,927	-2.7%	\$ 62,201	1/1/2021	unknown	unknown
9	Housing Authority County of Santa Clara	N/C							
10	County of Ventura	N/C							
11	Area Housing Authority of the County of Ventura	N/C							
12	San Francisco Housing Authority	N/C							
13	County of Contra Costa	N/C							
14	County of Santa Clara	N/C							
15	County of Alameda	N/C							
16	County of Los Angeles	N/C							
17	County of Fresno	N/C							
18	County of Kern	N/C							
19	County of Sacramento	N/C							
20	Housing Authority Contra Costa County	N/C							
21	County of Riverside	N/C							
22	City and County of San Francisco	N/C							
23	Housing Authority County of Kern	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 69,306	\$ 70,622
% County of San Diego Above/Below	14.4%	12.7%
Number of Matches	7	7

N/C - Non Comparator

1 - Housing Authority County of San Bernardino: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Housing Program Analyst II*									
1	Housing Authority County of San Bernardino ¹	[Management Analyst/ Project Manager - Real Estate]	\$ 88,002	\$ 114,403	1.9%	\$ 116,577	4/20/2021	unknown	unknown
2	Housing Authority County of Santa Clara ²	[Housing Policy Analyst/ Assistant Project Manager]	\$ 92,814	\$ 124,380	-16.8%	\$ 103,484	5/15/2021	unknown	unknown
3	County of San Bernardino	Economic and Community Development Analyst II	\$ 65,998	\$ 90,750	1.9%	\$ 92,475	7/31/2021	7/30/2022	3.00%
5	County of San Mateo	Housing/Community Development Specialist II	\$ 86,173	\$ 107,679	-17.5%	\$ 88,836	10/4/2020	unknown	unknown
6	Sacramento Housing and Redevelopment Agency	Redevelopment Analyst - Range 2	\$ 67,795	\$ 86,525	0.1%	\$ 86,612	1/2/2021	unknown	unknown
7	Housing Authority County of Kern	Planning and Development Specialist	\$ 69,804	\$ 85,212	1.2%	\$ 86,235	4/14/2021	unknown	unknown
8	Fresno Housing Authority	Community Development Analyst	\$ 50,000	\$ 78,500	4.7%	\$ 82,190	1/1/2021	unknown	unknown
9	Los Angeles County Development Authority	Development Specialist II	\$ 54,111	\$ 76,718	-2.7%	\$ 74,646	1/1/2021	unknown	unknown
10	County of Orange	Research Analyst II	\$ 54,330	\$ 72,717	-2.0%	\$ 71,262	7/2/2021	7/1/2022	3.50%
11	City and County of San Francisco	N/C							
12	County of Ventura	N/C							
13	Area Housing Authority of the County of Ventura	N/C							
14	San Francisco Housing Authority	N/C							
15	County of Contra Costa	N/C							
16	County of Sacramento	N/C							
17	County of Santa Clara	N/C							
18	County of Los Angeles	N/C							
19	County of Riverside	N/C							
20	County of Fresno	N/C							
21	County of Kern	N/C							
22	Housing Authority Contra Costa County	N/C							
23	County of Alameda	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 86,525	\$ 86,612
% County of San Diego Above/Below	3.1%	3.0%
Number of Matches	9	9

N/C - Non Comparator

1 - Housing Authority County of San Bernardino: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

2 - Housing Authority County of Santa Clara: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Housing Program Analyst III*									
1	Housing Authority County of San Bernardino ¹	[Senior Management Analyst/ Real Estate Development Manager]	\$ 99,567	\$ 129,436	1.9%	\$ 131,895	4/20/2021	unknown	unknown
2	Housing Authority County of Santa Clara ²	[Senior Housing Policy Analyst/ Project Manager]	\$ 103,730	\$ 139,008	-16.8%	\$ 115,655	5/15/2021	unknown	unknown
3	Los Angeles County Development Authority	Development Specialist IV	\$ 80,241	\$ 113,719	-2.7%	\$ 110,649	1/1/2021	unknown	unknown
4	County of San Mateo	Housing/Community Development Specialist III	\$ 98,652	\$ 123,342	-17.5%	\$ 101,757	10/4/2020	unknown	unknown
5	Sacramento Housing and Redevelopment Agency	Redevelopment Analyst - Range 3	\$ 78,481	\$ 100,163	0.1%	\$ 100,263	1/2/2021	unknown	unknown
7	Fresno Housing Authority	Senior Development Analyst- Special Projects	\$ 54,000	\$ 83,700	4.7%	\$ 87,634	1/1/2021	unknown	unknown
8	County of Orange	Research Analyst III	\$ 65,354	\$ 88,088	-2.0%	\$ 86,326	7/2/2021	7/1/2022	3.50%
9	Housing Authority Contra Costa County	Housing Development Officer	\$ 77,820	\$ 94,596	-11.1%	\$ 84,096	6/27/2020	unknown	unknown
10	County of Ventura	N/C							
11	Area Housing Authority of the County of Ventura	N/C							
12	County of Santa Clara	N/C							
13	City and County of San Francisco	N/C							
14	San Francisco Housing Authority	N/C							
15	County of Contra Costa	N/C							
16	County of Sacramento	N/C							
17	Housing Authority County of Kern	N/C							
18	County of Los Angeles	N/C							
19	County of Fresno	N/C							
20	County of Riverside	N/C							
21	County of San Bernardino	N/C							
22	County of Kern	N/C							
23	County of Alameda	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 106,941	\$ 101,010
% County of San Diego Above/Below	-11.7%	-5.5%
Number of Matches	8	8

N/C - Non Comparator

1 - Housing Authority County of San Bernardino: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

2 - Housing Authority County of Santa Clara: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Housing Program Analyst IV*									
1	Los Angeles County Development Authority	Consultant II	\$ 88,110	\$ 134,393	-2.7%	\$ 130,764	1/1/2021	unknown	unknown
2	Sacramento Housing and Redevelopment Agency ²	[Redevelopment Analyst - Range 3/ Redevelopment Manager]	\$ 89,136	\$ 127,485	0.1%	\$ 127,612	1/4/2021	unknown	unknown
3	Housing Authority County of Santa Clara ¹	[Senior Housing Policy Analyst/ Project Manager]	\$ 105,011	\$ 140,725	-16.8%	\$ 117,083	5/15/2021	unknown	unknown
4	County of San Mateo	Housing and Community Development Supervisor	\$ 112,297	\$ 140,376	-17.5%	\$ 115,811	10/4/2020	unknown	unknown
5	County of Orange	Senior Research Analyst	\$ 81,182	\$ 109,158	-2.0%	\$ 106,975	7/2/2021	7/1/2022	3.50%
6	County of San Bernardino	Supervising Economic and Community Development Analysts	\$ 74,526	\$ 102,502	1.9%	\$ 104,450	7/31/2021	7/30/2022	3.00%
8	San Francisco Housing Authority	Program Manager II	\$ 90,454	\$ 109,954	-17.4%	\$ 90,822	6/10/2021	unknown	unknown
9	County of Ventura	N/C							
10	County of Contra Costa	N/C							
11	City and County of San Francisco	N/C							
12	County of Santa Clara	N/C							
13	Fresno Housing Authority	N/C							
14	Area Housing Authority of the County of Ventura	N/C							
15	County of Alameda	N/C							
16	County of Los Angeles	N/C							
17	Housing Authority County of Kern	N/C							
18	County of Fresno	N/C							
19	Housing Authority County of San Bernardino	N/C							
20	County of Riverside	N/C							
21	County of Kern	N/C							
22	County of Sacramento	N/C							
23	Housing Authority Contra Costa County	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 127,485	\$ 115,811
% County of San Diego Above/Below	-22.2%	-11.0%
Number of Matches	7	7

N/C - Non Comparator

1 - Housing Authority County of Santa Clara: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

2 - Sacramento Housing and Redevelopment Agency: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Housing Specialist I*									
1	Housing Authority County of Santa Clara ¹	[Housing Assistant/ Housing Programs Specialist]	\$ 56,711	\$ 75,998	-16.8%	\$ 63,230	5/15/2021	unknown	unknown
2	County of Orange	Housing Specialist I	\$ 44,366	\$ 59,738	-2.0%	\$ 58,543	7/2/2021	7/1/2022	3.50%
4	Fresno Housing Authority	Housing Specialist	\$ 43,926	\$ 53,392	4.7%	\$ 55,902	1/1/2021	unknown	unknown
5	Los Angeles County Development Authority	Program Specialist I	\$ 41,320	\$ 55,896	-2.7%	\$ 54,387	1/1/2021	unknown	unknown
6	San Francisco Housing Authority	Eligibility Worker I	\$ 52,589	\$ 63,934	-17.4%	\$ 52,809	6/10/2021	unknown	unknown
7	Sacramento Housing and Redevelopment Agency	Housing Program Technician I	\$ 40,418	\$ 51,584	0.1%	\$ 51,636	1/2/2021	unknown	unknown
8	Housing Authority County of Kern	Housing Specialist I	\$ 35,244	\$ 43,032	1.2%	\$ 43,548	4/14/2021	unknown	unknown
9	Area Housing Authority of the County of Ventura	N/C							
10	County of Fresno	N/C							
11	County of Los Angeles	N/C							
12	County of Ventura	N/C							
13	County of Santa Clara	N/C							
14	City and County of San Francisco	N/C							
15	County of Contra Costa	N/C							
16	County of Alameda	N/C							
17	County of Kern	N/C							
18	County of Sacramento	N/C							
19	Housing Authority County of San Bernardino	N/C							
20	County of Riverside	N/C							
21	County of San Bernardino	N/C							
22	County of San Mateo	N/C							
23	Housing Authority Contra Costa County	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 55,896	\$ 54,387
% County of San Diego Above/Below	0.9%	3.6%
Number of Matches	7	7

N/C - Non Comparator

1 - Housing Authority County of Santa Clara: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Housing Specialist II*									
2	Housing Authority County of Santa Clara	Housing Programs Specialist	\$ 59,509	\$ 79,748	-16.8%	\$ 66,351	5/15/2021	unknown	unknown
3	County of Orange	Housing Specialist II	\$ 48,090	\$ 64,813	-2.0%	\$ 63,517	7/2/2021	7/1/2022	3.50%
4	Los Angeles County Development Authority	Program Specialist II	\$ 45,940	\$ 65,133	-2.7%	\$ 63,375	1/1/2021	unknown	unknown
5	Housing Authority Contra Costa County	Housing Program Specialist	\$ 57,096	\$ 69,396	-11.1%	\$ 61,693	6/27/2020	unknown	unknown
6	Housing Authority County of San Bernardino	Affordable Housing Specialist	\$ 46,310	\$ 60,203	1.9%	\$ 61,347	4/20/2021	unknown	unknown
7	Fresno Housing Authority	Leasing Specialist	\$ 47,506	\$ 57,743	4.7%	\$ 60,457	1/1/2021	unknown	unknown
8	Area Housing Authority of the County of Ventura	Senior Housing Technician	\$ 49,027	\$ 60,297	-1.1%	\$ 59,634	7/8/2021	unknown	unknown
9	Sacramento Housing and Redevelopment Agency	Housing Program Technician II	\$ 44,560	\$ 56,872	0.1%	\$ 56,929	1/2/2021	unknown	unknown
10	San Francisco Housing Authority	Eligibility Worker II	\$ 56,056	\$ 68,146	-17.4%	\$ 56,289	6/10/2021	unknown	unknown
11	Housing Authority County of Kern	Housing Specialist II	\$ 38,940	\$ 47,544	1.2%	\$ 48,115	4/14/2021	unknown	unknown
12	County of Fresno	N/C							
13	County of Contra Costa	N/C							
14	City and County of San Francisco	N/C							
15	County of Santa Clara	N/C							
16	County of Los Angeles	N/C							
17	County of San Mateo	N/C							
18	County of Ventura	N/C							
19	County of Kern	N/C							
20	County of Sacramento	N/C							
21	County of Alameda	N/C							
22	County of Riverside	N/C							
23	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 62,555	\$ 60,902
% County of San Diego Above/Below	6.3%	8.8%
Number of Matches	10	10

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Housing Specialist III*									
1	Housing Authority County of Santa Clara	Housing Programs Supervisor	\$ 92,814	\$ 124,380	-16.8%	\$ 103,484	5/15/2021	unknown	unknown
2	Sacramento Housing and Redevelopment Agency	Supervisor - Housing Authority	\$ 64,326	\$ 99,790	0.1%	\$ 99,890	1/4/2021	unknown	unknown
3	Housing Authority County of San Bernardino	Housing Services Supervisor	\$ 70,466	\$ 91,606	1.9%	\$ 93,346	4/20/2021	unknown	unknown
4	Los Angeles County Development Authority	Program Specialist IV	\$ 63,762	\$ 93,758	-2.7%	\$ 91,227	1/1/2021	unknown	unknown
5	Area Housing Authority of the County of Ventura	HCV/Section 8 Supervisor	\$ 69,170	\$ 89,922	-1.1%	\$ 88,932	7/8/2021	unknown	unknown
6	Fresno Housing Authority	Supervisor - Intake, Leasing & Case Management	\$ 50,000	\$ 78,500	4.7%	\$ 82,190	1/1/2021	unknown	unknown
8	Housing Authority Contra Costa County ¹	[Housing Program Specialist/ Housing Manager]	\$ 64,980	\$ 78,978	-11.1%	\$ 70,211	6/27/2020	unknown	unknown
9	County of Orange	Housing Specialist III	\$ 52,166	\$ 70,325	-2.0%	\$ 68,918	7/2/2021	7/1/2022	3.50%
10	San Francisco Housing Authority ³	[Eligibility Worker II/ Program Manager I]	\$ 60,879	\$ 74,009	-17.4%	\$ 61,131	6/10/2021	unknown	unknown
11	Housing Authority County of Kern ²	[Housing Specialist II/ Housing Programs Administrator]	\$ 49,224	\$ 60,096	1.2%	\$ 60,817	4/14/2021	unknown	unknown
12	County of Los Angeles	N/C							
13	County of Santa Clara	N/C							
14	County of Fresno	N/C							
15	City and County of San Francisco	N/C							
16	County of Contra Costa	N/C							
17	County of Alameda	N/C							
18	County of Ventura	N/C							
19	County of Kern	N/C							
20	County of Sacramento	N/C							
21	County of Riverside	N/C							
22	County of San Bernardino	N/C							
23	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 84,450	\$ 85,561
% County of San Diego Above/Below	-9.5%	-11.0%
Number of Matches	10	10

N/C - Non Comparator

1 - Housing Authority Contra Costa County: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

2 - Housing Authority County of Kern: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

3 - San Francisco Housing Authority: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Human Services Control Specialist									
1	County of Sacramento	Human Services Program Integrity Specialist	\$ 72,454	\$ 88,051	0.1%	\$ 88,139	6/21/2020	unknown	unknown
2	City and County of San Francisco	Program Specialist	\$ 87,540	\$ 106,416	-17.4%	\$ 87,900	7/1/2021	1/8/2022	.50%
3	County of Santa Clara	Eligibility Examiner	\$ 82,653	\$ 100,004	-16.8%	\$ 83,204	6/14/2021	6/13/2022	3.00%
4	County of Alameda	Quality Assurance/Quality Control Technician	\$ 72,738	\$ 88,130	-11.4%	\$ 78,083	12/27/2020	12/26/2021	3.00%
5	County of San Mateo	Benefits Analyst III	\$ 70,323	\$ 87,899	-17.5%	\$ 72,517	10/4/2020	unknown	unknown
6	County of Contra Costa	Social Service Program Assistant	\$ 63,999	\$ 77,791	-11.1%	\$ 69,156	7/1/2021	unknown	unknown
8	County of San Bernardino	Human Services System Quality Review Specialist	\$ 42,224	\$ 58,032	1.9%	\$ 59,135	7/31/2021	7/30/2022	3.00%
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of Los Angeles	N/C							
12	County of Orange	N/C							
13	County of Riverside	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 88,051	\$ 78,083
% County of San Diego Above/Below	-45.7%	-29.2%
Number of Matches	7	7

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Human Services Specialist									
1	City and County of San Francisco	Program Specialist	\$ 87,540	\$ 106,416	-17.4%	\$ 87,900	7/1/2021	1/8/2022	.50%
2	County of Santa Clara	Eligibility Worker II	\$ 67,608	\$ 81,667	-16.8%	\$ 67,947	6/14/2021	6/13/2022	3.00%
3	County of San Mateo	Benefits Analyst II	\$ 65,415	\$ 81,805	-17.5%	\$ 67,489	10/4/2020	unknown	unknown
4	County of Sacramento	Human Services Specialist II	\$ 53,787	\$ 65,375	0.1%	\$ 65,440	6/21/2020	unknown	unknown
5	County of Alameda ¹	[Eligibility Services Technician II/ Eligibility Services Technician III]	\$ 58,910	\$ 71,614	-11.4%	\$ 63,450	6/27/2021	6/26/2022	3.25%
6	County of Riverside	Eligibility Technician II	\$ 37,546	\$ 58,606	1.9%	\$ 59,720	5/1/2021	5/1/2022	2.00%
8	County of Los Angeles	Eligibility Worker II	\$ 46,242	\$ 58,992	-3.8%	\$ 56,750	1/1/2021	unknown	unknown
9	County of Orange	Eligibility Technician	\$ 42,515	\$ 57,450	-2.0%	\$ 56,301	7/2/2021	7/1/2022	3.50%
10	County of San Bernardino	Eligibility Worker II	\$ 37,710	\$ 51,792	1.9%	\$ 52,776	7/31/2021	7/30/2022	3.00%
11	County of Contra Costa	Eligibility Worker II	\$ 48,312	\$ 58,723	-11.1%	\$ 52,205	7/1/2021	unknown	unknown
12	County of Ventura	HS Client Benefit Specialist II	\$ 50,155	\$ 52,535	-0.7%	\$ 52,167	12/27/2020	12/26/2021	2.00%
13	County of Kern	Human Services Technician III	\$ 38,748	\$ 47,304	1.2%	\$ 47,872	4/21/2021	unknown	unknown
14	County of Fresno	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 58,857	\$ 58,235
% County of San Diego Above/Below	-2.4%	-1.3%
Number of Matches	12	12

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Hydrogeologist									
1	County of Santa Clara	Environmental Health Geologist/Engineer	\$ 134,549	\$ 163,966	-16.8%	\$ 136,420	10/21/2020	10/20/2021	3.00%
3	County of Kern	Engineer II	\$ 69,108	\$ 84,372	1.2%	\$ 85,384	4/21/2021	unknown	unknown
4	City and County of San Francisco	N/C							
5	County of Alameda	N/C							
6	County of Contra Costa	N/C							
7	County of Fresno	N/C							
8	County of Los Angeles	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 124,169	\$ 110,902
% County of San Diego Above/Below	-13.4%	-1.3%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Hydrographic Instrument Technician									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Diego	Hydrographic Instrument Technician	\$ 63,003	\$ 77,376		\$ 77,376	6/18/2021	unknown	unknown
2	City and County of San Francisco	N/C							
3	County of Alameda	N/C							
4	County of Contra Costa	N/C							
5	County of Fresno	N/C							
6	County of Kern	N/C							
7	County of Los Angeles	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	N/A	N/A
% County of San Diego Above/Below	N/A	N/A
Number of Matches	0	0

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Imaging Technician I									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Ventura	Imaging Specialist I	\$ 35,073	\$ 49,085	-0.7%	\$ 48,741	12/26/2020	12/27/2021	2.00%
2	County of San Diego	Imaging Technician I	\$ 38,480	\$ 47,320		\$ 47,320	6/18/2021	unknown	unknown
3	County of Sacramento	Imaging Specialist I	\$ 37,438	\$ 45,518	0.1%	\$ 45,564	6/21/2020	unknown	unknown
4	County of Orange	Micrographics Technician I	\$ 34,154	\$ 44,595	-2.0%	\$ 43,703	7/2/2021	7/1/2022	3.50%
5	County of Alameda	Microfilm Technician Trainee	\$ 41,798	\$ 47,073	-11.4%	\$ 41,706	6/27/2021	6/26/2022	3.25%
6	City and County of San Francisco	N/C							
7	County of Contra Costa	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Los Angeles	N/C							
11	County of Riverside	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 46,295	\$ 44,633
% County of San Diego Above/Below	2.2%	5.7%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Imaging Technician II									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Ventura	Imaging Specialist II	\$ 38,270	\$ 53,715	-0.7%	\$ 53,339	12/26/2020	12/27/2021	2.00%
2	County of San Diego	Imaging Technician II	\$ 43,056	\$ 52,936		\$ 52,936	6/18/2021	unknown	unknown
3	County of San Bernardino	Archives Technician	\$ 36,754	\$ 50,482	1.9%	\$ 51,441	7/31/2021	7/30/2022	3.00%
4	County of Sacramento	Imaging Specialist II	\$ 40,006	\$ 48,650	0.1%	\$ 48,699	6/21/2020	unknown	unknown
5	County of Alameda	Microfilm Technician	\$ 46,227	\$ 54,562	-11.4%	\$ 48,342	6/27/2021	6/26/2022	3.25%
6	County of Kern	Document Imaging Technician	\$ 29,460	\$ 35,964	1.2%	\$ 36,396	4/21/2021	unknown	unknown
7	City and County of San Francisco	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Los Angeles	N/C							
11	County of Orange	N/C							
12	County of Riverside	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 50,482	\$ 48,699
% County of San Diego Above/Below	4.6%	8.0%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Imaging Technician III									
1	County of Santa Clara	Supervising Recordable Document Technician	\$ 63,012	\$ 76,623	-16.8%	\$ 63,750	6/28/2021	6/27/2022	3.00%
3	County of Sacramento	Supervising Imaging Specialist	\$ 48,588	\$ 59,049	0.1%	\$ 59,108	6/21/2020	unknown	unknown
4	City and County of San Francisco	N/C							
5	County of Alameda	N/C							
6	County of Contra Costa	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Los Angeles	N/C							
10	County of Orange	N/C							
11	County of Riverside	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 67,836	\$ 61,429
% County of San Diego Above/Below	-11.9%	-1.3%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Industrial Hygienist I									
1	City and County of San Francisco	Assistant Industrial Hygienist	\$ 91,704	\$ 111,492	-17.4%	\$ 92,092	7/1/2021	1/8/2022	.50%
3	County of Riverside	Industrial Hygienist I	\$ 48,995	\$ 72,440	1.9%	\$ 73,816	5/1/2021	5/1/2022	2.00%
4	County of Fresno	Environmental Health Specialist I	\$ 49,062	\$ 59,618	4.7%	\$ 62,420	10/17/2019	unknown	unknown
5	County of Kern	Hazardous Materials Specialist I - Environmental Health	\$ 44,340	\$ 54,132	1.2%	\$ 54,782	4/21/2021	unknown	unknown
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Los Angeles	N/C							
9	County of Orange	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 66,029	\$ 68,118
% County of San Diego Above/Below	24.5%	22.1%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Industrial Hygienist II									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Industrial Hygienist	\$ 121,704	\$ 147,912	-17.4%	\$ 122,175	7/1/2021	1/8/2022	.50%
2	County of Sacramento	Industrial Hygienist	\$ 99,264	\$ 109,453	0.1%	\$ 109,562	6/21/2020	unknown	unknown
3	County of Alameda	Industrial Hygiene Engineer	\$ 103,020	\$ 118,483	-11.4%	\$ 104,976	6/27/2021	6/26/2022	3.25%
4	County of San Mateo	Hazardous Materials Specialist III	\$ 97,633	\$ 121,990	-17.5%	\$ 100,641	10/4/2020	unknown	unknown
5	County of Los Angeles	Industrial Hygienist	\$ 75,488	\$ 101,716	-3.8%	\$ 97,851	1/1/2021	unknown	unknown
6	County of San Diego	Industrial Hygienist II	\$ 78,978	\$ 97,074		\$ 97,074	6/18/2021	unknown	unknown
7	County of Orange	Industrial Hygienist	\$ 70,782	\$ 95,347	-2.0%	\$ 93,440	7/2/2021	7/1/2022	3.50%
8	County of Riverside	Industrial Hygienist II	\$ 59,372	\$ 87,913	1.9%	\$ 89,584	5/1/2021	5/1/2022	2.00%
9	County of Fresno	Environmental Health Specialist II	\$ 55,120	\$ 67,002	4.7%	\$ 70,151	10/17/2019	unknown	unknown
10	County of Kern	Hazardous Materials Specialist II	\$ 48,984	\$ 59,808	1.2%	\$ 60,526	4/21/2021	unknown	unknown
11	County of Contra Costa	N/C							
12	County of San Bernardino	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 101,716	\$ 97,851
% County of San Diego Above/Below	-4.8%	-0.8%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Industrial Hygienist III									
1	City and County of San Francisco	Senior Industrial Hygienist	\$ 134,186	\$ 175,396	-17.4%	\$ 144,877	7/1/2021	1/8/2022	.50%
2	County of Alameda ¹	[Industrial Hygiene Engineer/ Supervising Industrial Hygiene Engineer]	\$ 106,184	\$ 124,665	-11.4%	\$ 110,453	12/27/2020	unknown	unknown
4	County of Riverside	Industrial Hygienist III	\$ 62,479	\$ 92,488	1.9%	\$ 94,245	5/1/2021	5/1/2022	2.00%
5	County of Fresno	Environmental Health Specialist III	\$ 60,736	\$ 73,840	4.7%	\$ 77,310	10/17/2019	unknown	unknown
6	County of Kern	Hazardous Materials Specialist III	\$ 54,132	\$ 66,084	1.2%	\$ 66,877	4/21/2021	unknown	unknown
7	County of Contra Costa	N/C							
8	County of Los Angeles	N/C							
9	County of Orange	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results		
	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 92,488	\$ 94,245
% County of San Diego Above/Below	9.3%	7.5%
Number of Matches	5	5

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Insect Detection Specialist I									
1	County of Riverside	Environmental Health Technician I	\$ 36,977	\$ 57,710	1.9%	\$ 58,807	5/1/2021	5/1/2022	2.00%
2	County of Orange	Integrated Pest Management Technician I	\$ 35,755	\$ 48,152	-2.0%	\$ 47,189	7/2/2021	7/1/2022	3.50%
3	County of Ventura	Insect Detection Specialist I	\$ 29,411	\$ 42,307	-0.7%	\$ 42,011	12/26/2020	12/27/2021	2.00%
4	County of San Bernardino	Agricultural Field Aide I	\$ 30,243	\$ 41,205	1.9%	\$ 41,988	7/31/2021	7/30/2022	3.00%
6	County of Fresno	Agricultural Field Aide	\$ 29,458	\$ 30,940	4.7%	\$ 32,394	4/19/2021	unknown	unknown
7	City and County of San Francisco	N/C							
8	County of Alameda	N/C							
9	County of Contra Costa	N/C							
10	County of Kern	N/C							
11	County of Los Angeles	N/C							
12	County of Sacramento	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 42,307	\$ 42,011
% County of San Diego Above/Below	-7.4%	-6.7%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Insect Detection Specialist II									
1	City and County of San Francisco	Integrated Pest Management Specialist	\$ 82,392	\$ 100,128	-17.4%	\$ 82,706	7/1/2021	1/8/2022	.50%
2	County of Alameda	Agricultural and Standards Technician	\$ 57,744	\$ 70,347	-11.4%	\$ 62,328	6/27/2021	6/26/2022	3.25%
3	County of Riverside	Environmental Health Technician II	\$ 38,982	\$ 60,876	1.9%	\$ 62,032	5/1/2021	5/1/2022	2.00%
4	County of Orange	Integrated Pest Management Technician II	\$ 44,366	\$ 59,842	-2.0%	\$ 58,645	7/2/2021	7/1/2022	3.50%
5	County of San Mateo	Pest Detection Specialist	\$ 51,125	\$ 63,896	-17.5%	\$ 52,715	10/4/2020	unknown	unknown
7	County of Ventura	Insect Detection Specialist II	\$ 34,366	\$ 46,016	-0.7%	\$ 45,694	12/26/2020	12/27/2021	2.00%
8	County of San Bernardino	Agricultural Field Aide II	\$ 32,323	\$ 44,429	1.9%	\$ 45,273	7/31/2021	7/30/2022	3.00%
9	County of Contra Costa	N/C							
10	County of Fresno	N/C							
11	County of Kern	N/C							
12	County of Los Angeles	N/C							
13	County of Sacramento	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 60,876	\$ 58,645
% County of San Diego Above/Below	-30.9%	-26.1%
Number of Matches	7	7

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Inservice Education Coordinator									
1	County of Contra Costa	Health Services Education and Training Specialist	\$ 143,368	\$ 179,047	-11.1%	\$ 159,173	1/1/2021	unknown	unknown
2	County of Los Angeles	Assistant Program Specialist, Public Health Nursing	\$ 99,011	\$ 148,207	-3.8%	\$ 142,576	1/1/2021	unknown	unknown
3	County of Riverside	Nursing Education Instructor	\$ 80,837	\$ 119,987	1.9%	\$ 122,267	5/1/2021	5/1/2022	2.00%
5	City and County of San Francisco	N/C							
6	County of Alameda	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Orange	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 148,207	\$ 142,576
% County of San Diego Above/Below	-40.2%	-34.9%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

International Case Coordinator									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Diego	International Case Coordinator	\$ 93,662	\$ 115,024		\$ 115,024	6/18/2021	unknown	unknown
2	City and County of San Francisco	N/C							
3	County of Alameda	N/C							
4	County of Contra Costa	N/C							
5	County of Fresno	N/C							
6	County of Kern	N/C							
7	County of Los Angeles	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results		
	Top Annual	Adjusted Top Annual
Median of Comparators	N/A	N/A
% County of San Diego Above/Below	N/A	N/A
Number of Matches	0	0

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Investigative Specialist									
1	City and County of San Francisco	District Attorneys Investigative Assistant	\$ 75,216	\$ 95,988	-17.4%	\$ 79,286	7/1/2021	1/8/2022	.50%
2	County of Sacramento	Investigative Assistant	\$ 55,687	\$ 67,672	0.1%	\$ 67,740	6/21/2021	unknown	unknown
3	County of Orange	Investigative Assistant - Sheriff	\$ 49,358	\$ 65,936	-2.0%	\$ 64,617	7/2/2021	7/1/2022	3.50%
4	County of Ventura	Investigative Assistant II	\$ 38,366	\$ 53,899	-0.7%	\$ 53,521	12/26/2020	12/27/2021	2.00%
5	County of San Bernardino	Investigative Technician I	\$ 35,797	\$ 49,296	1.9%	\$ 50,233	7/31/2021	7/30/2022	3.00%
7	County of Fresno	Investigative Technician	\$ 37,882	\$ 46,046	4.7%	\$ 48,210	10/19/2020	unknown	unknown
8	County of Kern	Investigative Aide	\$ 35,604	\$ 43,464	1.2%	\$ 43,986	4/21/2021	unknown	unknown
9	County of Alameda	N/C							
10	County of Contra Costa	N/C							
11	County of Los Angeles	N/C							
12	County of Riverside	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 53,899	\$ 53,521
% County of San Diego Above/Below	-8.4%	-7.7%
Number of Matches	7	7

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Investigative Technician									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Orange	Investigative Technician I	\$ 61,027	\$ 82,181	-2.0%	\$ 80,537	7/2/2021	7/1/2022	3.50%
2	County of San Diego	Investigative Technician	\$ 64,771	\$ 79,622		\$ 79,622	6/18/2021	unknown	unknown
3	County of Los Angeles	Investigator, Photographer D.A.	\$ 61,065	\$ 82,285	-3.8%	\$ 79,158	1/1/2021	unknown	unknown
4	County of Riverside	Investigative Technician II	\$ 47,712	\$ 74,529	1.9%	\$ 75,945	5/1/2021	5/1/2022	2.00%
5	County of Kern	Investigative Technician II	\$ 46,608	\$ 56,892	1.2%	\$ 57,575	4/21/2021	unknown	unknown
6	City and County of San Francisco	N/C							
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 78,355	\$ 77,551
% County of San Diego Above/Below	1.6%	2.6%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Jr Air Pollution Chemist*									
2	South Coast Air Quality Management District	N/C							
3	Bay Area Air Quality Management District	N/C							
4	County of Orange	N/C							
5	County of Ventura	N/C							
6	Sacramento Metropolitan Air Quality Management District	N/C							
7	San Luis Obispo County Air Pollution Control District	N/C							
8	Imperial County Air Pollution Control District	N/C							
9	County of Contra Costa	N/C							
10	County of Sacramento	N/C							
11	City and County of San Francisco	N/C							
12	County of Santa Clara	N/C							
13	County of Los Angeles	N/C							
14	County of Fresno	N/C							
15	County of Kern	N/C							
16	County of Alameda	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	N/A	N/A
% County of San Diego Above/Below	N/A	N/A
Number of Matches	0	0

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Jr Air Pollution Control Engineer*									
1	South Coast Air Quality Management District	Assistant Air Quality Engineer	\$ 68,616	\$ 92,232	-2.8%	\$ 89,650	1/1/2020	unknown	unknown
3	Sacramento Metropolitan Air Quality Management District	N/C							
4	Bay Area Air Quality Management District	N/C							
5	County of Orange	N/C							
6	County of Ventura	N/C							
7	County of Contra Costa	N/C							
8	San Luis Obispo County Air Pollution Control District	N/C							
9	Imperial County Air Pollution Control District	N/C							
10	County of Sacramento	N/C							
11	City and County of San Francisco	N/C							
12	County of Santa Clara	N/C							
13	County of Los Angeles	N/C							
14	County of Fresno	N/C							
15	County of Kern	N/C							
16	County of Alameda	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 92,232	\$ 89,650
% County of San Diego Above/Below	-20.7%	-17.3%
Number of Matches	1	1

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Jr Land Use/Environmental Planner*									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Ventura	Planner I	\$ 53,349	\$ 74,818	-0.7%	\$ 74,294	12/27/2020	12/26/2021	2.00%
2	County of San Mateo	Planner I	\$ 67,952	\$ 84,987	-17.5%	\$ 70,114	10/4/2020	unknown	unknown
3	County of San Bernardino	Planner Trainee	\$ 50,440	\$ 67,704	1.9%	\$ 68,990	7/31/2021	7/30/2022	3.00%
4	County of San Diego	Jr Land Use/Environmental Planner*	\$ 54,038	\$ 66,352		\$ 66,352	6/18/2021	unknown	unknown
5	County of Contra Costa	Environmental Assistant	\$ 61,040	\$ 74,194	-11.1%	\$ 65,959	7/1/2021	unknown	unknown
6	County of Fresno	Planner I	\$ 48,698	\$ 62,270	4.7%	\$ 65,197	11/2/2020	unknown	unknown
7	City and County of San Francisco	N/C							
8	County of Alameda	N/C							
9	County of Kern	N/C							
10	County of Los Angeles	N/C							
11	County of Orange	N/C							
12	County of Riverside	N/C							
13	County of Sacramento	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 74,194	\$ 68,990
% County of San Diego Above/Below	-11.8%	-4.0%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Jr Public Health Microbiologist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Los Angeles	Clinical Microbiologist I	\$ 94,008	\$ 126,684	-3.8%	\$ 121,870	1/1/2021	unknown	unknown
2	City and County of San Francisco	Microbiologist I	\$ 86,892	\$ 122,330	-17.4%	\$ 101,045	7/1/2021	1/8/2022	.50%
3	County of Riverside	Public Health Microbiologist I	\$ 51,608	\$ 82,997	1.9%	\$ 84,574	5/1/2021	5/1/2022	2.00%
4	County of Ventura	Microbiologist I	\$ 59,833	\$ 83,687	-0.7%	\$ 83,101	12/27/2020	12/26/2021	2.00%
5	County of Alameda ¹	[Laboratory Technician/ Microbiologist]	\$ 71,770	\$ 85,585	-11.4%	\$ 75,829	6/27/2021	6/26/2022	3.25%
6	County of San Bernardino	Public Health Microbiologist I	\$ 52,187	\$ 69,950	1.9%	\$ 71,279	3/13/2021	3/26/2022	3.00%
7	County of Kern	Microbiologist Trainee	\$ 55,500	\$ 67,752	1.2%	\$ 68,565	4/21/2021	unknown	unknown
8	County of San Diego	Jr Public Health Microbiologist	\$ 51,168	\$ 62,858		\$ 62,858	6/18/2021	unknown	unknown
9	County of Fresno	Public Health Microbiologist Trainee	\$ 46,930	\$ 57,070	4.7%	\$ 59,752	10/17/2019	unknown	unknown
10	County of Orange	Public Health Microbiologist Trainee	\$ 38,688	\$ 52,166	-2.0%	\$ 51,123	7/2/2021	7/1/2022	3.50%
11	County of Contra Costa	Microbiologist Trainee	\$ 41,427	\$ 50,355	-11.1%	\$ 44,765	7/1/2021	unknown	unknown
12	County of Sacramento	Public Health Microbiologist Trainee	\$ 42,720	\$ 42,720	0.1%	\$ 42,763	6/21/2020	unknown	unknown
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 69,950	\$ 71,279
% County of San Diego Above/Below	-11.3%	-13.4%
Number of Matches	11	11

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Jr Real Property Agent									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Ventura	Real Property Agent I	\$ 54,588	\$ 77,352	-0.7%	\$ 76,810	12/27/2020	12/26/2021	2.00%
2	County of San Bernardino	Real Property Agent I	\$ 51,770	\$ 71,032	1.9%	\$ 72,382	7/31/2021	7/30/2022	3.00%
3	County of San Mateo ¹	Real Property Agent I	\$ 77,499	\$ 86,672	-17.5%	\$ 71,504	10/4/2020	unknown	unknown
4	County of Santa Clara	Junior Real Estate Agent	\$ 64,977	\$ 78,501	-16.8%	\$ 65,313	6/14/2021	6/13/2022	3.00%
5	County of Orange	Real Property Agent I	\$ 48,942	\$ 65,354	-2.0%	\$ 64,046	7/2/2021	7/1/2022	3.50%
6	County of Riverside	Real Property Agent I	\$ 39,882	\$ 58,957	1.9%	\$ 60,078	5/1/2021	5/1/2022	2.00%
7	County of Sacramento	Real Estate Specialist	\$ 46,771	\$ 56,877	0.1%	\$ 56,934	6/21/2020	unknown	unknown
8	County of Contra Costa	Junior Real Property Agent	\$ 48,177	\$ 58,560	-11.1%	\$ 52,060	7/1/2021	unknown	Unknown
9	County of San Diego	Jr Real Property Agent	\$ 42,328	\$ 52,042		\$ 52,042	6/18/2021	unknown	unknown
10	County of Los Angeles	Junior Real Property Agent	\$ 50,010	\$ 51,380	-3.8%	\$ 49,427	1/1/2021	unknown	unknown
11	City and County of San Francisco	N/C							
12	County of Alameda	N/C							
13	County of Fresno	N/C							
14	County of Kern	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 65,354	\$ 64,046
% County of San Diego Above/Below	-25.6%	-23.1%
Number of Matches	9	9

N/C - Non Comparator

1 - County of San Mateo: Bottom of range is step 3.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Jr Surveyor (T)									
1	County of Los Angeles	Survey Party Chief I	\$ 86,869	\$ 110,892	-3.8%	\$ 106,678	1/1/2021	unknown	unknown
2	County of Alameda ¹	[Survey Technician II/ Survey Technician III]	\$ 93,600	\$ 103,802	-11.4%	\$ 91,969	10/4/2020	10/3/2021	3.25%
3	County of Ventura	Surveyor I	\$ 56,570	\$ 85,221	-0.7%	\$ 84,624	1/10/2021	1/9/2022	2.00%
5	County of Orange	Surveyor I	\$ 59,738	\$ 80,538	-2.0%	\$ 78,927	7/2/2021	7/1/2022	3.50%
6	County of San Mateo	Public Works Technician II	\$ 75,565	\$ 94,451	-17.5%	\$ 77,922	10/4/2020	unknown	unknown
7	City and County of San Francisco	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 94,451	\$ 84,624
% County of San Diego Above/Below	-17.4%	-5.2%
Number of Matches	5	5

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Laboratory Assistant									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Laboratory Technician II	\$ 67,704	\$ 82,392	-17.4%	\$ 68,056	7/1/2021	1/8/2022	.50%
2	County of Santa Clara	Medical Laboratory Assistant II	\$ 61,531	\$ 74,295	-16.8%	\$ 61,814	6/14/2021	6/13/2022	3.00%
3	County of San Mateo	Laboratory Assistant II	\$ 52,561	\$ 65,685	-17.5%	\$ 54,190	10/4/2020	unknown	unknown
4	County of Orange	Laboratory Assistant	\$ 40,186	\$ 53,539	-2.0%	\$ 52,468	7/2/2021	7/1/2022	3.50%
5	County of Alameda	Laboratory Assistant II	\$ 48,603	\$ 57,482	-11.4%	\$ 50,929	6/27/2021	6/26/2022	3.25%
6	County of Contra Costa	Laboratory Technician I	\$ 45,309	\$ 55,073	-11.1%	\$ 48,960	7/1/2021	unknown	unknown
7	County of Ventura	Laboratory Assistant	\$ 33,230	\$ 46,363	-0.7%	\$ 46,038	12/26/2020	12/27/2021	2.00%
8	County of Los Angeles	Laboratory Assistant	\$ 34,200	\$ 45,908	-3.8%	\$ 44,163	1/1/2021	unknown	unknown
9	County of San Diego	Laboratory Assistant	\$ 35,610	\$ 43,784		\$ 43,784	6/18/2021	unknown	unknown
10	County of San Bernardino	Laboratory Assistant	\$ 30,597	\$ 42,598	1.9%	\$ 43,408	7/31/2021	7/30/2022	3.00%
11	County of Fresno	Public Health Laboratory Assistant II	\$ 28,626	\$ 36,608	4.7%	\$ 38,329	11/2/2020	unknown	unknown
12	County of Kern	Laboratory Assistant	\$ 29,304	\$ 35,784	1.2%	\$ 36,213	4/21/2021	unknown	unknown
13	County of Riverside	N/C							
14	County of Sacramento	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 53,539	\$ 48,960
% County of San Diego Above/Below	-22.3%	-11.8%
Number of Matches	11	11

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Land Surveyor									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Riverside	Senior Land Surveyor	\$ 88,152	\$ 130,596	1.9%	\$ 133,077	5/1/2021	5/1/2022	2.00%
2	County of Sacramento	Associate Land Surveyor	\$ 102,500	\$ 124,591	0.1%	\$ 124,716	6/21/2020	unknown	unknown
3	County of Santa Clara	Land Surveyor	\$ 111,349	\$ 135,410	-16.8%	\$ 112,661	10/21/2020	10/20/2021	3.00%
4	County of San Bernardino	Land Surveyor	\$ 77,147	\$ 108,867	1.9%	\$ 110,936	3/13/2021	3/26/2022	3.00%
5	County of Alameda	Land Surveyor	\$ 112,840	\$ 125,091	-11.4%	\$ 110,831	10/4/2020	10/3/2021	3.25%
6	County of San Diego	Land Surveyor	\$ 89,045	\$ 109,470		\$ 109,470	6/18/2021	unknown	unknown
7	County of Orange	Surveyor II	\$ 70,325	\$ 94,765	-2.0%	\$ 92,870	7/2/2021	7/1/2022	3.50%
8	County of Kern	Engineer II	\$ 69,108	\$ 84,372	1.2%	\$ 85,384	4/21/2021	unknown	unknown
9	City and County of San Francisco	N/C							
10	County of Contra Costa	N/C							
11	County of Fresno	N/C							
12	County of Los Angeles	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 124,591	\$ 110,936
% County of San Diego Above/Below	-13.8%	-1.3%
Number of Matches	7	7

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Land Use Aide									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Contra Costa	Planning Technician I	\$ 46,860	\$ 56,958	-11.1%	\$ 50,636	7/1/2021	unknown	unknown
2	County of San Diego	Land Use Aide	\$ 39,416	\$ 48,485		\$ 48,485	6/18/2021	unknown	unknown
3	County of Sacramento	Engineering Aide	\$ 37,981	\$ 46,145	0.1%	\$ 46,191	6/21/2020	unknown	unknown
4	County of San Bernardino	Land Use Technician Trainee	\$ 32,490	\$ 43,576	1.9%	\$ 44,404	7/31/2021	7/30/2022	3.00%
5	City and County of San Francisco	N/C							
6	County of Alameda	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Los Angeles	N/C							
10	County of Orange	N/C							
11	County of Riverside	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results		
	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 46,145	\$ 46,191
% County of San Diego Above/Below	4.8%	4.7%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Land Use Technician I									
1	County of Alameda	Public Works Technical Assistant I	\$ 66,296	\$ 78,881	-11.4%	\$ 69,889	6/27/2021	6/26/2022	3.25%
2	County of Riverside	Land Use Technician I	\$ 43,137	\$ 67,399	1.9%	\$ 68,679	5/1/2021	5/1/2022	2.00%
3	County of Ventura ²	[Resource Management Agency Technician I - Planning/ Resource Management Agency Technician I - Building and Safety]	\$ 45,498	\$ 63,525	-0.7%	\$ 63,080	12/26/2020	12/27/2021	2.00%
4	County of Orange	Permit Technician Trainee	\$ 44,366	\$ 59,738	-2.0%	\$ 58,543	7/2/2021	7/1/2022	3.50%
5	County of Sacramento	Engineering Technician I	\$ 46,437	\$ 56,460	0.1%	\$ 56,516	6/21/2020	unknown	unknown
7	County of Contra Costa ¹	[Planning Technician I/Planning Technician II]	\$ 50,397	\$ 61,258	-11.1%	\$ 54,458	7/1/2021	unknown	unknown
8	County of Kern	Planning Technician	\$ 41,352	\$ 50,472	1.2%	\$ 51,078	4/21/2021	unknown	unknown
9	City and County of San Francisco	N/C							
10	County of Fresno	N/C							
11	County of Los Angeles	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 61,258	\$ 58,543
% County of San Diego Above/Below	-9.4%	-4.5%
Number of Matches	7	7

N/C - Non Comparator

1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

2 - County of Ventura: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Land Use Technician II									
1	County of Riverside	Land Use Technician II	\$ 50,574	\$ 78,984	1.9%	\$ 80,485	5/1/2021	5/1/2022	2.00%
2	County of Alameda	Public Works Technical Assistant II	\$ 75,574	\$ 90,027	-11.4%	\$ 79,764	6/27/2021	6/26/2022	3.25%
3	County of Orange	Permit Technician	\$ 56,597	\$ 76,274	-2.0%	\$ 74,748	7/2/2021	7/1/2022	3.50%
5	County of Ventura ²	[Resource Management Agency Technician II - Planning/ Resource Management Agency Technician II - Building and Safety]	\$ 48,757	\$ 68,065	-0.7%	\$ 67,589	12/26/2020	12/27/2021	2.00%
6	County of San Bernardino	Land Use Technician	\$ 48,090	\$ 66,123	1.9%	\$ 67,380	7/31/2021	7/30/2022	3.00%
7	County of Sacramento	Engineering Technician II	\$ 54,037	\$ 65,688	0.1%	\$ 65,754	6/21/2020	unknown	unknown
8	County of San Mateo ¹	[Planning Technician/Office Specialist]	\$ 61,848	\$ 77,302	-17.5%	\$ 63,774	10/4/2020	unknown	unknown
9	County of Contra Costa	Planning Technician II	\$ 53,934	\$ 65,557	-11.1%	\$ 58,280	7/1/2021	unknown	unknown
10	City and County of San Francisco	N/C							
11	County of Fresno	N/C							
12	County of Kern	N/C							
13	County of Los Angeles	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 72,170	\$ 67,484
% County of San Diego Above/Below	2.7%	9.0%
Number of Matches	8	8

N/C - Non Comparator

1 - County of San Mateo: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

2 - County of Ventura: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Land Use Technician III									
1	County of Riverside	Supervising Land Use Technician	\$ 56,626	\$ 90,740	1.9%	\$ 92,464	5/1/2021	5/1/2022	2.00%
2	County of Alameda	Public Works Technical Assistant III	\$ 82,446	\$ 98,575	-11.4%	\$ 87,337	6/27/2021	6/26/2022	3.25%
3	County of Orange	Senior Permit Technician	\$ 64,813	\$ 87,381	-2.0%	\$ 85,633	7/2/2021	7/1/2022	3.50%
4	County of Ventura	Resource Management Agency Technician III	\$ 60,625	\$ 85,059	-0.7%	\$ 84,463	12/26/2020	12/27/2021	2.00%
6	County of Sacramento	Senior Engineering Technician	\$ 61,053	\$ 74,208	0.1%	\$ 74,282	6/21/2020	unknown	unknown
7	County of San Bernardino	Senior Land Use Technician	\$ 50,440	\$ 69,389	1.9%	\$ 70,707	7/31/2021	7/30/2022	3.00%
8	City and County of San Francisco	N/C							
9	County of Contra Costa	N/C							
10	County of Fresno	N/C							
11	County of Kern	N/C							
12	County of Los Angeles	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 86,220	\$ 85,048
% County of San Diego Above/Below	-5.3%	-3.9%
Number of Matches	6	6

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Land Use/Environmental Planner I									
1	County of Los Angeles	Regional Planner	\$ 75,672	\$ 96,588	-3.8%	\$ 92,918	1/1/2021	unknown	unknown
2	County of Sacramento	Assistant Planner	\$ 69,322	\$ 84,251	0.1%	\$ 84,335	6/21/2020	unknown	unknown
3	County of Ventura	Planner II	\$ 59,810	\$ 83,638	-0.7%	\$ 83,052	12/26/2020	12/27/2021	2.00%
4	County of San Bernardino	Planner I	\$ 58,427	\$ 80,309	1.9%	\$ 81,835	7/31/2021	7/30/2022	3.00%
5	County of Orange	Assistant Planner	\$ 61,402	\$ 82,763	-2.0%	\$ 81,108	7/2/2021	7/1/2022	3.50%
7	County of San Mateo ²	[Planner I/Planner II]	\$ 74,265	\$ 92,849	-17.5%	\$ 76,601	10/4/2020	unknown	unknown
8	County of Contra Costa ¹	[Planner I/Environmental Analyst I]	\$ 63,632	\$ 77,345	-11.1%	\$ 68,760	7/1/2021	unknown	unknown
9	County of Riverside	Environmental Planner I	\$ 42,690	\$ 63,177	1.9%	\$ 64,377	5/1/2021	5/1/2022	2.00%
10	County of Kern	Planner I	\$ 50,988	\$ 62,244	1.2%	\$ 62,991	4/21/2021	unknown	unknown
11	City and County of San Francisco	N/C							
12	County of Alameda	N/C							
13	County of Fresno	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 82,763	\$ 81,108
% County of San Diego Above/Below	-3.9%	-1.9%
Number of Matches	9	9

N/C - Non Comparator

1 - County of Contra Costa: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

2 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Land Use/Environmental Planner II									
1	City and County of San Francisco	Planner III-Environmental Review	\$ 108,840	\$ 132,288	-17.4%	\$ 109,270	7/1/2021	1/8/2022	.50%
2	County of Sacramento	Associate Planner	\$ 85,504	\$ 103,941	0.1%	\$ 104,045	6/21/2020	unknown	unknown
3	County of Orange	Associate Planner	\$ 76,274	\$ 102,814	-2.0%	\$ 100,758	7/2/2021	7/1/2022	3.50%
4	County of Ventura	Planner III	\$ 71,888	\$ 101,019	-0.7%	\$ 100,312	12/26/2020	12/27/2021	2.00%
5	County of Los Angeles	Senior Regional Planner	\$ 79,884	\$ 101,964	-3.8%	\$ 98,089	1/1/2021	unknown	unknown
6	County of Alameda ¹	[Planner II/ Assistant Environmental Compliance Specialist]	\$ 91,936	\$ 106,517	-11.4%	\$ 94,374	2/7/2021	2/6/2022	3.50%
8	County of Riverside	Environmental Planner III	\$ 59,221	\$ 87,698	1.9%	\$ 89,364	5/1/2021	5/1/2022	2.00%
9	County of San Bernardino	Planner II	\$ 62,837	\$ 86,382	1.9%	\$ 88,024	7/31/2021	7/30/2022	3.00%
10	County of San Mateo	Planner II	\$ 80,578	\$ 100,712	-17.5%	\$ 83,087	10/4/2020	unknown	unknown
11	County of Contra Costa ²	[Planner II/Environmental Analyst II]	\$ 75,297	\$ 91,524	-11.1%	\$ 81,365	7/1/2021	unknown	unknown
12	County of Fresno	Planner II	\$ 54,080	\$ 69,186	4.7%	\$ 72,438	11/2/2020	unknown	unknown
13	County of Kern	Planner II	\$ 53,592	\$ 65,424	1.2%	\$ 66,209	4/21/2021	unknown	unknown
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 100,865	\$ 91,869
% County of San Diego Above/Below	-7.5%	2.1%
Number of Matches	12	12

N/C - Non Comparator

1 - County of Alameda: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

2 - County of Contra Costa: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Land Use/Environmental Planner III									
1	County of Los Angeles	Supervising Regional Planner	\$ 104,772	\$ 133,740	-3.8%	\$ 128,658	1/1/2021	unknown	unknown
2	County of Sacramento	Senior Planner	\$ 108,472	\$ 119,601	0.1%	\$ 119,721	6/21/2020	unknown	unknown
3	County of Ventura	Planner IV	\$ 80,303	\$ 118,514	-0.7%	\$ 117,684	12/26/2020	12/27/2021	2.00%
4	County of Riverside	Senior Environmental Planner	\$ 75,645	\$ 111,998	1.9%	\$ 114,126	5/1/2021	5/1/2022	2.00%
5	County of Orange	Senior Planner	\$ 85,030	\$ 114,587	-2.0%	\$ 112,295	7/2/2021	7/1/2022	3.50%
6	County of Alameda ¹	[Planner III/ Associate Environmental Compliance Specialist]	\$ 101,566	\$ 123,427	-11.4%	\$ 109,357	2/7/2021	2/6/2022	3.50%
8	County of San Bernardino	Planner III	\$ 72,758	\$ 100,131	1.9%	\$ 102,034	7/31/2021	7/30/2022	3.00%
9	County of San Mateo	Planner III	\$ 92,267	\$ 115,292	-17.5%	\$ 95,116	10/4/2020	unknown	unknown
10	County of Contra Costa ²	[Planner III/Environmental Analyst III]	\$ 87,094	\$ 105,863	-11.1%	\$ 94,112	7/1/2021	unknown	unknown
11	County of Fresno	Planner III	\$ 62,452	\$ 79,872	4.7%	\$ 83,626	11/2/2020	unknown	unknown
12	County of Kern	Planner III	\$ 63,492	\$ 77,508	1.2%	\$ 78,438	4/21/2021	unknown	unknown
13	City and County of San Francisco	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 114,587	\$ 109,357
% County of San Diego Above/Below	-6.5%	-1.6%
Number of Matches	11	11

N/C - Non Comparator

1 - County of Alameda: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

2 - County of Contra Costa: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Landscape Architect									
1	County of Sacramento	Associate Landscape Architect	\$ 102,500	\$ 124,591	0.1%	\$ 124,716	6/21/2020	unknown	unknown
2	City and County of San Francisco	Landscape Architectural Associate II	\$ 119,988	\$ 145,812	-17.4%	\$ 120,441	7/1/2021	1/8/2022	.50%
3	County of Los Angeles	Landscape Architect	\$ 87,738	\$ 111,996	-3.8%	\$ 107,740	1/1/2021	unknown	unknown
5	County of Alameda	N/C							
6	County of Contra Costa	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 124,591	\$ 120,441
% County of San Diego Above/Below	-29.2%	-24.9%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Latent Print Examiner									
1	County of Contra Costa	Fingerprint Examiner II	\$ 87,050	\$ 108,456	-11.1%	\$ 96,417	7/1/2021	7/1/2022	5.00%
3	County of Riverside	Fingerprint Examiner II	\$ 58,320	\$ 91,164	1.9%	\$ 92,896	5/1/2021	5/1/2022	2.00%
4	County of Santa Clara	Latent Fingerprint Examiner II	\$ 92,115	\$ 111,457	-16.8%	\$ 92,732	6/14/2021	6/13/2022	3.00%
5	County of San Bernardino	Latent Print Examiner	\$ 59,883	\$ 82,326	1.9%	\$ 83,891	7/31/2021	7/30/2022	3.00%
6	County of Alameda	Latent Fingerprint Examiner	\$ 69,180	\$ 82,991	-11.4%	\$ 73,530	6/27/2021	6/26/2022	3.25%
7	County of Kern	Latent Print Examiner	\$ 54,672	\$ 66,744	1.2%	\$ 67,545	4/21/2021	unknown	unknown
8	City and County of San Francisco	N/C							
9	County of Fresno	N/C							
10	County of Los Angeles	N/C							
11	County of Orange	N/C							
12	County of Sacramento	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 87,078	\$ 88,311
% County of San Diego Above/Below	8.8%	7.5%
Number of Matches	6	6

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Laundry Supervisor									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Los Angeles	Laundry Supervisor II	\$ 49,765	\$ 67,060	-3.8%	\$ 64,512	1/1/2021	unknown	unknown
2	County of San Diego	Laundry Supervisor	\$ 44,699	\$ 54,891		\$ 54,891	6/18/2021	unknown	unknown
3	County of Ventura	Supervisor - Laundry Services	\$ 40,446	\$ 54,532	-0.7%	\$ 54,150	12/26/2020	12/27/2021	2.00%
4	County of Riverside	Laundry Supervisor	\$ 32,306	\$ 47,759	1.9%	\$ 48,666	5/1/2021	5/1/2022	2.00%
5	City and County of San Francisco	N/C							
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Orange	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 54,532	\$ 54,150
% County of San Diego Above/Below	0.7%	1.3%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Laundry Worker									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Mateo	Utility Worker II	\$ 53,684	\$ 67,100	-17.5%	\$ 55,357	10/4/2020	unknown	unknown
2	County of Santa Clara	Laundry Worker II	\$ 48,687	\$ 58,608	-16.8%	\$ 48,762	6/14/2021	6/13/2022	3.00%
3	County of Alameda	Laundry Service Worker	\$ 43,428	\$ 51,422	-11.4%	\$ 45,560	6/27/2021	6/26/2022	3.25%
4	County of Sacramento	Laundry Worker	\$ 36,603	\$ 44,495	0.1%	\$ 44,540	6/21/2020	unknown	unknown
5	County of San Diego	Laundry Worker	\$ 34,528	\$ 42,432		\$ 42,432	6/18/2021	unknown	unknown
6	County of Riverside	Laundry Worker	\$ 29,120	\$ 38,664	1.9%	\$ 39,398	5/1/2021	5/1/2022	2.00%
7	County of Orange	Laundry Worker	\$ 30,306	\$ 37,690	-2.0%	\$ 36,936	7/2/2021	7/1/2022	3.50%
8	County of Ventura	Laundry Worker II	\$ 29,505	\$ 36,611	-0.7%	\$ 36,355	12/26/2020	12/27/2021	2.00%
9	County of Kern	Linen Services Associate II	\$ 29,304	\$ 35,784	1.2%	\$ 36,213	4/21/2021	unknown	unknown
10	County of Los Angeles	Laundry Worker	\$ 31,320	\$ 37,411	-3.8%	\$ 35,989	1/1/2021	unknown	unknown
11	County of San Bernardino	Linen Room Attendant	\$ 29,848	\$ 33,197	1.9%	\$ 33,828	7/31/2021	7/30/2022	3.00%
12	City and County of San Francisco	N/C							
13	County of Contra Costa	N/C							
14	County of Fresno	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 38,177	\$ 38,167
% County of San Diego Above/Below	10.0%	10.1%
Number of Matches	10	10

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Legal Support Assistant I									
1	County of Los Angeles	Legal Office Support Assistant I	\$ 44,469	\$ 64,950	-3.8%	\$ 62,481	1/1/2021	unknown	unknown
2	County of Santa Clara	Legal Clerk Trainee	\$ 59,018	\$ 71,269	-16.8%	\$ 59,296	6/14/2021	6/13/2022	3.00%
3	County of Orange	Legal Secretary Trainee	\$ 42,016	\$ 56,597	-2.0%	\$ 55,465	7/2/2021	7/1/2022	3.50%
4	County of San Mateo	Legal Office Assistant I	\$ 53,101	\$ 66,372	-17.5%	\$ 54,757	10/4/2020	unknown	unknown
5	County of Riverside	Legal Support Assistant I	\$ 33,923	\$ 52,918	1.9%	\$ 53,923	5/1/2021	5/1/2022	2.00%
6	County of Ventura	Legal Processing Assistant I	\$ 34,888	\$ 48,754	-0.7%	\$ 48,413	12/27/2020	12/26/2021	2.00%
8	County of Fresno	Legal Assistant I	\$ 29,224	\$ 36,244	4.7%	\$ 37,947	11/2/2020	unknown	unknown
9	County of Kern	Legal Process Technician I	\$ 30,348	\$ 37,056	1.2%	\$ 37,501	4/21/2021	unknown	unknown
10	City and County of San Francisco	N/C							
11	County of Alameda	N/C							
12	County of Contra Costa	N/C							
13	County of Sacramento	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 54,757	\$ 54,340
% County of San Diego Above/Below	-26.9%	-25.9%
Number of Matches	8	8

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Legal Support Assistant II									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Los Angeles	Legal Office Support Assistant II	\$ 49,521	\$ 68,565	-3.8%	\$ 65,959	1/1/2021	unknown	unknown
2	County of Orange	Legal Secretary	\$ 48,090	\$ 64,813	-2.0%	\$ 63,517	7/2/2021	7/1/2022	3.50%
3	County of Santa Clara	Legal Clerk	\$ 61,545	\$ 74,348	-16.8%	\$ 61,857	6/14/2021	6/13/2022	3.00%
4	City and County of San Francisco	Legal Process Clerk	\$ 60,300	\$ 73,272	-17.4%	\$ 60,523	7/1/2021	1/8/2022	.50%
5	County of Riverside	Legal Support Assistant II	\$ 37,868	\$ 59,128	1.9%	\$ 60,251	5/1/2021	5/1/2022	2.00%
6	County of Contra Costa	Clerk - Specialist Level	\$ 50,943	\$ 65,057	-11.1%	\$ 57,835	7/1/2021	unknown	unknown
7	County of San Mateo	Legal Office Assistant II	\$ 55,992	\$ 69,991	-17.5%	\$ 57,742	10/4/2020	unknown	unknown
8	County of Ventura	Legal Processing Assistant II	\$ 38,407	\$ 53,717	-0.7%	\$ 53,341	12/27/2020	12/26/2021	2.00%
9	County of Sacramento	Legal Secretary I	\$ 43,242	\$ 52,576	0.1%	\$ 52,629	6/21/2020	unknown	unknown
10	County of San Diego	Legal Support Assistant II	\$ 39,624	\$ 48,714		\$ 48,714	6/18/2021	unknown	unknown
11	County of Fresno	Legal Assistant II	\$ 31,590	\$ 40,404	4.7%	\$ 42,303	11/2/2020	unknown	unknown
12	County of Kern	Legal Process Technician II	\$ 33,528	\$ 40,932	1.2%	\$ 41,423	4/21/2021	unknown	unknown
13	County of Alameda	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 64,813	\$ 57,835
% County of San Diego Above/Below	-33.0%	-18.7%
Number of Matches	11	11

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Legal Support Assistant III									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Los Angeles	Senior Legal Office Support Assistant	\$ 49,521	\$ 72,392	-3.8%	\$ 69,641	1/1/2021	unknown	unknown
2	County of Orange	Senior Legal Secretary	\$ 52,166	\$ 70,325	-2.0%	\$ 68,918	7/2/2021	7/1/2022	3.50%
3	County of Riverside	Senior Legal Support Assistant	\$ 42,068	\$ 65,723	1.9%	\$ 66,972	5/1/2021	5/1/2022	2.00%
4	City and County of San Francisco	Senior Legal Process Clerk	\$ 66,144	\$ 80,388	-17.4%	\$ 66,400	7/1/2021	1/8/2022	.50%
5	County of San Mateo	Lead Legal Office Assistant	\$ 64,084	\$ 80,079	-17.5%	\$ 66,065	10/4/2020	unknown	unknown
6	County of Contra Costa	Senior Legal Coordinator	\$ 58,171	\$ 74,287	-11.1%	\$ 66,041	7/1/2021	unknown	unknown
7	County of Ventura	Legal Processing Assistant III	\$ 42,295	\$ 59,178	-0.7%	\$ 58,764	12/27/2020	12/26/2021	2.00%
8	County of Sacramento	Legal Secretary II	\$ 45,727	\$ 55,583	0.1%	\$ 55,639	6/21/2020	unknown	unknown
9	County of San Diego	Legal Support Assistant III	\$ 44,803	\$ 55,037		\$ 55,037	6/18/2021	unknown	unknown
10	County of Fresno	Senior Legal Assistant	\$ 38,896	\$ 49,764	4.7%	\$ 52,103	11/2/2020	unknown	unknown
11	County of Kern	Senior Legal Process Technician	\$ 36,684	\$ 44,784	1.2%	\$ 45,321	4/21/2021	unknown	unknown
12	County of Alameda	N/C							
13	County of San Bernardino	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 68,024	\$ 66,053
% County of San Diego Above/Below	-23.6%	-20.0%
Number of Matches	10	10

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Legal Support Supervisor I									
1	County of San Mateo	Legal Office Services Supervisor	\$ 76,251	\$ 95,262	-17.5%	\$ 78,591	10/4/2020	unknown	unknown
2	County of Alameda	Supervising Clerk I	\$ 67,454	\$ 81,827	-11.4%	\$ 72,499	12/27/2020	12/26/2021	3.00%
3	County of Sacramento	Supervising Legal Secretary	\$ 56,376	\$ 68,528	0.1%	\$ 68,597	6/21/2020	unknown	unknown
5	County of Fresno	Supervising Legal Assistant	\$ 42,822	\$ 54,756	4.7%	\$ 57,330	11/2/2020	unknown	unknown
6	County of Kern	Supervising Legal Process Technician	\$ 42,600	\$ 52,008	1.2%	\$ 52,632	4/21/2021	unknown	unknown
7	City and County of San Francisco	N/C							
8	County of Contra Costa	N/C							
9	County of Los Angeles	N/C							
10	County of Orange	N/C							
11	County of Riverside	N/C							
12	County of San Bernardino	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 68,528	\$ 68,597
% County of San Diego Above/Below	-5.2%	-5.3%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Legal Support Supervisor II									
1	County of Santa Clara	Legal Support Supervisor	\$ 92,398	\$ 112,320	-16.8%	\$ 93,450	6/28/2021	6/27/2022	3.00%
2	County of Alameda	Supervising Clerk II	\$ 70,845	\$ 85,987	-11.4%	\$ 76,185	12/27/2020	12/26/2021	3.00%
3	County of Los Angeles	Supervising Legal Office Support Assistant	\$ 55,194	\$ 76,427	-3.8%	\$ 73,523	1/1/2021	unknown	unknown
5	County of Sacramento	Supervising Legal Secretary	\$ 56,376	\$ 68,528	0.1%	\$ 68,597	6/21/2020	unknown	unknown
6	County of Fresno	Chief Legal Assistant	\$ 48,828	\$ 59,384	4.7%	\$ 62,175	4/19/2021	unknown	unknown
7	City and County of San Francisco	N/C							
8	County of Contra Costa	N/C							
9	County of Kern	N/C							
10	County of Orange	N/C							
11	County of Riverside	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 76,427	\$ 73,523
% County of San Diego Above/Below	-10.3%	-6.1%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Librarian I									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Librarian I	\$ 86,736	\$ 105,432	-17.4%	\$ 87,087	7/1/2021	1/8/2022	.50%
2	County of Orange	Librarian I	\$ 64,813	\$ 87,381	-2.0%	\$ 85,633	7/2/2021	7/1/2022	3.50%
3	County of Los Angeles	Librarian I	\$ 62,904	\$ 84,757	-3.8%	\$ 81,536	1/1/2021	unknown	unknown
4	County of Santa Clara	Librarian I	\$ 73,950	\$ 89,463	-16.8%	\$ 74,433	6/14/2021	6/13/2022	3.00%
5	County of San Mateo	Librarian I	\$ 70,303	\$ 87,878	-17.5%	\$ 72,500	10/4/2020	unknown	unknown
6	County of San Diego	Librarian I	\$ 58,032	\$ 71,365		\$ 71,365	6/18/2021	unknown	unknown
7	County of San Bernardino	Librarian I	\$ 47,362	\$ 66,747	1.9%	\$ 68,015	3/13/2021	3/26/2022	3.00%
8	County of Alameda	Librarian I	\$ 66,522	\$ 76,146	-11.4%	\$ 67,465	6/27/2021	6/26/2022	3.25%
9	County of Fresno	Librarian I	\$ 47,242	\$ 60,398	4.7%	\$ 63,237	11/2/2020	unknown	unknown
10	County of Contra Costa ¹	[Librarian Trainee/Librarian]	\$ 59,627	\$ 68,100	-11.1%	\$ 60,541	7/1/2021	unknown	unknown
11	County of Kern	Librarian I	\$ 45,012	\$ 54,948	1.2%	\$ 55,607	4/21/2021	unknown	unknown
12	County of Riverside	N/C							
13	County of Sacramento	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 80,451	\$ 70,258
% County of San Diego Above/Below	-12.7%	1.6%
Number of Matches	10	10

N/C - Non Comparator

1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Librarian II									
1	City and County of San Francisco	Librarian II	\$ 95,988	\$ 116,688	-17.4%	\$ 96,384	7/1/2021	1/8/2022	.50%
2	County of Orange	Librarian II	\$ 72,280	\$ 97,365	-2.0%	\$ 95,417	7/2/2021	7/1/2022	3.50%
3	County of Ventura ¹	[Librarian/ Librarian Specialist]	\$ 62,272	\$ 87,160	-0.7%	\$ 86,550	12/27/2020	12/26/2021	2.00%
4	County of Los Angeles	Librarian II	\$ 66,402	\$ 89,485	-3.8%	\$ 86,085	1/1/2021	unknown	unknown
5	County of San Mateo	Librarian II	\$ 76,667	\$ 95,803	-17.5%	\$ 79,037	10/4/2020	unknown	unknown
7	County of Santa Clara	Librarian II	\$ 77,894	\$ 94,295	-16.8%	\$ 78,453	6/14/2021	6/13/2022	3.00%
8	County of San Bernardino	Librarian II	\$ 53,498	\$ 75,296	1.9%	\$ 76,727	3/13/2021	3/26/2022	3.00%
9	County of Alameda	Librarian II	\$ 70,690	\$ 81,401	-11.4%	\$ 72,121	6/27/2021	6/26/2022	3.25%
10	County of Fresno	Librarian II	\$ 52,052	\$ 66,638	4.7%	\$ 69,770	11/2/2020	unknown	unknown
11	County of Contra Costa	Librarian	\$ 61,173	\$ 78,120	-11.1%	\$ 69,449	7/1/2021	unknown	unknown
12	County of Kern	Librarian II	\$ 47,304	\$ 57,756	1.2%	\$ 58,449	4/21/2021	unknown	unknown
13	County of Riverside	N/C							
14	County of Sacramento	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 87,160	\$ 78,453
% County of San Diego Above/Below	-10.5%	0.5%
Number of Matches	11	11

N/C - Non Comparator

1 - County of Ventura: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Librarian III									
1	City and County of San Francisco	Librarian III	\$ 105,876	\$ 128,676	-17.4%	\$ 106,286	7/1/2021	1/8/2022	.50%
2	County of Santa Clara	Supervising Librarian	\$ 99,721	\$ 121,299	-16.8%	\$ 100,921	6/28/2021	6/27/2022	3.00%
3	County of Orange	Librarian III	\$ 76,274	\$ 102,814	-2.0%	\$ 100,758	7/2/2021	7/1/2022	3.50%
4	County of Alameda	Library Manager I	\$ 92,477	\$ 112,507	-11.4%	\$ 99,681	12/27/2020	12/26/2021	3.00%
5	County of Ventura	City Librarian	\$ 66,703	\$ 93,359	-0.7%	\$ 92,705	12/27/2020	12/26/2021	2.00%
6	County of Los Angeles	Librarian III	\$ 70,105	\$ 94,477	-3.8%	\$ 90,887	1/1/2021	unknown	unknown
8	County of Contra Costa ¹	[Librarian Specialist/Community Library Manager]	\$ 75,550	\$ 96,481	-11.1%	\$ 85,772	7/1/2021	unknown	unknown
9	County of San Mateo	Senior Librarian	\$ 82,013	\$ 102,521	-17.5%	\$ 84,580	10/4/2020	unknown	unknown
10	County of Fresno	Librarian III	\$ 59,228	\$ 75,764	4.7%	\$ 79,325	11/2/2020	unknown	unknown
11	County of Kern	Librarian III	\$ 50,232	\$ 61,320	1.2%	\$ 62,056	4/21/2021	unknown	unknown
12	County of Riverside	N/C							
13	County of Sacramento	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 99,501	\$ 91,796
% County of San Diego Above/Below	-14.6%	-5.7%
Number of Matches	10	10

N/C - Non Comparator

1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Librarian Substitute									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Diego	Librarian Substitute	\$ 57,366	\$ 70,574		\$ 70,574	6/18/2021	unknown	unknown
2	County of Alameda	Librarian I (Services as Needed)	\$ 67,236	\$ 67,236	-11.4%	\$ 59,571	6/27/2021	6/26/2022	3.25%
3	City and County of San Francisco	N/C							
4	County of Contra Costa	N/C							
5	County of Fresno	N/C							
6	County of Kern	N/C							
7	County of Los Angeles	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 67,236	\$ 59,571
% County of San Diego Above/Below	4.7%	15.6%
Number of Matches	1	1

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Library Associate									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Contra Costa	Senior Library Literacy Assistant	\$ 61,173	\$ 78,120	-11.1%	\$ 69,449	7/1/2021	unknown	Unknown
2	County of San Diego	Library Associate	\$ 56,368	\$ 68,307		\$ 68,307	6/18/2021	unknown	unknown
3	County of Alameda	Literacy Specialist	\$ 64,368	\$ 76,488	-11.4%	\$ 67,768	6/27/2021	6/26/2022	3.25%
4	City and County of San Francisco	N/C							
5	County of Fresno	N/C							
6	County of Kern	N/C							
7	County of Los Angeles	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 77,304	\$ 68,609
% County of San Diego Above/Below	-13.2%	-0.4%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Library Technician I									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Library Assistant	\$ 63,336	\$ 76,884	-17.4%	\$ 63,506	7/1/2021	1/8/2022	.50%
2	County of Ventura	Library Technician I	\$ 37,552	\$ 52,477	-0.7%	\$ 52,110	12/27/2020	12/26/2021	2.00%
3	County of San Mateo ¹	Library Assistant I	\$ 53,829	\$ 60,152	-17.5%	\$ 49,626	10/4/2020	unknown	unknown
4	County of Orange	Library Assistant I	\$ 34,736	\$ 46,862	-2.0%	\$ 45,925	7/2/2021	7/1/2022	3.50%
5	County of Alameda	Library Clerk I	\$ 44,576	\$ 50,697	-11.4%	\$ 44,917	6/27/2021	6/26/2022	3.25%
6	County of San Bernardino	Library Assistant	\$ 30,597	\$ 42,598	1.9%	\$ 43,408	7/31/2021	7/30/2022	3.00%
7	County of San Diego	Library Technician I	\$ 31,200	\$ 38,334		\$ 38,334	6/18/2021	unknown	unknown
8	County of Fresno	Library Assistant I	\$ 29,718	\$ 35,750	4.7%	\$ 37,430	11/2/2020	unknown	unknown
9	County of Contra Costa	N/C							
10	County of Kern	N/C							
11	County of Los Angeles	N/C							
12	County of Riverside	N/C							
13	County of Sacramento	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 50,697	\$ 45,925
% County of San Diego Above/Below	-32.2%	-19.8%
Number of Matches	7	7

N/C - Non Comparator

1 - County of San Mateo: Bottom of range is step 3.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Library Technician II									
1	City and County of San Francisco	Library Technical Assistant II	\$ 80,988	\$ 98,436	-17.4%	\$ 81,308	7/1/2021	1/8/2022	.50%
2	County of Los Angeles	Library Assistant I	\$ 44,138	\$ 59,428	-3.8%	\$ 57,170	1/1/2021	unknown	unknown
3	County of Ventura ¹	[Library Technician I/ Library Technician II]	\$ 38,904	\$ 54,387	-0.7%	\$ 54,006	12/27/2020	12/26/2021	2.00%
4	County of Alameda	Library Lead Clerk	\$ 50,958	\$ 60,240	-11.4%	\$ 53,373	6/27/2021	6/26/2022	3.25%
5	County of Orange	Library Assistant II	\$ 37,690	\$ 50,794	-2.0%	\$ 49,778	7/2/2021	7/1/2022	3.50%
7	County of Santa Clara	Library Technician	\$ 45,500	\$ 54,704	-16.8%	\$ 45,514	6/14/2021	6/13/2022	3.00%
8	County of Fresno	Library Assistant II	\$ 30,966	\$ 39,598	4.7%	\$ 41,459	11/2/2020	unknown	unknown
9	County of Contra Costa	N/C							
10	County of Kern	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 54,704	\$ 53,373
% County of San Diego Above/Below	-15.6%	-12.7%
Number of Matches	7	7

N/C - Non Comparator

1 - County of Ventura: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Library Technician III									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Library Technical Assistant II	\$ 80,988	\$ 98,436	-17.4%	\$ 81,308	7/1/2021	1/8/2022	.50%
2	County of San Bernardino	Library Associate	\$ 42,931	\$ 60,507	1.9%	\$ 61,657	3/13/2021	3/26/2022	3.00%
3	County of Ventura	Library Technician III	\$ 43,962	\$ 61,545	-0.7%	\$ 61,115	12/27/2020	12/26/2021	2.00%
4	County of Los Angeles	Library Assistant II	\$ 46,579	\$ 62,748	-3.8%	\$ 60,364	1/1/2021	unknown	unknown
5	County of San Diego	Library Technician III	\$ 44,491	\$ 54,642		\$ 54,642	6/18/2021	unknown	unknown
6	County of Fresno	Senior Library Assistant	\$ 33,540	\$ 42,926	4.7%	\$ 44,944	11/2/2020	unknown	unknown
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Kern	N/C							
10	County of Orange	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 61,545	\$ 61,115
% County of San Diego Above/Below	-12.6%	-11.8%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Library Technician IV									
1	County of Alameda ¹	[Library Assistant I/ Library Assistant Manager]	\$ 68,399	\$ 82,248	-11.4%	\$ 72,872	12/27/2020	12/26/2021	3.00%
2	County of Los Angeles	Library Assistant III	\$ 49,154	\$ 66,237	-3.8%	\$ 63,720	1/1/2021	unknown	unknown
4	County of Fresno	Supervising Library Assistant	\$ 36,998	\$ 47,294	4.7%	\$ 49,517	11/2/2020	unknown	unknown
5	City and County of San Francisco	N/C							
6	County of Contra Costa	N/C							
7	County of Kern	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 66,237	\$ 63,720
% County of San Diego Above/Below	-4.2%	-0.3%
Number of Matches	3	3

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Library Technician Substitute									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Alameda	Library Clerk II (Services as Needed)	\$ 50,486	\$ 50,486	-11.4%	\$ 44,730	6/27/2021	6/26/2022	3.25%
2	County of San Diego	Library Technician Substitute	\$ 32,198	\$ 32,198		\$ 32,198	6/18/2021	unknown	unknown
3	City and County of San Francisco	N/C							
4	County of Contra Costa	N/C							
5	County of Fresno	N/C							
6	County of Kern	N/C							
7	County of Los Angeles	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 50,486	\$ 44,730
% County of San Diego Above/Below	-56.8%	-38.9%
Number of Matches	1	1

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Licensed Mental Health Clinician									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Orange	Clinical Psychologist I	\$ 76,274	\$ 102,814	-2.0%	\$ 100,758	7/2/2021	7/1/2022	3.50%
2	County of San Mateo	Marriage and Family Therapist II	\$ 92,350	\$ 115,459	-17.5%	\$ 95,253	10/4/2020	unknown	unknown
3	County of Los Angeles	Mental Health Clinician II	\$ 98,758	\$ 98,758	-3.8%	\$ 95,005	1/1/2021	unknown	unknown
4	County of San Diego	Licensed Mental Health Clinician	\$ 77,043	\$ 94,702		\$ 94,702	6/18/2021	unknown	unknown
5	County of San Bernardino	Clinical Therapist I/Clinical Therapist II	\$ 64,241	\$ 90,574	1.9%	\$ 92,295	3/13/2021	3/26/2022	3.00%
6	County of Kern	Behavioral Health Therapist II	\$ 74,484	\$ 90,924	1.2%	\$ 92,015	4/21/2021	unknown	unknown
7	County of Alameda	Behavioral Health Clinician II	\$ 88,729	\$ 102,259	-11.4%	\$ 90,602	6/27/2021	6/26/2022	3.25%
8	County of Fresno	Licensed Mental Health Clinician	\$ 70,538	\$ 84,838	4.7%	\$ 88,825	11/2/2020	unknown	unknown
9	County of Sacramento	Senior Mental Health Counselor	\$ 80,075	\$ 88,281	0.1%	\$ 88,369	6/21/2020	unknown	unknown
10	County of Riverside	Clinical Therapist II	\$ 58,002	\$ 85,858	1.9%	\$ 87,490	5/1/2021	5/1/2022	2.00%
11	County of Contra Costa	Mental Health Clinical Specialist	\$ 65,947	\$ 97,899	-11.1%	\$ 87,032	7/1/2021	unknown	unknown
12	County of Ventura	Behavioral Health Clinician III	\$ 58,896	\$ 82,499	-0.7%	\$ 81,921	12/27/2020	12/26/2021	2.00%
13	City and County of San Francisco	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 90,924	\$ 90,602
% County of San Diego Above/Below	4.0%	4.3%
Number of Matches	11	11

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Licensed Vocational Nurse									
1	City and County of San Francisco	Licensed Vocational Nurse	\$ 77,508	\$ 94,224	-17.4%	\$ 77,829	7/1/2021	1/8/2022	.50%
2	County of Santa Clara	Licensed Vocational Nurse	\$ 72,444	\$ 87,501	-16.8%	\$ 72,801	6/14/2021	6/13/2022	3.00%
3	County of San Mateo ¹	Licensed Vocational Nurse	\$ 71,114	\$ 84,093	-17.5%	\$ 69,377	10/4/2020	unknown	unknown
4	County of Contra Costa	Licensed Vocational Nurse	\$ 57,999	\$ 74,067	-11.1%	\$ 65,845	7/1/2021	unknown	unknown
5	County of Sacramento	Licensed Vocational Nurse	\$ 50,718	\$ 61,638	0.1%	\$ 61,700	6/21/2020	unknown	unknown
6	County of Alameda	Licensed Vocational Nurse	\$ 63,139	\$ 69,502	-11.4%	\$ 61,578	6/27/2021	6/26/2022	3.25%
7	County of Ventura	Licensed Vocational Nurse	\$ 55,130	\$ 59,216	-0.7%	\$ 58,801	4/4/2021	4/17/2022	3.25%
8	County of Los Angeles	Licensed Vocational Nurse II	\$ 45,240	\$ 60,912	-3.8%	\$ 58,597	1/1/2021	unknown	unknown
9	County of Fresno	Licensed Vocational Nurse II	\$ 42,822	\$ 54,756	4.7%	\$ 57,330	11/2/2020	unknown	unknown
10	County of Riverside	Licensed Vocational Nurse II	\$ 37,419	\$ 55,341	1.9%	\$ 56,393	5/1/2021	5/1/2022	2.00%
11	County of Kern	Vocational Nurse II	\$ 44,340	\$ 54,132	1.2%	\$ 54,782	4/21/2021	unknown	unknown
12	County of Orange	Licensed Vocational Nurse	\$ 41,080	\$ 54,974	-2.0%	\$ 53,875	7/2/2021	7/1/2022	3.50%
13	County of San Bernardino	Licensed Vocational Nurse II	\$ 38,210	\$ 52,458	1.9%	\$ 53,454	7/31/2021	7/30/2022	3.00%

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 60,912	\$ 58,801
% County of San Diego Above/Below	-15.8%	-11.8%
Number of Matches	13	13

N/C - Non Comparator

1 - County of San Mateo: Bottom of range is step 2.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Litigation Investigator									
1	County of Santa Clara	County Counsel Investigator	\$ 113,736	\$ 138,389	-16.8%	\$ 115,139	6/28/2021	6/27/2022	3.00%
2	County of Los Angeles	Investigator II	\$ 86,869	\$ 117,064	-3.8%	\$ 112,616	1/1/2021	unknown	unknown
3	City and County of San Francisco	Claims Investigator, City Attorneys Office	\$ 107,724	\$ 130,884	-17.4%	\$ 108,110	7/1/2021	1/8/2022	.50%
5	County of Orange	Senior Claims Representative	\$ 69,597	\$ 93,766	-2.0%	\$ 91,891	7/2/2021	7/1/2022	3.50%
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 123,974	\$ 110,363
% County of San Diego Above/Below	-27.3%	-13.3%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Mail Carrier									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Mateo	Mail Services Driver	\$ 49,066	\$ 61,338	-17.5%	\$ 50,604	10/4/2020	unknown	unknown
2	County of Santa Clara	Messenger Driver	\$ 49,731	\$ 59,860	-16.8%	\$ 49,804	6/14/2021	6/13/2022	3.00%
3	County of Contra Costa	Driver Clerk	\$ 44,907	\$ 54,584	-11.1%	\$ 48,526	7/1/2021	unknown	unknown
4	County of Alameda	Messenger	\$ 45,402	\$ 53,636	-11.4%	\$ 47,522	6/27/2021	6/26/2022	3.25%
5	County of Los Angeles	County Messenger Driver	\$ 34,788	\$ 46,693	-3.8%	\$ 44,919	1/1/2021	unknown	unknown
6	County of Ventura	Courier I	\$ 31,133	\$ 43,479	-0.7%	\$ 43,175	12/27/2020	12/26/2021	2.00%
7	County of Riverside	Messenger	\$ 29,120	\$ 41,447	1.9%	\$ 42,235	5/1/2021	5/1/2022	2.00%
8	County of San Bernardino	Mail Processor II	\$ 30,243	\$ 41,205	1.9%	\$ 41,988	7/31/2021	7/30/2022	3.00%
9	County of San Diego	Mail Carrier	\$ 33,738	\$ 41,454		\$ 41,454	6/18/2021	unknown	unknown
10	County of Kern	Mail Clerk II	\$ 29,304	\$ 35,784	1.2%	\$ 36,213	4/21/2021	unknown	unknown
11	City and County of San Francisco	N/C							
12	County of Fresno	N/C							
13	County of Orange	N/C							
14	County of Sacramento	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 46,693	\$ 44,919
% County of San Diego Above/Below	-12.6%	-8.4%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Mail Processor									
1	City and County of San Francisco	Clerk	\$ 55,488	\$ 67,416	-17.4%	\$ 55,686	7/1/2021	1/8/2022	.50%
2	County of Alameda	Mail Clerk	\$ 45,402	\$ 53,636	-11.4%	\$ 47,522	6/27/2021	6/26/2022	3.25%
3	County of Riverside	Mail Clerk	\$ 29,323	\$ 45,790	1.9%	\$ 46,660	5/1/2021	5/1/2022	2.00%
4	County of Ventura	Courier II	\$ 32,650	\$ 45,622	-0.7%	\$ 45,303	12/27/2020	12/26/2021	2.00%
6	County of Kern	Mail Clerk I	\$ 29,304	\$ 35,784	1.2%	\$ 36,213	4/21/2021	unknown	unknown
7	County of San Bernardino	Mail Processor I	\$ 29,848	\$ 33,197	1.9%	\$ 33,828	7/31/2021	7/30/2022	3.00%
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Los Angeles	N/C							
11	County of Orange	N/C							
12	County of Sacramento	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 45,706	\$ 45,981
% County of San Diego Above/Below	-15.9%	-16.6%
Number of Matches	6	6

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Mail Systems Supervisor									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Contra Costa	Print and Mail Services Supervisor	\$ 68,605	\$ 83,390	-11.1%	\$ 74,134	7/1/2021	unknown	unknown
2	County of Alameda	Supervising Messenger	\$ 60,528	\$ 71,386	-11.4%	\$ 63,248	12/27/2020	12/26/2021	3.00%
3	County of Santa Clara	Mail Room Supervisor	\$ 60,333	\$ 73,364	-16.8%	\$ 61,039	6/28/2021	6/27/2022	3.00%
4	County of San Diego	Mail Systems Supervisor	\$ 49,587	\$ 60,944		\$ 60,944	6/18/2021	unknown	unknown
5	County of Los Angeles	Supervisor, Mail and Delivery Service	\$ 44,138	\$ 59,428	-3.8%	\$ 57,170	1/1/2021	unknown	unknown
6	County of Riverside	Supervising Mail Clerk	\$ 32,491	\$ 47,981	1.9%	\$ 48,893	5/1/2021	5/1/2022	2.00%
7	City and County of San Francisco	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Orange	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 71,386	\$ 61,039
% County of San Diego Above/Below	-17.1%	-0.2%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Medical Claims Specialist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Claim Process Clerk	\$ 65,448	\$ 79,584	-17.4%	\$ 65,736	7/1/2021	1/8/2022	.50%
2	County of Orange	Claims Technician	\$ 49,358	\$ 65,936	-2.0%	\$ 64,617	7/2/2021	7/1/2022	3.50%
3	County of San Mateo	Patient Services Specialist	\$ 62,420	\$ 78,082	-17.5%	\$ 64,417	10/4/2020	unknown	unknown
4	County of Santa Clara	Valley Health Plan (VHP) Claims Examiner	\$ 61,162	\$ 73,855	-16.8%	\$ 61,447	6/14/2021	6/13/2022	3.00%
5	County of Alameda	Health Care Claims Examiner II	\$ 58,911	\$ 66,784	-11.4%	\$ 59,170	6/27/2021	6/26/2022	3.25%
6	County of Ventura	Medical Claims Processor II	\$ 35,045	\$ 52,573	-0.7%	\$ 52,205	12/27/2020	12/26/2021	2.00%
7	County of Sacramento	Claims Assistance Specialist	\$ 42,303	\$ 51,407	0.1%	\$ 51,458	6/21/2020	unknown	unknown
8	County of San Diego	Medical Claims Specialist	\$ 40,539	\$ 49,816		\$ 49,816	6/18/2021	unknown	unknown
9	County of Kern	Billing Office Specialist II	\$ 32,868	\$ 40,128	1.2%	\$ 40,610	4/21/2021	unknown	unknown
10	County of Contra Costa	N/C							
11	County of Fresno	N/C							
12	County of Los Angeles	N/C							
13	County of Riverside	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 66,360	\$ 60,309
% County of San Diego Above/Below	-33.2%	-21.1%
Number of Matches	8	8

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Medical Consultant									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Los Angeles	Physician, M.D. (Non-Megaflex)	\$ 223,649	\$ 223,649	-3.8%	\$ 215,150	1/1/2021	unknown	unknown
2	County of San Diego	Medical Consultant	\$ 174,158	\$ 194,210		\$ 194,210	6/18/2021	unknown	unknown
3	County of Riverside	Medical Consultant	\$ 150,634	\$ 150,634	1.9%	\$ 153,496	7/1/2021	7/14/2022	2.00%
4	City and County of San Francisco	N/C							
5	County of Alameda	N/C							
6	County of Contra Costa	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Orange	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results		
	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 187,141	\$ 184,323
% County of San Diego Above/Below	3.6%	5.1%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Medical Examiner Invest I									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Ventura	Medical Examiner Investigator I	\$ 65,667	\$ 90,742	-0.7%	\$ 90,107	6/28/2020	unknown	unknown
2	City and County of San Francisco	Medical Examiners Investigator I	\$ 82,812	\$ 100,644	-17.4%	\$ 83,132	7/1/2021	1/8/2022	.50%
3	County of Los Angeles	Coroner Investigator Trainee	\$ 63,996	\$ 86,231	-3.8%	\$ 82,954	1/1/2021	unknown	unknown
4	County of Riverside	Deputy Coroner I	\$ 54,143	\$ 79,596	1.9%	\$ 81,109	5/1/2021	5/1/2022	2.00%
5	County of Sacramento	Deputy Coroner I	\$ 61,345	\$ 78,300	0.1%	\$ 78,378	6/21/2020	unknown	unknown
6	County of Alameda	Coroner's Investigator I	\$ 78,044	\$ 86,613	-11.4%	\$ 76,739	6/27/2021	6/26/2022	3.25%
7	County of Fresno	Deputy Coroner I	\$ 50,830	\$ 65,000	4.7%	\$ 68,055	7/1/2019	unknown	unknown
8	County of San Diego	Medical Examiner Invest I	\$ 47,112	\$ 63,731		\$ 63,731	6/18/2021	unknown	unknown
9	County of Contra Costa	N/C							
10	County of Kern	N/C							
11	County of Orange	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results		Top Annual	Adjusted Top Annual
Median of Comparators		\$ 86,231	\$ 81,109
% County of San Diego Above/Below		-35.3%	-27.3%
Number of Matches		7	7

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Medical Examiner Invest II									
1	County of Santa Clara	Medical Examiner-Coroner Investigator	\$ 105,202	\$ 127,868	-16.8%	\$ 106,386	6/14/2021	6/13/2022	3.00%
2	City and County of San Francisco	Medical Examiners Investigator II	\$ 100,644	\$ 122,328	-17.4%	\$ 101,043	7/1/2021	1/8/2022	.50%
3	County of Ventura	Medical Examiner Investigator II	\$ 68,537	\$ 95,443	-0.7%	\$ 94,775	6/28/2020	unknown	unknown
4	County of San Mateo	Deputy Coroner	\$ 91,477	\$ 114,315	-17.5%	\$ 94,310	12/13/2020	12/12/2021	2-4%
5	County of Riverside	Deputy Coroner II	\$ 62,222	\$ 91,488	1.9%	\$ 93,227	5/1/2021	5/1/2022	2.00%
6	County of Los Angeles	Coroner Investigator	\$ 71,327	\$ 96,119	-3.8%	\$ 92,467	1/1/2021	unknown	unknown
7	County of San Bernardino	Deputy Coroner Investigator	\$ 62,546	\$ 85,987	1.9%	\$ 87,621	12/19/2020	12/18/2021	3.00%
8	County of Alameda	Coroner's Investigator II	\$ 81,630	\$ 98,382	-11.4%	\$ 87,166	6/27/2021	6/26/2022	3.25%
9	County of Sacramento	Deputy Coroner II	\$ 67,359	\$ 85,963	0.1%	\$ 86,049	6/21/2020	unknown	unknown
11	County of Fresno	Deputy Coroner II	\$ 55,900	\$ 71,474	4.7%	\$ 74,833	7/1/2019	unknown	unknown
12	County of Contra Costa	N/C							
13	County of Kern	N/C							
14	County of Orange	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 95,781	\$ 92,847
% County of San Diego Above/Below	-23.6%	-19.8%
Number of Matches	10	10

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Medical Examiner Invest III									
1	City and County of San Francisco	Medical Examiners Investigator III	\$ 110,736	\$ 134,556	-17.4%	\$ 111,143	7/1/2021	1/8/2022	.50%
2	County of Ventura	Senior Medical Examiner Investigator	\$ 82,594	\$ 110,724	-0.7%	\$ 109,949	6/28/2020	unknown	unknown
3	County of Fresno	Senior Deputy Coroner	\$ 71,316	\$ 102,432	4.7%	\$ 107,246	4/19/2021	unknown	unknown
4	County of San Mateo ¹	[Deputy Coroner/Supervising Deputy Coroner]	\$ 95,553	\$ 119,431	-17.5%	\$ 98,531	12/13/2020	12/12/2021	2-4%
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Kern	N/C							
9	County of Los Angeles	N/C							
10	County of Orange	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 115,078	\$ 108,598
% County of San Diego Above/Below	-34.0%	-26.5%
Number of Matches	4	4

N/C - Non Comparator

1 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Medical Transcriber									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Medical Transcriber Typist	\$ 67,284	\$ 81,744	-17.4%	\$ 67,521	7/1/2021	1/8/2022	.50%
2	County of San Mateo	Medical Transcriptionist	\$ 57,407	\$ 71,821	-17.5%	\$ 59,252	10/4/2020	unknown	unknown
3	County of Alameda	Medical Transcriptionist	\$ 58,629	\$ 66,597	-11.4%	\$ 59,005	6/27/2021	6/26/2022	3.25%
4	County of Santa Clara	Medical Transcriptionist	\$ 58,038	\$ 70,059	-16.8%	\$ 58,289	6/14/2021	6/13/2022	3.00%
5	County of Los Angeles	Medical Transcriber - Typist	\$ 43,609	\$ 57,133	-3.8%	\$ 54,962	1/1/2021	unknown	unknown
6	County of Riverside	Medical Transcriptionist II	\$ 34,391	\$ 53,674	1.9%	\$ 54,693	5/1/2021	5/1/2022	2.00%
7	County of Contra Costa	Medical Transcriber	\$ 47,626	\$ 60,821	-11.1%	\$ 54,070	7/1/2021	unknown	unknown
8	County of Orange	Medical Transcriber II	\$ 39,582	\$ 52,520	-2.0%	\$ 51,470	7/2/2021	7/1/2022	3.50%
9	County of San Diego	Medical Transcriber	\$ 41,330	\$ 50,814		\$ 50,814	6/18/2021	unknown	unknown
10	County of Sacramento	Medical Transcriber II	\$ 41,196	\$ 50,091	0.1%	\$ 50,141	6/21/2020	unknown	unknown
11	County of Ventura	Information Processing Operator II	\$ 33,744	\$ 47,167	-0.7%	\$ 46,837	12/27/2020	12/26/2021	2.00%
12	County of Fresno	N/C							
13	County of Kern	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 58,977	\$ 54,828
% County of San Diego Above/Below	-16.1%	-7.9%
Number of Matches	10	10

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Mental Health Aide									
1	County of Santa Clara	Mental Health Worker	\$ 50,259	\$ 60,576	-16.8%	\$ 50,399	6/14/2021	6/13/2022	3.00%
2	County of Los Angeles	Community Health Worker	\$ 34,788	\$ 52,016	-3.8%	\$ 50,039	1/1/2021	unknown	unknown
4	County of Kern	Behavioral Health Recovery Specialist Aide	\$ 34,728	\$ 42,396	1.2%	\$ 42,905	4/21/2021	unknown	unknown
5	City and County of San Francisco	N/C							
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Fresno	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 52,016	\$ 50,039
% County of San Diego Above/Below	-19.3%	-14.8%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Mental Health Case Management Assistant									
1	City and County of San Francisco	Human Services Agency Social Worker	\$ 64,380	\$ 98,928	-17.4%	\$ 81,715	7/1/2021	1/8/2022	.50%
2	County of Fresno	Community Mental Health Specialist II	\$ 41,730	\$ 53,378	4.7%	\$ 55,887	11/2/2020	unknown	unknown
3	County of Ventura	Mental Health Associate	\$ 40,146	\$ 56,218	-0.7%	\$ 55,824	12/26/2020	12/27/2021	2.00%
4	County of Kern	Behavioral Health Recovery Specialist I	\$ 44,112	\$ 53,856	1.2%	\$ 54,502	4/21/2021	unknown	unknown
5	County of Los Angeles	Medical Case Worker I	\$ 50,010	\$ 54,249	-3.8%	\$ 52,187	1/1/2021	unknown	unknown
6	County of Sacramento	Mental Health Worker	\$ 42,804	\$ 52,054	0.1%	\$ 52,106	6/21/2020	unknown	unknown
7	County of Riverside	Social Service Assistant	\$ 30,028	\$ 44,364	1.9%	\$ 45,207	5/1/2021	5/1/2022	2.00%
9	County of Orange	Mental Health Worker I	\$ 33,446	\$ 43,576	-2.0%	\$ 42,704	7/2/2021	7/1/2022	3.50%
10	County of Alameda	N/C							
11	County of Contra Costa	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 53,617	\$ 53,345
% County of San Diego Above/Below	-19.2%	-18.6%
Number of Matches	8	8

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Mental Health Case Management Clinician									
1	County of Orange	Behavioral Health Clinician II	\$ 64,813	\$ 87,381	-2.0%	\$ 85,633	7/2/2021	7/1/2022	3.50%
2	County of Santa Clara	Psychiatric Social Worker I	\$ 84,055	\$ 101,756	-16.8%	\$ 84,661	6/14/2021	6/13/2022	3.00%
3	County of Fresno	Unlicensed Mental Health Clinician	\$ 64,116	\$ 77,116	4.7%	\$ 80,740	11/2/2020	unknown	unknown
4	County of Ventura	Behavioral Health Clinician II	\$ 56,081	\$ 78,611	-0.7%	\$ 78,061	12/27/2020	12/26/2021	2.00%
5	County of San Mateo	Mental Health Counselor II	\$ 71,384	\$ 89,230	-17.5%	\$ 73,615	10/4/2020	unknown	unknown
7	County of Riverside	Social Services Practitioner II	\$ 43,379	\$ 64,160	1.9%	\$ 65,379	5/1/2021	5/1/2022	2.00%
8	City and County of San Francisco	N/C							
9	County of Alameda	N/C							
10	County of Contra Costa	N/C							
11	County of Kern	N/C							
12	County of Los Angeles	N/C							
13	County of Sacramento	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 82,996	\$ 79,401
% County of San Diego Above/Below	-14.2%	-9.3%
Number of Matches	6	6

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Mental Health Conservatorship Clinician									
1	City and County of San Francisco	Behavioral Health Clinician	\$ 95,676	\$ 116,244	-17.4%	\$ 96,018	7/1/2021	1/8/2022	.50%
2	County of Los Angeles	Psychiatric Social Worker II	\$ 77,371	\$ 98,758	-3.8%	\$ 95,005	1/1/2021	unknown	unknown
4	County of Alameda	N/C							
5	County of Contra Costa	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 107,501	\$ 95,511
% County of San Diego Above/Below	-17.8%	-4.7%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Mental Health Specialist									
1	City and County of San Francisco	Mental Health Treatment Specialist	\$ 98,436	\$ 119,604	-17.4%	\$ 98,793	7/1/2021	1/8/2022	.50%
2	County of Contra Costa	Mental Health Specialist I	\$ 52,981	\$ 71,000	-11.1%	\$ 63,119	7/1/2021	unknown	unknown
3	County of Orange	Mental Health Specialist	\$ 47,507	\$ 63,440	-2.0%	\$ 62,171	7/2/2021	7/1/2022	3.50%
4	County of San Bernardino	Mental Health Specialist	\$ 42,236	\$ 58,032	1.9%	\$ 59,135	7/31/2021	7/30/2022	3.00%
5	County of Riverside	Behavioral Health Specialist II	\$ 38,028	\$ 56,229	1.9%	\$ 57,297	5/1/2021	5/1/2022	2.00%
6	County of Kern	Behavioral Health Recovery Specialist II	\$ 46,368	\$ 56,616	1.2%	\$ 57,295	4/21/2021	unknown	unknown
7	County of Alameda	Mental Health Specialist II	\$ 56,435	\$ 64,408	-11.4%	\$ 57,065	6/27/2021	6/26/2022	3.25%
8	County of Santa Clara	Mental Health Community Worker	\$ 54,991	\$ 66,425	-16.8%	\$ 55,265	6/14/2021	6/13/2022	3.00%
9	County of Sacramento	Mental Health Worker - Discharge Planner	\$ 44,934	\$ 54,643	0.1%	\$ 54,698	6/21/2020	unknown	unknown
11	County of Fresno	N/C							
12	County of Los Angeles	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 63,440	\$ 57,297
% County of San Diego Above/Below	-20.2%	-8.6%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Multimedia Designer									
1	County of San Mateo	Senior Graphics Specialist	\$ 84,363	\$ 105,475	-17.5%	\$ 87,017	10/4/2020	unknown	unknown
2	County of Santa Clara	Multimedia Communications Specialist	\$ 85,567	\$ 104,013	-16.8%	\$ 86,538	6/14/2021	6/13/2022	3.00%
4	City and County of San Francisco	Media Production Specialist	\$ 74,928	\$ 91,104	-17.4%	\$ 75,252	7/1/2021	1/8/2022	.50%
5	County of Sacramento	Public Information Specialist	\$ 60,093	\$ 73,059	0.1%	\$ 73,132	6/21/2020	unknown	unknown
6	County of Orange	Senior Computer Graphics Specialist	\$ 53,539	\$ 71,698	-2.0%	\$ 70,264	7/2/2021	7/1/2022	3.50%
7	County of Riverside	Media Production Specialist	\$ 45,233	\$ 66,951	1.9%	\$ 68,223	5/1/2021	5/1/2022	2.00%
8	County of Alameda	Sheriff's Multimedia Producer	\$ 62,878	\$ 75,442	-11.4%	\$ 66,841	6/27/2021	6/26/2022	3.25%
9	County of Contra Costa	N/C							
10	County of Fresno	N/C							
11	County of Kern	N/C							
12	County of Los Angeles	N/C							
13	County of San Bernardino	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 75,442	\$ 73,132
% County of San Diego Above/Below	6.8%	9.6%
Number of Matches	7	7

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Nutritionist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Nutritionist	\$ 96,252	\$ 117,084	-17.4%	\$ 96,711	7/1/2021	1/8/2022	.50%
2	County of Santa Clara	Public Health Nutritionist	\$ 89,532	\$ 108,372	-16.8%	\$ 90,166	6/14/2021	6/13/2022	3.00%
3	County of San Mateo	Dietitian I	\$ 80,203	\$ 100,254	-17.5%	\$ 82,710	10/4/2020	unknown	unknown
4	County of Alameda	Nutritionist II	\$ 75,642	\$ 90,783	-11.4%	\$ 80,434	6/27/2021	6/26/2022	3.25%
5	County of Sacramento	Dietitian	\$ 64,018	\$ 77,799	0.1%	\$ 77,877	6/21/2020	unknown	unknown
6	County of Los Angeles	Nutritionist II	\$ 59,725	\$ 80,483	-3.8%	\$ 77,425	1/1/2021	unknown	unknown
7	County of Orange	Public Health Nutritionist I	\$ 57,886	\$ 77,958	-2.0%	\$ 76,399	7/2/2021	7/1/2022	3.50%
8	County of San Bernardino	Nutritionist	\$ 53,082	\$ 74,776	1.9%	\$ 76,197	3/13/2021	3/26/2022	3.00%
9	County of Riverside	Nutritionist	\$ 49,373	\$ 73,092	1.9%	\$ 74,481	5/1/2021	5/1/2022	2.00%
10	County of Ventura	Public Health Nutritionist II	\$ 52,158	\$ 74,566	-0.7%	\$ 74,044	12/27/2020	12/26/2021	2.00%
11	County of Contra Costa	Public Health Nutritionist	\$ 66,994	\$ 81,431	-11.1%	\$ 72,393	7/1/2021	unknown	unknown
12	County of Kern	Public Health Nutritionist	\$ 57,468	\$ 70,152	1.2%	\$ 70,994	4/21/2021	unknown	unknown
13	County of San Diego	Nutritionist	\$ 55,224	\$ 67,891		\$ 67,891	6/18/2021	unknown	unknown
14	County of Fresno	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 79,221	\$ 76,912
% County of San Diego Above/Below	-16.7%	-13.3%
Number of Matches	12	12

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Occupational/Physical Therapist									
1	County of Los Angeles	Occupational Therapist II/Physical Therapist II	\$ 91,043	\$ 122,688	-3.8%	\$ 118,026	1/1/2021	unknown	unknown
2	County of Santa Clara	Occupational Therapist II / Physical Therapist II	\$ 117,125	\$ 141,702	-16.8%	\$ 117,896	6/14/2021	6/13/2022	3.00%
3	City and County of San Francisco ¹	[Occupational Therapist/ Physical Therapist]	\$ 99,108	\$ 139,548	-17.4%	\$ 115,267	7/1/2021	1/8/2022	.50%
4	County of Orange ⁶	[Occupational Therapist II/ Physical Therapist II]	\$ 85,717	\$ 115,149	-2.0%	\$ 112,846	7/2/2021	7/1/2022	3.50%
5	County of Riverside ⁷	[Occupational Therapist II/ Physical Therapist II]	\$ 68,949	\$ 110,512	1.9%	\$ 112,612	5/1/2021	5/1/2022	2.00%
6	County of San Bernardino	Occupational Therapist II/Physical Therapist II	\$ 74,734	\$ 105,352	1.9%	\$ 107,354	3/13/2021	3/26/2022	3.00%
7	County of San Mateo ⁸	[Occupational Therapist II - CCS/Physical Therapist II - CCS]	\$ 96,365	\$ 120,450	-17.5%	\$ 99,372	10/4/2020	unknown	unknown
8	County of Sacramento	Therapist	\$ 84,773	\$ 98,136	0.1%	\$ 98,234	6/21/2020	unknown	unknown
9	County of Ventura ⁹	[Occupational Therapist/ Physical Therapist]	\$ 69,451	\$ 97,108	-0.7%	\$ 96,429	12/27/2020	12/26/2021	2.00%
11	County of Kern ⁵	[Occupational Therapist/ Physical Therapist]	\$ 77,508	\$ 94,632	1.2%	\$ 95,768	4/21/2021	unknown	unknown
12	County of Fresno ⁴	[Occupational Therapist II / Physical Therapist II]	\$ 69,290	\$ 88,608	4.7%	\$ 92,773	11/2/2020	unknown	unknown
13	County of Alameda ²	[Occupational Therapist I/ Physical Therapist I]	\$ 84,582	\$ 101,796	-11.4%	\$ 90,191	6/27/2021	6/26/2022	3.25%
14	County of Contra Costa ³	[Occupational Therapist I/Physical Therapist I]	\$ 83,381	\$ 101,350	-11.1%	\$ 90,100	7/1/2021	unknown	unknown

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 105,352	\$ 99,372
% County of San Diego Above/Below	-9.7%	-3.4%
Number of Matches	13	13

N/C - Non Comparator

- 1 - City and County of San Francisco: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the same for both matches.
- 2 - County of Alameda: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the same for both matches.
- 3 - County of Contra Costa: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.
- 4 - County of Fresno: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the same for both matches.
- 5 - County of Kern: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the same for both matches.
- 6 - County of Orange: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.
- 7 - County of Riverside: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the same for both matches.
- 8 - County of San Mateo: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.
- 9 - County of Ventura: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Occupational/Physical Therapist Assistant									
1	City and County of San Francisco	Physical Therapist Assistant	\$ 83,412	\$ 111,780	-17.4%	\$ 92,330	7/1/2021	1/8/2022	.50%
2	County of Fresno ³	[Occupational Therapist I / Physical Therapist I]	\$ 65,494	\$ 83,798	4.7%	\$ 87,737	11/2/2020	unknown	unknown
3	County of Santa Clara	Occupational Therapy Assistant II	\$ 81,014	\$ 97,922	-16.8%	\$ 81,471	6/14/2021	6/13/2022	3.00%
4	County of Riverside ⁶	[Occupational Therapist Assistant/ Physical Therapist Assistant]	\$ 49,498	\$ 79,331	1.9%	\$ 80,838	5/1/2021	5/1/2022	2.00%
5	County of Los Angeles	Occupational Therapist Assistant/Physical Therapist Assistant	\$ 49,643	\$ 78,719	-3.8%	\$ 75,728	1/1/2021	unknown	unknown
6	County of Orange ⁵	[Occupational Therapist Asst II/ Physical Therapist Asst II]	\$ 57,158	\$ 76,877	-2.0%	\$ 75,339	7/2/2021	7/1/2022	3.50%
7	County of Contra Costa ²	[Therapist Aide/Therapy Assistant]	\$ 67,326	\$ 81,836	-11.1%	\$ 72,752	7/1/2021	unknown	unknown
8	County of San Mateo	Therapy Assistant	\$ 68,826	\$ 86,006	-17.5%	\$ 70,955	10/4/2020	unknown	unknown
9	County of San Bernardino	Occupational Therapy Assistant/Physical Therapy Assistant	\$ 47,736	\$ 65,603	1.9%	\$ 66,850	7/31/2021	7/30/2022	3.00%
11	County of Ventura ⁷	[Certified Occupational Therapy Assistant/ Licensed Physical Therapy Assistant]	\$ 40,612	\$ 62,629	-0.7%	\$ 62,191	12/26/2020	12/27/2021	2.00%
12	County of Alameda ¹	[Occupational Therapy Assistant/ Physical Therapy Assistant]	\$ 50,681	\$ 60,158	-11.4%	\$ 53,300	6/27/2021	6/26/2022	3.25%
13	County of Kern ⁴	[Occupational Therapy Technician/ Physical Therapy Assistant]	\$ 31,116	\$ 37,992	1.2%	\$ 38,448	4/21/2021	unknown	unknown
14	County of Sacramento	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 79,025	\$ 74,046
% County of San Diego Above/Below	-25.3%	-17.4%
Number of Matches	12	12

N/C - Non Comparator

1 - County of Alameda: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the same for both matches.

2 - County of Contra Costa: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

3 - County of Fresno: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the same for both matches.

4 - County of Kern: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

5 - County of Orange: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

6 - County of Riverside: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the same for both matches.

7 - County of Ventura: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Office Assistant									
1	City and County of San Francisco	Clerk	\$ 55,488	\$ 67,416	-17.4%	\$ 55,686	7/1/2021	1/8/2022	.50%
2	County of Santa Clara	Office Specialist II - Confidential Clerical	\$ 51,166	\$ 62,221	-16.8%	\$ 51,768	6/28/2021	6/27/2022	3.00%
3	County of Alameda	Clerk II	\$ 50,697	\$ 57,039	-11.4%	\$ 50,536	6/27/2021	6/26/2022	3.25%
4	County of San Mateo	Office Assistant II	\$ 48,983	\$ 61,234	-17.5%	\$ 50,518	10/4/2020	unknown	unknown
5	County of Riverside	Office Assistant II	\$ 29,120	\$ 45,084	1.9%	\$ 45,940	5/1/2021	5/1/2022	2.00%
6	County of Ventura	Office Assistant II	\$ 32,650	\$ 45,622	-0.7%	\$ 45,303	12/27/2020	12/26/2021	2.00%
7	County of Contra Costa	Clerk - Experienced Level	\$ 40,817	\$ 50,643	-11.1%	\$ 45,022	7/1/2021	unknown	unknown
8	County of Orange	Office Assistant	\$ 35,235	\$ 45,698	-2.0%	\$ 44,784	7/2/2021	7/1/2022	3.50%
9	County of Sacramento	Office Assistant II	\$ 36,498	\$ 44,349	0.1%	\$ 44,393	6/21/2020	unknown	unknown
10	County of San Bernardino	Office Assistant II	\$ 30,597	\$ 42,598	1.9%	\$ 43,408	7/31/2021	7/30/2022	3.00%
12	County of Los Angeles	Office Support Assistant	\$ 31,320	\$ 43,086	-3.8%	\$ 41,448	1/1/2021	unknown	unknown
13	County of Fresno	Office Assistant II	\$ 29,224	\$ 36,244	4.7%	\$ 37,947	11/2/2020	unknown	unknown
14	County of Kern	Office Services Technician	\$ 29,460	\$ 35,964	1.2%	\$ 36,396	4/21/2021	unknown	unknown

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 45,622	\$ 45,022
% County of San Diego Above/Below	-9.1%	-7.6%
Number of Matches	13	13

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Office Support Specialist									
1	City and County of San Francisco	Senior Clerk	\$ 57,538	\$ 81,744	-17.4%	\$ 67,521	7/1/2021	1/8/2022	.50%
2	County of Contra Costa	Clerk - Specialist Level	\$ 50,943	\$ 65,057	-11.1%	\$ 57,835	7/1/2021	unknown	unknown
3	County of Santa Clara	Office Specialist III - U - Confidential Clerical	\$ 55,557	\$ 67,558	-16.8%	\$ 56,209	6/28/2021	6/27/2022	3.00%
4	County of San Mateo	Office Specialist	\$ 54,058	\$ 67,557	-17.5%	\$ 55,735	10/4/2020	unknown	unknown
5	County of Orange	Office Specialist	\$ 40,581	\$ 53,768	-2.0%	\$ 52,693	7/2/2021	7/1/2022	3.50%
6	County of Alameda	Specialist Clerk I	\$ 52,388	\$ 59,374	-11.4%	\$ 52,606	6/27/2021	6/26/2022	3.25%
7	County of Sacramento	Office Specialist II	\$ 42,908	\$ 52,158	0.1%	\$ 52,210	6/21/2020	unknown	unknown
8	County of San Bernardino	Office Specialist	\$ 36,754	\$ 50,482	1.9%	\$ 51,441	7/31/2021	7/30/2022	3.00%
9	County of Riverside	Office Assistant III	\$ 32,065	\$ 50,082	1.9%	\$ 51,033	5/1/2021	5/1/2022	2.00%
10	County of Ventura	Office Assistant III	\$ 35,892	\$ 50,191	-0.7%	\$ 49,840	12/27/2020	12/26/2021	2.00%
12	County of Fresno	Office Assistant III	\$ 31,590	\$ 40,404	4.7%	\$ 42,303	11/2/2020	unknown	unknown
13	County of Kern ¹	[Office Services Specialist/ Office Services Technician]	\$ 31,416	\$ 38,346	1.2%	\$ 38,806	4/21/2021	unknown	unknown
14	County of Los Angeles	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 52,963	\$ 52,408
% County of San Diego Above/Below	-9.4%	-8.2%
Number of Matches	12	12

N/C - Non Comparator

1 - County of Kern: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Paralegal I									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Paralegal - Confidential Administrative	\$ 77,994	\$ 94,378	-16.8%	\$ 78,522	6/28/2021	6/27/2022	3.00%
2	County of Los Angeles	Paralegal	\$ 56,430	\$ 80,283	-3.8%	\$ 77,233	1/1/2021	unknown	unknown
3	County of San Bernardino	Paralegal	\$ 51,771	\$ 71,032	1.9%	\$ 72,382	7/31/2021	7/30/2022	3.00%
4	County of Ventura	Paralegal	\$ 47,576	\$ 66,735	-0.7%	\$ 66,268	12/27/2020	12/26/2021	2.00%
5	County of Riverside	Paralegal I	\$ 42,690	\$ 63,177	1.9%	\$ 64,377	5/1/2021	5/1/2022	2.00%
6	County of Sacramento	Paralegal	\$ 49,841	\$ 60,573	0.1%	\$ 60,634	6/21/2020	unknown	unknown
7	County of San Diego	Paralegal I	\$ 43,576	\$ 59,010		\$ 59,010	6/18/2021	unknown	unknown
8	County of Kern	Paralegal	\$ 45,684	\$ 55,776	1.2%	\$ 56,445	4/21/2021	unknown	unknown
9	County of Contra Costa	Paralegal	\$ 51,735	\$ 62,875	-11.1%	\$ 55,896	7/1/2021	unknown	unknown
10	County of Fresno	Paralegal I	\$ 31,746	\$ 38,584	4.7%	\$ 40,397	4/19/2021	unknown	unknown
11	City and County of San Francisco	N/C							
12	County of Alameda	N/C							
13	County of Orange	N/C							
14	County of San Mateo	N/C							

Summary Results		
	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 63,177	\$ 64,377
% County of San Diego Above/Below	-7.1%	-9.1%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Paralegal II									
1	County of Santa Clara	Senior Paralegal - Confidential Administrative	\$ 85,754	\$ 103,821	-16.8%	\$ 86,379	6/28/2021	6/27/2022	3.00%
2	County of Los Angeles	Senior Paralegal	\$ 59,577	\$ 89,485	-3.8%	\$ 86,085	1/1/2021	unknown	unknown
3	City and County of San Francisco	Legal Assistant	\$ 85,692	\$ 104,100	-17.4%	\$ 85,987	7/1/2021	1/8/2022	.50%
4	County of Alameda	Civil Paralegal	\$ 72,821	\$ 89,419	-11.4%	\$ 79,225	12/27/2020	unknown	unknown
6	County of Riverside	Paralegal II	\$ 49,453	\$ 73,173	1.9%	\$ 74,563	5/1/2021	5/1/2022	2.00%
7	County of Orange	Paralegal	\$ 56,347	\$ 75,338	-2.0%	\$ 73,831	7/2/2021	7/1/2022	3.50%
8	County of San Mateo	Paralegal	\$ 71,031	\$ 88,752	-17.5%	\$ 73,220	10/4/2020	unknown	unknown
9	County of Ventura	Senior Paralegal	\$ 60,230	\$ 73,081	-0.7%	\$ 72,569	12/27/2020	12/26/2021	2.00%
10	County of Kern	Senior Paralegal	\$ 48,024	\$ 58,620	1.2%	\$ 59,323	4/21/2021	unknown	unknown
11	County of Contra Costa	Paralegal	\$ 51,735	\$ 62,875	-11.1%	\$ 55,896	7/1/2021	unknown	unknown
12	County of Fresno	Paralegal II	\$ 37,726	\$ 45,864	4.7%	\$ 48,020	4/19/2021	unknown	unknown
13	County of Sacramento	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 75,338	\$ 73,831
% County of San Diego Above/Below	4.7%	6.6%
Number of Matches	11	11

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Paralegal Supervisor									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Supervising Paralegal	\$ 101,760	\$ 123,725	-16.8%	\$ 102,939	6/28/2021	6/27/2022	3.00%
2	County of Los Angeles	Supervising Paralegal	\$ 66,402	\$ 99,735	-3.8%	\$ 95,945	1/1/2021	unknown	unknown
3	County of San Diego	Paralegal Supervisor	\$ 71,136	\$ 87,464		\$ 87,464	6/18/2021	unknown	unknown
4	City and County of San Francisco	N/C							
5	County of Alameda	N/C							
6	County of Contra Costa	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 111,730	\$ 99,442
% County of San Diego Above/Below	-27.7%	-13.7%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Park Ranger									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Park Ranger II	\$ 77,203	\$ 93,365	-16.8%	\$ 77,680	6/14/2021	6/13/2022	3.00%
2	County of San Mateo	Park Ranger II	\$ 70,698	\$ 88,419	-17.5%	\$ 72,946	10/2/2020	unknown	unknown
3	City and County of San Francisco	Park Ranger	\$ 67,944	\$ 82,572	-17.4%	\$ 68,204	7/1/2021	1/8/2022	.50%
4	County of Orange	Park Ranger I	\$ 46,634	\$ 62,442	-2.0%	\$ 61,193	7/2/2021	7/1/2022	3.50%
5	County of San Bernardino	Park Ranger II	\$ 43,597	\$ 59,925	1.9%	\$ 61,063	7/31/2021	7/30/2022	3.00%
6	County of Riverside	Park Ranger II - Parks	\$ 38,982	\$ 57,467	1.9%	\$ 58,559	5/1/2021	5/1/2022	2.00%
7	County of San Diego	Park Ranger	\$ 46,197	\$ 56,742		\$ 56,742	6/18/2021	unknown	unknown
8	County of Ventura	Park Services Ranger I	\$ 41,181	\$ 55,300	-0.7%	\$ 54,913	10/4/2020	unknown	unknown
9	County of Kern	Park Ranger	\$ 37,608	\$ 45,912	1.2%	\$ 46,463	4/21/2021	unknown	unknown
10	County of Alameda	N/C							
11	County of Contra Costa	N/C							
12	County of Fresno	N/C							
13	County of Los Angeles	N/C							
14	County of Sacramento	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 61,183	\$ 61,128
% County of San Diego Above/Below	-7.8%	-7.7%
Number of Matches	8	8

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Parks Recreational Supervisor									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Recreation Supervisor	\$ 88,788	\$ 107,928	-17.4%	\$ 89,149	7/1/2021	1/8/2022	.50%
2	County of Orange	Supervising Park Ranger I	\$ 57,491	\$ 77,459	-2.0%	\$ 75,910	7/2/2021	7/1/2022	3.50%
3	County of Sacramento	Recreation Supervisor	\$ 59,237	\$ 71,994	0.1%	\$ 72,066	6/21/2020	unknown	unknown
4	County of San Diego	Parks Recreational Supervisor	\$ 55,661	\$ 68,411		\$ 68,411	6/18/2021	unknown	unknown
5	County of Los Angeles	Recreation Services Supervisor	\$ 52,535	\$ 70,803	-3.8%	\$ 68,113	1/1/2021	unknown	unknown
6	County of Riverside	Service Area Manager I	\$ 41,366	\$ 61,177	1.9%	\$ 62,340	5/1/2021	5/1/2022	2.00%
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 71,994	\$ 72,066
% County of San Diego Above/Below	-5.2%	-5.3%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Patient Services Specialist III (T)									
1	County of Alameda ¹	[Health Insurance Technician/ Supervising Health Insurance Technician]	\$ 72,758	\$ 85,925	-11.4%	\$ 76,129	12/27/2020	unknown	unknown
2	County of San Mateo	Lead Health Benefits Analyst	\$ 69,699	\$ 87,067	-17.5%	\$ 71,830	10/4/2020	unknown	unknown
3	County of Sacramento	Human Services Quality and Review Specialist	\$ 56,480	\$ 68,653	0.1%	\$ 68,722	6/21/2020	unknown	unknown
5	County of Contra Costa	Senior Patient Financial Services Specialist	\$ 57,862	\$ 70,332	-11.1%	\$ 62,525	7/1/2021	unknown	unknown
6	County of Los Angeles	Patient Financial Services Worker	\$ 45,908	\$ 61,828	-3.8%	\$ 59,479	1/1/2021	unknown	unknown
7	County of Kern	Patient Access Services Representative III	\$ 38,364	\$ 46,836	1.2%	\$ 47,398	4/21/2021	unknown	unknown
8	City and County of San Francisco	N/C							
9	County of Fresno	N/C							
10	County of Orange	N/C							
11	County of Riverside	N/C							
12	County of San Bernardino	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 69,492	\$ 65,623
% County of San Diego Above/Below	-6.5%	-0.6%
Number of Matches	6	6

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Patient Services Specialist IV (T)									
1	County of San Mateo	Health Benefits Supervisor	\$ 87,753	\$ 109,718	-17.5%	\$ 90,517	10/4/2020	unknown	unknown
2	County of Alameda ¹	[Supervising Health Insurance Technician/ Patient Services Supervisor]	\$ 79,331	\$ 96,304	-11.4%	\$ 85,325	9/6/2020	unknown	unknown
3	County of Sacramento	Human Services Supervisor	\$ 69,468	\$ 84,439	0.1%	\$ 84,523	6/21/2020	unknown	unknown
5	County of Contra Costa	Patient Financial Services Supervisor	\$ 65,745	\$ 79,914	-11.1%	\$ 71,043	7/1/2021	unknown	unknown
6	City and County of San Francisco	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Los Angeles	N/C							
10	County of Orange	N/C							
11	County of Riverside	N/C							
12	County of San Bernardino	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 90,371	\$ 84,924
% County of San Diego Above/Below	-21.7%	-14.4%
Number of Matches	4	4

N/C - Non Comparator

1 - County of Alameda: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Payroll Clerk									
1	City and County of San Francisco	Payroll and Personnel Clerk	\$ 70,980	\$ 86,268	-17.4%	\$ 71,257	7/1/2021	1/8/2022	.50%
2	County of Los Angeles	Payroll Clerk II	\$ 45,908	\$ 63,528	-3.8%	\$ 61,114	1/1/2021	unknown	unknown
3	County of Alameda ¹	[Payroll Records Clerk/ Specialist Clerk II]	\$ 56,093	\$ 63,603	-11.4%	\$ 56,352	6/27/2021	6/26/2022	3.25%
4	County of San Bernardino	Payroll Specialist	\$ 35,048	\$ 48,110	1.9%	\$ 49,025	7/31/2021	7/30/2022	3.00%
6	County of Contra Costa	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 63,565	\$ 58,733
% County of San Diego Above/Below	-44.3%	-33.3%
Number of Matches	4	4

N/C - Non Comparator

1 - County of Alameda: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Pediatrician									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Senior Physician Specialist	\$ 212,576	\$ 293,826	-17.4%	\$ 242,700	7/1/2021	1/8/2022	.50%
2	County of Riverside	Physician IV	\$ 190,995	\$ 228,680	1.9%	\$ 233,024	5/1/2021	5/1/2022	2.00%
3	County of Ventura	Primary Care Clinic Pediatrician	\$ 199,500	\$ 231,084	-0.7%	\$ 229,466	unknown	12/26/2021	2.00%
4	County of Los Angeles	Physician, M.D.	\$ 223,649	\$ 223,649	-3.8%	\$ 215,150	1/1/2021	unknown	unknown
5	County of Orange	Physician II	\$ 186,763	\$ 213,940	-2.0%	\$ 209,661	7/2/2021	7/1/2022	3.50%
6	County of San Diego	Pediatrician	\$ 137,322	\$ 168,834		\$ 168,834	6/18/2021	unknown	unknown
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 228,680	\$ 229,466
% County of San Diego Above/Below	-35.4%	-35.9%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Permit Process Coordinator									
1	County of San Mateo	Building Permit Services Supervisor	\$ 87,982	\$ 109,988	-17.5%	\$ 90,740	10/4/2020	unknown	unknown
2	County of Sacramento	Principal Engineering Technician	\$ 70,219	\$ 89,617	0.1%	\$ 89,707	6/21/2020	unknown	unknown
4	City and County of San Francisco	Permit Technician III	\$ 87,096	\$ 105,876	-17.4%	\$ 87,454	7/1/2021	1/8/2022	.50%
5	County of Contra Costa ¹	[Planning Technician II/Manager, Application and Permit Center]	\$ 68,703	\$ 91,750	-11.1%	\$ 81,566	7/1/2021	unknown	unknown
6	County of Alameda	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Los Angeles	N/C							
10	County of Orange	N/C							
11	County of Riverside	N/C							
12	County of San Bernardino	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 98,813	\$ 88,580
% County of San Diego Above/Below	-11.0%	0.5%
Number of Matches	4	4

N/C - Non Comparator

1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Pest Management Technician I									
2	County of Orange	Integrated Pest Management Technician I	\$ 35,755	\$ 48,152	-2.0%	\$ 47,189	7/2/2021	7/1/2022	3.50%
3	County of Ventura	Insect Detection Specialist I	\$ 29,411	\$ 42,307	-0.7%	\$ 42,011	12/26/2020	12/27/2021	2.00%
4	City and County of San Francisco	N/C							
5	County of Alameda	N/C							
6	County of Contra Costa	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Los Angeles	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 45,230	\$ 44,600
% County of San Diego Above/Below	19.5%	20.6%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Pest Management Technician II									
1	City and County of San Francisco	Integrated Pest Management Specialist	\$ 82,392	\$ 100,128	-17.4%	\$ 82,706	7/1/2021	1/8/2022	.50%
2	County of Alameda	Vegetation Technician	\$ 71,781	\$ 75,275	-11.4%	\$ 66,694	10/4/2020	10/3/2021	3.25%
4	County of Orange	Integrated Pest Management Technician II	\$ 44,366	\$ 59,842	-2.0%	\$ 58,645	7/2/2021	7/1/2022	3.50%
5	County of Los Angeles	Pest Exterminator	\$ 42,772	\$ 57,555	-3.8%	\$ 55,368	1/1/2021	unknown	unknown
6	County of Riverside	Agricultural Inspector	\$ 29,120	\$ 45,333	1.9%	\$ 46,194	5/1/2021	5/1/2022	2.00%
7	County of Kern	Spray Equipment Operator	\$ 29,304	\$ 35,784	1.2%	\$ 36,213	4/21/2021	unknown	unknown
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 58,698	\$ 57,007
% County of San Diego Above/Below	4.9%	7.7%
Number of Matches	6	6

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Pharmacist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Riverside	Clinical Pharmacist II	\$ 105,428	\$ 173,864	1.9%	\$ 177,167	5/1/2021	5/1/2022	2.00%
2	County of Santa Clara	Pharmacist	\$ 155,532	\$ 188,510	-16.8%	\$ 156,841	6/14/2021	6/13/2022	3.00%
3	City and County of San Francisco	Pharmacist	\$ 147,156	\$ 187,800	-17.4%	\$ 155,123	7/1/2021	1/8/2022	.50%
4	County of Los Angeles	Pharmacist	\$ 138,443	\$ 158,550	-3.8%	\$ 152,525	1/1/2021	unknown	unknown
5	County of Sacramento	Pharmacist	\$ 140,314	\$ 147,329	0.1%	\$ 147,476	6/21/2020	unknown	unknown
6	County of Contra Costa	Pharmacist I	\$ 141,079	\$ 163,317	-11.1%	\$ 145,188	7/1/2021	unknown	unknown
7	County of Kern	Pharmacist	\$ 116,148	\$ 141,792	1.2%	\$ 143,494	4/21/2021	unknown	unknown
8	County of Orange	Pharmacist	\$ 108,493	\$ 146,307	-2.0%	\$ 143,381	7/2/2021	7/1/2022	3.50%
9	County of Alameda ¹	[Pharmacist, Alameda County Behavioral Health/ Senior Clinical Pharmacist, Alameda County Behavioral Health]	\$ 132,735	\$ 161,356	-11.4%	\$ 142,961	6/27/2021	6/26/2022	3.25%
10	County of San Mateo	Pharmacist	\$ 137,589	\$ 171,992	-17.5%	\$ 141,893	10/4/2020	unknown	unknown
11	County of San Diego	Pharmacist	\$ 111,134	\$ 136,635		\$ 136,635	6/18/2021	unknown	unknown
12	County of Ventura	Pharmacist I	\$ 83,090	\$ 116,243	-0.7%	\$ 115,430	12/27/2020	12/26/2021	2.00%
13	County of Fresno	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 161,356	\$ 145,188
% County of San Diego Above/Below	-18.1%	-6.3%
Number of Matches	11	11

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Pharmacy Stock Clerk									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Pharmacy Helper	\$ 74,148	\$ 90,144	-17.4%	\$ 74,459	7/1/2021	1/8/2022	.50%
2	County of Sacramento	Pharmacy Assistant	\$ 41,885	\$ 50,905	0.1%	\$ 50,956	6/21/2020	unknown	unknown
3	County of San Bernardino	Sheriff's Medical Stores Specialist	\$ 35,797	\$ 49,296	1.9%	\$ 50,233	7/31/2021	7/30/2022	3.00%
4	County of Orange	Store Clerk	\$ 37,606	\$ 49,650	-2.0%	\$ 48,657	7/2/2021	7/1/2022	3.50%
5	County of Los Angeles	Pharmacy Helper	\$ 37,593	\$ 50,502	-3.8%	\$ 48,582	1/1/2021	unknown	unknown
6	County of Santa Clara	Pharmacy Assistant	\$ 45,500	\$ 54,704	-16.8%	\$ 45,514	6/14/2021	6/13/2022	3.00%
7	County of San Diego	Pharmacy Stock Clerk	\$ 35,006	\$ 43,035		\$ 43,035	6/18/2021	unknown	unknown
8	County of Alameda	N/C							
9	County of Contra Costa	N/C							
10	County of Fresno	N/C							
11	County of Kern	N/C							
12	County of Riverside	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 50,703	\$ 49,445
% County of San Diego Above/Below	-17.8%	-14.9%
Number of Matches	6	6

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Pharmacy Storekeeper									
1	City and County of San Francisco	Senior Pharmacy Helper	\$ 74,496	\$ 90,528	-17.4%	\$ 74,776	7/1/2021	1/8/2022	.50%
3	County of Alameda	N/C							
4	County of Contra Costa	N/C							
5	County of Fresno	N/C							
6	County of Kern	N/C							
7	County of Los Angeles	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 90,528	\$ 74,776
% County of San Diego Above/Below	-85.9%	-53.6%
Number of Matches	1	1

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Pharmacy Technician									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Pharmacy Technician	\$ 84,816	\$ 103,092	-17.4%	\$ 85,154	7/1/2021	1/8/2022	.50%
2	County of San Mateo	Pharmacy Technician	\$ 66,829	\$ 83,531	-17.5%	\$ 68,913	10/4/2020	unknown	unknown
3	County of Santa Clara	Pharmacy Technician	\$ 65,782	\$ 79,421	-16.8%	\$ 66,078	6/14/2021	6/13/2022	3.00%
4	County of Contra Costa	Pharmacy Technician	\$ 56,010	\$ 68,080	-11.1%	\$ 60,523	7/1/2021	unknown	unknown
5	County of Sacramento	Pharmacy Technician	\$ 46,061	\$ 56,000	0.1%	\$ 56,056	6/21/2020	unknown	unknown
6	County of San Diego	Pharmacy Technician	\$ 45,178	\$ 55,557		\$ 55,557	6/18/2021	unknown	unknown
7	County of Riverside	Pharmacy Technician II	\$ 34,551	\$ 53,924	1.9%	\$ 54,948	5/1/2021	5/1/2022	2.00%
8	County of Los Angeles	Pharmacy Technician	\$ 40,448	\$ 54,382	-3.8%	\$ 52,315	1/1/2021	unknown	unknown
9	County of Orange	Pharmacy Technician	\$ 38,688	\$ 52,166	-2.0%	\$ 51,123	7/2/2021	7/1/2022	3.50%
10	County of Kern	Pharmacy Technician II	\$ 35,424	\$ 43,248	1.2%	\$ 43,767	4/21/2021	unknown	unknown
11	County of Ventura	Pharmacy Technician II	\$ 30,294	\$ 42,266	-0.7%	\$ 41,970	12/26/2020	12/27/2021	2.00%
12	County of Alameda	N/C							
13	County of Fresno	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 55,191	\$ 55,502
% County of San Diego Above/Below	0.7%	0.1%
Number of Matches	10	10

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Photographic Audio-Visual Specialist									
1	County of Los Angeles	Video Production Specialist	\$ 69,586	\$ 93,779	-3.8%	\$ 90,215	1/1/2021	unknown	unknown
2	County of Contra Costa	Sheriff's Photographer	\$ 77,913	\$ 97,071	-11.1%	\$ 86,296	7/1/2021	7/1/2022	5.00%
4	County of San Bernardino	Multimedia Production Specialist II	\$ 53,498	\$ 75,296	1.9%	\$ 76,727	3/13/2021	3/26/2022	3.00%
5	County of Sacramento	Public Information Specialist	\$ 60,093	\$ 73,059	0.1%	\$ 73,132	6/21/2020	unknown	unknown
6	County of Alameda	Sheriff's Multimedia Producer	\$ 62,878	\$ 75,442	-11.4%	\$ 66,841	6/27/2021	6/26/2022	3.25%
7	County of Ventura	Photographic/Imaging Services Technician	\$ 43,356	\$ 60,616	-0.7%	\$ 60,192	12/26/2020	12/27/2021	2.00%
8	County of Fresno	Multimedia Technician II	\$ 38,714	\$ 47,034	4.7%	\$ 49,245	11/2/2020	unknown	unknown
9	City and County of San Francisco	N/C							
10	County of Kern	N/C							
11	County of Orange	N/C							
12	County of Riverside	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 75,296	\$ 73,132
% County of San Diego Above/Below	2.5%	5.3%
Number of Matches	7	7

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Physician Assistant									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Physician Assistant	\$ 175,296	\$ 248,148	-17.4%	\$ 204,970	7/1/2021	1/8/2022	.50%
2	County of San Mateo	Physicians Assistant	\$ 158,306	\$ 197,887	-17.5%	\$ 163,257	10/2/2020	unknown	unknown
3	County of Los Angeles	Physician Assistant	\$ 113,376	\$ 152,783	-3.8%	\$ 146,977	1/1/2021	unknown	unknown
4	County of Kern	Physician's Assistant	\$ 106,128	\$ 129,612	1.2%	\$ 131,167	4/21/2021	unknown	unknown
5	County of San Bernardino	Physician Assistant	\$ 91,021	\$ 128,440	1.9%	\$ 130,880	3/13/2021	3/26/2022	3.00%
6	County of Riverside	Physician Assistant II	\$ 91,539	\$ 121,943	1.9%	\$ 124,260	5/1/2021	5/1/2022	2.00%
7	County of Alameda	Mid-Level Practitioner	\$ 105,447	\$ 137,124	-11.4%	\$ 121,492	6/27/2021	6/26/2022	3.25%
8	County of Ventura	Physician Assistant	\$ 101,612	\$ 106,953	-0.7%	\$ 106,204	3/21/2021	4/3/2022	2.50%
9	County of San Diego	Physician Assistant	\$ 84,053	\$ 103,230		\$ 103,230	6/18/2021	unknown	unknown
10	County of Sacramento	Physician Assistant	\$ 74,333	\$ 90,348	0.1%	\$ 90,438	6/21/2020	unknown	unknown
11	County of Contra Costa	N/C							
12	County of Fresno	N/C							
13	County of Orange	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 129,612	\$ 130,880
% County of San Diego Above/Below	-25.6%	-26.8%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Precinct Planning Technician									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Precinct Planning Specialist	\$ 76,650	\$ 92,760	-16.8%	\$ 77,176	6/14/2021	6/13/2022	3.00%
2	County of Ventura	Elections Precinct Coordinator	\$ 45,193	\$ 63,271	-0.7%	\$ 62,828	12/27/2020	12/26/2021	2.00%
3	County of Contra Costa	Elections Services Technician	\$ 50,024	\$ 60,805	-11.1%	\$ 54,056	7/1/2021	unknown	unknown
4	County of San Diego	Precinct Planning Technician	\$ 38,126	\$ 51,688		\$ 51,688	6/18/2021	unknown	unknown
5	City and County of San Francisco	N/C							
6	County of Alameda	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Los Angeles	N/C							
10	County of Orange	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 63,271	\$ 62,828
% County of San Diego Above/Below	-22.4%	-21.6%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Principal Treasurer-Tax Collector Specialist									
1	County of Los Angeles	Head, Tax Services	\$ 71,855	\$ 99,488	-3.8%	\$ 95,707	1/1/2021	unknown	unknown
2	County of Alameda	Treasurer-Tax Collector Supervisor	\$ 86,757	\$ 104,166	-11.4%	\$ 92,291	12/27/2020	12/26/2021	3.00%
3	County of Santa Clara	Supervising Tax Collection Clerk	\$ 76,685	\$ 93,186	-16.8%	\$ 77,531	6/28/2021	6/27/2022	3.00%
4	County of Contra Costa ¹	[Account Clerk - Advanced Level/Tax Operations Supervisor]	\$ 65,169	\$ 80,745	-11.1%	\$ 71,782	7/1/2021	unknown	unknown
6	County of Fresno	Tax Collections Supervisor	\$ 47,944	\$ 58,292	4.7%	\$ 61,032	4/19/2021	unknown	unknown
7	City and County of San Francisco	N/C							
8	County of Kern	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 93,186	\$ 77,531
% County of San Diego Above/Below	-40.8%	-17.2%
Number of Matches	5	5

N/C - Non Comparator

1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Probation Aide									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Ventura	Program Assistant	\$ 63,341	\$ 88,686	-0.7%	\$ 88,065	unknown	unknown	unknown
2	County of Alameda	Probation Aide	\$ 61,318	\$ 74,651	-11.4%	\$ 66,141	9/20/2020	unknown	unknown
3	City and County of San Francisco	Probation Assistant	\$ 61,908	\$ 75,216	-17.4%	\$ 62,128	7/1/2021	1/8/2022	.50%
4	County of Contra Costa	Administrative Aide	\$ 42,585	\$ 66,063	-11.1%	\$ 58,730	7/1/2021	unknown	unknown
5	County of Santa Clara	Law Enforcement Clerk	\$ 54,207	\$ 65,453	-16.8%	\$ 54,457	6/14/2021	6/13/2022	3.00%
6	County of San Diego	Probation Aide	\$ 44,179	\$ 54,288		\$ 54,288	6/18/2021	unknown	unknown
7	County of Riverside	Probation Assistant	\$ 32,625	\$ 50,929	1.9%	\$ 51,897	5/1/2021	5/1/2022	2.00%
8	County of Fresno	Probation Technician II	\$ 36,842	\$ 44,772	4.7%	\$ 46,876	10/19/2020	unknown	unknown
9	County of Kern	N/C							
10	County of Los Angeles	N/C							
11	County of Orange	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 66,063	\$ 58,730
% County of San Diego Above/Below	-21.7%	-8.2%
Number of Matches	7	7

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Probation Operations Support Manager									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Mateo	Administrative Services Manager I	\$ 115,438	\$ 144,287	-17.5%	\$ 119,037	12/13/2020	unknown	unknown
2	County of Contra Costa	Administrative Services Assistant III	\$ 81,746	\$ 99,363	-11.1%	\$ 88,334	7/1/2021	unknown	unknown
3	County of San Diego	Probation Operations Support Manager	\$ 67,954	\$ 83,533		\$ 83,533	6/18/2021	unknown	unknown
4	County of San Bernardino	Probation Office Operations Manager	\$ 50,440	\$ 69,389	1.9%	\$ 70,707	7/31/2021	7/30/2022	3.00%
5	County of Ventura	Clerical Supervisor III	\$ 50,221	\$ 70,345	-0.7%	\$ 69,853	12/26/2020	12/27/2021	2.00%
6	City and County of San Francisco	N/C							
7	County of Alameda	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Los Angeles	N/C							
11	County of Orange	N/C							
12	County of Riverside	N/C							
13	County of Sacramento	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 84,854	\$ 79,520
% County of San Diego Above/Below	-1.6%	4.8%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Process Server									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Legal Process Officer	\$ 55,987	\$ 67,569	-16.8%	\$ 56,217	6/14/2021	6/13/2022	3.00%
2	County of Sacramento	Process Server	\$ 44,704	\$ 54,330	0.1%	\$ 54,384	6/21/2021	unknown	unknown
3	County of Ventura	Investigative Assistant II	\$ 38,366	\$ 53,899	-0.7%	\$ 53,521	12/26/2020	12/27/2021	2.00%
4	County of San Bernardino	Investigative Technician I	\$ 35,797	\$ 49,296	1.9%	\$ 50,233	7/31/2021	7/30/2022	3.00%
5	County of Fresno	Process Server	\$ 37,544	\$ 45,656	4.7%	\$ 47,802	10/19/2020	unknown	unknown
6	County of San Diego	Process Server	\$ 38,501	\$ 47,382		\$ 47,382	6/18/2021	unknown	unknown
7	City and County of San Francisco	N/C							
8	County of Alameda	N/C							
9	County of Contra Costa	N/C							
10	County of Kern	N/C							
11	County of Los Angeles	N/C							
12	County of Orange	N/C							
13	County of Riverside	N/C							
14	County of San Mateo	N/C							

Summary Results		Top Annual	Adjusted Top Annual
Median of Comparators		\$ 53,899	\$ 53,521
% County of San Diego Above/Below		-13.8%	-13.0%
Number of Matches		5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Process Server Supervisor									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Sacramento	Supervising Process Server	\$ 48,671	\$ 59,153	0.1%	\$ 59,212	6/21/2020	unknown	unknown
2	County of San Diego	Process Server Supervisor	\$ 44,637	\$ 54,246		\$ 54,246	6/18/2021	unknown	unknown
3	County of Fresno	Supervising Process Server	\$ 41,496	\$ 50,440	4.7%	\$ 52,811	4/19/2021	unknown	unknown
4	City and County of San Francisco	N/C							
5	County of Alameda	N/C							
6	County of Contra Costa	N/C							
7	County of Kern	N/C							
8	County of Los Angeles	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 54,797	\$ 56,011
% County of San Diego Above/Below	-1.0%	-3.3%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Procurement Contracting Officer									
1	County of Los Angeles	Principal Purchasing & Contracts Analyst	\$ 89,263	\$ 120,288	-3.8%	\$ 115,717	1/1/2021	unknown	unknown
2	City and County of San Francisco	Senior Purchaser	\$ 107,148	\$ 130,308	-17.4%	\$ 107,634	7/1/2021	1/8/2022	.50%
3	County of Riverside	Senior Procurement Contract Specialist	\$ 62,479	\$ 102,875	1.9%	\$ 104,830	5/1/2021	5/1/2022	2.00%
5	County of Sacramento	Senior Contract Services Officer	\$ 79,114	\$ 96,152	0.1%	\$ 96,248	6/21/2020	unknown	unknown
6	County of Contra Costa	Senior Buyer	\$ 81,746	\$ 99,363	-11.1%	\$ 88,334	7/1/2021	unknown	unknown
7	County of Alameda ¹	[Procurement and Contracts Specialist II/ Procurement and Contracts Supervisor]	\$ 82,357	\$ 99,407	-11.4%	\$ 88,075	12/27/2020	12/26/2021	3.00%
8	County of Santa Clara	Buyer III	\$ 86,501	\$ 104,664	-16.8%	\$ 87,080	6/14/2021	6/13/2022	3.00%
9	County of San Bernardino	Buyer III	\$ 61,381	\$ 84,365	1.9%	\$ 85,968	7/31/2021	7/30/2022	3.00%
10	County of Fresno	Purchasing Analyst III	\$ 62,478	\$ 75,920	4.7%	\$ 79,488	4/19/2021	unknown	unknown
11	County of Kern	Contract Administrator	\$ 55,224	\$ 67,416	1.2%	\$ 68,225	4/21/2021	unknown	unknown
12	County of Orange	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 99,385	\$ 88,204
% County of San Diego Above/Below	-0.0%	11.2%
Number of Matches	10	10

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Procurement Contracting Specialist									
1	County of Riverside	Procurement Contract Specialist	\$ 59,142	\$ 97,399	1.9%	\$ 99,249	5/1/2021	5/1/2022	2.00%
2	County of Los Angeles	Purchasing and Contracts Analyst II	\$ 75,861	\$ 102,219	-3.8%	\$ 98,335	1/1/2021	unknown	unknown
3	County of Orange	Procurement Contract Specialist	\$ 68,432	\$ 92,248	-2.0%	\$ 90,403	7/2/2021	7/1/2022	3.50%
4	City and County of San Francisco	Purchaser	\$ 88,140	\$ 107,148	-17.4%	\$ 88,504	7/1/2021	1/8/2022	.50%
5	County of Alameda	Procurement and Contracts Specialist II	\$ 78,340	\$ 93,803	-11.4%	\$ 83,110	6/27/2021	6/26/2022	3.25%
7	County of Sacramento	Contract Services Officer II	\$ 65,960	\$ 80,179	0.1%	\$ 80,259	6/21/2020	unknown	unknown
8	County of Contra Costa	Buyer II	\$ 73,601	\$ 89,463	-11.1%	\$ 79,533	7/1/2021	unknown	unknown
9	County of Santa Clara	Buyer II	\$ 72,238	\$ 87,360	-16.8%	\$ 72,684	6/14/2021	6/13/2022	3.00%
10	County of San Bernardino	Buyer II	\$ 51,771	\$ 71,032	1.9%	\$ 72,382	7/31/2021	7/30/2022	3.00%
11	County of Fresno	Purchasing Analyst II	\$ 54,080	\$ 65,728	4.7%	\$ 68,817	4/19/2021	unknown	unknown
12	County of Kern	Buyer III	\$ 47,076	\$ 57,468	1.2%	\$ 58,158	4/21/2021	unknown	unknown
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 89,463	\$ 80,259
% County of San Diego Above/Below	-7.7%	3.4%
Number of Matches	11	11

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Procurement Specialist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Los Angeles	Purchasing and Contracts Analyst I	\$ 64,468	\$ 86,869	-3.8%	\$ 83,568	1/1/2021	unknown	unknown
2	County of Orange	Procurement Buyer	\$ 61,402	\$ 82,763	-2.0%	\$ 81,108	7/2/2021	7/1/2022	3.50%
3	County of San Mateo	Buyer II	\$ 76,335	\$ 95,408	-17.5%	\$ 78,711	10/4/2020	unknown	unknown
4	County of San Diego	Procurement Specialist	\$ 57,512	\$ 70,678		\$ 70,678	6/18/2021	unknown	unknown
5	County of Ventura	Senior Buyer	\$ 50,564	\$ 70,716	-0.7%	\$ 70,221	12/27/2020	12/26/2021	2.00%
6	County of Fresno	Purchasing Analyst II	\$ 54,080	\$ 65,728	4.7%	\$ 68,817	4/19/2021	unknown	unknown
7	County of Santa Clara	Buyer I	\$ 64,133	\$ 77,440	-16.8%	\$ 64,430	6/14/2021	6/13/2022	3.00%
8	County of Contra Costa	Buyer I	\$ 55,781	\$ 67,802	-11.1%	\$ 60,276	7/1/2021	unknown	unknown
9	County of Kern	Buyer II	\$ 43,032	\$ 52,536	1.2%	\$ 53,166	4/21/2021	unknown	unknown
10	City and County of San Francisco	N/C							
11	County of Alameda	N/C							
12	County of Riverside	N/C							
13	County of Sacramento	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 74,078	\$ 69,519
% County of San Diego Above/Below	-4.8%	1.6%
Number of Matches	8	8

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Property Assessment Specialist I									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Ventura	Assessor's Technician I	\$ 44,477	\$ 56,931	-0.7%	\$ 56,533	1/10/2021	1/9/2022	2.00%
2	County of Fresno	Assessment Technician I	\$ 41,002	\$ 49,842	4.7%	\$ 52,185	4/19/2021	unknown	unknown
3	County of San Diego	Property Assessment Specialist I	\$ 41,933	\$ 51,501		\$ 51,501	6/18/2021	unknown	unknown
4	County of Orange	Assessment Technician Trainee	\$ 36,920	\$ 48,942	-2.0%	\$ 47,964	7/2/2021	7/1/2022	3.50%
5	City and County of San Francisco	N/C							
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Kern	N/C							
9	County of Los Angeles	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 49,842	\$ 52,185
% County of San Diego Above/Below	3.2%	-1.3%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Property Assessment Specialist II									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Assessor-Recorder Office Specialist	\$ 66,144	\$ 80,392	-17.4%	\$ 66,404	7/1/2021	1/8/2022	.50%
2	County of Ventura	Assessor's Technician II	\$ 49,491	\$ 63,348	-0.7%	\$ 62,904	1/10/2021	1/9/2022	2.00%
3	County of Santa Clara	Appraisal Aide	\$ 62,483	\$ 75,492	-16.8%	\$ 62,809	6/14/2021	6/13/2022	3.00%
4	County of Fresno	Assessment Technician II	\$ 46,488	\$ 56,524	4.7%	\$ 59,181	4/19/2021	unknown	unknown
5	County of San Diego	Property Assessment Specialist II	\$ 47,736	\$ 58,656		\$ 58,656	6/18/2021	unknown	unknown
6	County of Contra Costa	Clerk - Specialist Level	\$ 50,943	\$ 65,057	-11.1%	\$ 57,835	7/1/2021	unknown	unknown
7	County of Sacramento	Assessment Technician	\$ 46,771	\$ 56,877	0.1%	\$ 56,934	6/21/2020	unknown	unknown
8	County of Orange	Assessment Technician II	\$ 42,640	\$ 57,158	-2.0%	\$ 56,015	7/2/2021	7/1/2022	3.50%
9	County of Kern	Appraisal Assistant	\$ 32,064	\$ 39,144	1.2%	\$ 39,614	4/21/2021	unknown	unknown
10	County of Alameda	N/C							
11	County of Los Angeles	N/C							
12	County of Riverside	N/C							
13	County of San Bernardino	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 60,253	\$ 58,508
% County of San Diego Above/Below	-2.7%	0.3%
Number of Matches	8	8

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Property Assessment Specialist III									
1	City and County of San Francisco	Assessor-Recorder Senior Office Specialist	\$ 73,060	\$ 93,210	-17.4%	\$ 76,991	7/1/2021	1/8/2022	.50%
3	County of Ventura	Assessor's Technician III	\$ 53,893	\$ 68,983	-0.7%	\$ 68,500	1/10/2021	1/9/2022	2.00%
4	County of Orange	Assessment Technician III	\$ 48,942	\$ 65,354	-2.0%	\$ 64,046	7/2/2021	7/1/2022	3.50%
5	County of Fresno	Assessment Technician III	\$ 50,284	\$ 61,152	4.7%	\$ 64,026	4/19/2021	unknown	unknown
6	County of Santa Clara	Appraisal Data Coordinator	\$ 58,689	\$ 70,849	-16.8%	\$ 58,946	6/14/2021	6/13/2022	3.00%
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Kern	N/C							
10	County of Los Angeles	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 68,983	\$ 64,046
% County of San Diego Above/Below	2.1%	9.1%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Protective Services Assistant									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Contra Costa	Social Casework Assistant	\$ 69,561	\$ 84,551	-11.1%	\$ 75,166	7/1/2021	unknown	unknown
2	County of Los Angeles	Human Services Aide	\$ 41,041	\$ 55,194	-3.8%	\$ 53,096	1/1/2021	unknown	unknown
3	County of Ventura	HS Case Aide II	\$ 38,517	\$ 51,362	-0.7%	\$ 51,002	12/27/2020	12/26/2021	2.00%
4	County of San Bernardino	Social Service Aide	\$ 33,322	\$ 45,802	1.9%	\$ 46,672	7/31/2021	7/30/2022	3.00%
5	County of San Diego	Protective Services Assistant	\$ 35,568	\$ 45,968		\$ 45,968	6/18/2021	unknown	unknown
6	County of Sacramento	Family Services Worker I	\$ 35,287	\$ 42,908	0.1%	\$ 42,951	6/21/2020	unknown	unknown
7	County of Fresno	Social Worker Aide II	\$ 29,692	\$ 36,842	4.7%	\$ 38,574	11/2/2020	unknown	unknown
8	City and County of San Francisco	N/C							
9	County of Alameda	N/C							
10	County of Kern	N/C							
11	County of Orange	N/C							
12	County of Riverside	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 48,582	\$ 48,837
% County of San Diego Above/Below	-5.7%	-6.2%
Number of Matches	6	6

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Protective Services Supervisor									
1	City and County of San Francisco	Protective Services Supervisor	\$ 107,460	\$ 137,232	-17.4%	\$ 113,354	7/1/2021	1/8/2022	.50%
2	County of San Mateo	Children's Services Social Work Supervisor	\$ 108,740	\$ 135,925	-17.5%	\$ 112,138	10/4/2020	unknown	unknown
3	County of Alameda	Child Welfare Supervisor	\$ 96,533	\$ 116,522	-11.4%	\$ 103,238	9/6/2020	unknown	unknown
4	County of Contra Costa	Social Work Supervisor II	\$ 94,644	\$ 115,041	-11.1%	\$ 102,272	7/1/2021	unknown	unknown
5	County of Sacramento	Human Services Supervisor - Master's Degree	\$ 83,019	\$ 100,913	0.1%	\$ 101,014	6/21/2020	unknown	unknown
6	County of Ventura	HS Child Welfare Supervisor	\$ 97,165	\$ 99,434	-0.7%	\$ 98,738	12/26/2020	12/27/2021	2.00%
7	County of San Bernardino	Supervising Social Service Practitioner	\$ 69,243	\$ 95,326	1.9%	\$ 97,138	7/31/2021	7/30/2022	3.00%
9	County of Fresno	Social Work Supervisor	\$ 64,350	\$ 82,290	4.7%	\$ 86,158	11/2/2020	unknown	unknown
10	County of Orange	Social Services Supervisor I	\$ 63,440	\$ 85,613	-2.0%	\$ 83,901	7/2/2021	7/1/2022	3.50%
11	County of Kern	N/C							
12	County of Los Angeles	N/C							
13	County of Riverside	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 100,913	\$ 101,014
% County of San Diego Above/Below	-8.2%	-8.3%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Protective Services Worker									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Protective Services Worker	\$ 95,676	\$ 122,040	-17.4%	\$ 100,805	7/1/2021	1/8/2022	.50%
2	County of Alameda	Child Welfare Worker II	\$ 88,287	\$ 101,333	-11.4%	\$ 89,781	6/27/2021	6/26/2022	3.25%
3	County of San Bernardino	Social Service Practitioner II	\$ 57,554	\$ 81,078	1.9%	\$ 82,619	3/13/2021	3/26/2022	3.00%
4	County of San Mateo	Children's Services Social Worker II	\$ 78,290	\$ 97,862	-17.5%	\$ 80,736	10/4/2020	unknown	unknown
5	County of Contra Costa	Social Worker II	\$ 78,259	\$ 86,280	-11.1%	\$ 76,703	7/1/2021	unknown	unknown
6	County of Ventura	HS Child Welfare Social Worker II	\$ 57,333	\$ 76,444	-0.7%	\$ 75,909	12/26/2020	12/27/2021	2.00%
7	County of San Diego	Protective Services Worker	\$ 58,448	\$ 75,379		\$ 75,379	6/18/2021	unknown	unknown
8	County of Santa Clara	Social Worker I	\$ 74,310	\$ 89,796	-16.8%	\$ 74,710	6/14/2021	6/13/2022	3.00%
9	County of Sacramento	Human Services Social Worker	\$ 60,322	\$ 73,310	0.1%	\$ 73,383	6/21/2020	unknown	unknown
10	County of Orange	Social Worker II	\$ 55,578	\$ 74,651	-2.0%	\$ 73,158	7/2/2021	7/1/2022	3.50%
11	County of Los Angeles	Social Worker	\$ 50,254	\$ 75,488	-3.8%	\$ 72,619	1/1/2021	unknown	unknown
12	County of Fresno	Social Worker II	\$ 44,980	\$ 57,538	4.7%	\$ 60,242	11/2/2020	unknown	unknown
13	County of Kern	N/C							
14	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 81,078	\$ 75,909
% County of San Diego Above/Below	-7.6%	-0.7%
Number of Matches	11	11

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Psychiatric Clinical Nurse Specialist									
1	City and County of San Francisco	Clinical Nurse Specialist	\$ 175,368	\$ 248,196	-17.4%	\$ 205,010	7/1/2021	1/8/2022	.50%
2	County of Los Angeles	Clinical Nurse Specialist	\$ 118,224	\$ 176,967	-3.8%	\$ 170,242	1/1/2021	unknown	unknown
3	County of Contra Costa	Clinical Nurse Specialist	\$ 143,368	\$ 179,047	-11.1%	\$ 159,173	1/1/2021	unknown	unknown
4	County of Alameda	Clinical Nurse Specialist	\$ 114,038	\$ 153,059	-11.4%	\$ 135,611	6/27/2021	6/26/2022	3.25%
5	County of Ventura ¹	[Senior Registered Nurse - Mental Health/ Senior Registered Nurse - Mental Health Acute Care]	\$ 105,400	\$ 126,015	-0.7%	\$ 125,133	4/4/2021	4/17/2022	3.25%
6	County of Orange	Comprehensive Care Nurse II	\$ 92,248	\$ 124,301	-2.0%	\$ 121,815	7/2/2021	7/1/2022	3.50%
8	County of Sacramento	Senior Psychiatric Nurse	\$ 92,164	\$ 112,402	0.1%	\$ 112,514	8/2/2020	unknown	unknown
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of Riverside	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 153,059	\$ 135,611
% County of San Diego Above/Below	-35.6%	-20.2%
Number of Matches	7	7

N/C - Non Comparator

1 - County of Ventura: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Psychiatric Nurse									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Psychiatric Nurse II	\$ 141,912	\$ 190,203	-16.8%	\$ 158,249	10/19/2020	11/1/2021	3%
2	City and County of San Francisco	Registered Nurse	\$ 141,518	\$ 185,848	-17.4%	\$ 153,510	7/1/2021	1/8/2022	.50%
3	County of Contra Costa	Registered Nurse	\$ 124,777	\$ 155,829	-11.1%	\$ 138,532	1/1/2021	unknown	unknown
4	County of Los Angeles	Registered Nurse II	\$ 85,408	\$ 127,845	-3.8%	\$ 122,987	1/1/2021	unknown	unknown
5	County of San Mateo ¹	Psychiatric Nurse	\$ 123,737	\$ 146,242	-17.5%	\$ 120,650	2/7/2021	unknown	unknown
6	County of Ventura	Registered Nurse - Mental Health	\$ 89,199	\$ 110,566	-0.7%	\$ 109,792	4/4/2021	4/17/2022	3.25%
7	County of San Bernardino	Mental Health Nurse II	\$ 75,858	\$ 101,982	1.9%	\$ 103,920	8/15/2020	unknown	unknown
8	County of Sacramento	Psychiatric Nurse	\$ 91,287	\$ 100,662	0.1%	\$ 100,763	8/2/2020	unknown	unknown
9	County of San Diego	Psychiatric Nurse	\$ 80,101	\$ 98,384		\$ 98,384	6/18/2021	unknown	unknown
10	County of Fresno	Mental Health Nurse II	\$ 76,414	\$ 92,872	4.7%	\$ 97,237	11/2/2020	unknown	unknown
11	County of Riverside	Registered Nurse II	\$ 76,023	\$ 93,416	1.9%	\$ 95,190	5/1/2021	5/1/2022	2.00%
12	County of Orange	Behavioral Health Nurse	\$ 69,826	\$ 93,995	-2.0%	\$ 92,115	7/2/2021	7/1/2022	3.50%
13	County of Kern	Behavioral Health Nurse II	\$ 69,456	\$ 84,792	1.2%	\$ 85,810	4/21/2021	unknown	unknown
14	County of Alameda	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 106,274	\$ 106,856
% County of San Diego Above/Below	-8.0%	-8.6%
Number of Matches	12	12

N/C - Non Comparator

1 - County of San Mateo: Bottom of range is step 2.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Psychiatric Resident									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Riverside	Staff Psychiatrist I	\$ 213,940	\$ 282,852	1.9%	\$ 288,226	7/1/2021	7/14/2022	2.00%
2	County of San Mateo ¹	Psychiatric Resident - Psych Emergency Services	N/A	\$ 301,781	-17.5%	\$ 248,970	unknown	unknown	unknown
3	County of Orange	Physician I	\$ 146,307	\$ 197,163	-2.0%	\$ 193,220	7/2/2021	7/1/2022	3.50%
4	County of San Diego	Psychiatric Resident	\$ 150,675	\$ 185,058		\$ 185,058	6/18/2021	unknown	unknown
5	City and County of San Francisco	N/C							
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Los Angeles	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 282,852	\$ 248,970
% County of San Diego Above/Below	-52.8%	-34.5%
Number of Matches	3	3

N/C - Non Comparator

1 - County of San Mateo: No range - only 1 step.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Psychiatric Technician									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Psychiatric Technician	\$ 77,868	\$ 94,644	-17.4%	\$ 78,176	7/1/2021	1/8/2022	.50%
2	County of Santa Clara	Psychiatric Technician II	\$ 71,664	\$ 86,530	-16.8%	\$ 71,993	6/14/2021	6/13/2022	3.00%
3	County of San Mateo	Licensed Psychiatric Technician	\$ 67,245	\$ 84,093	-17.5%	\$ 69,377	10/4/2020	unknown	unknown
4	County of Ventura	Psychiatrist Technician - IPU	\$ 63,120	\$ 67,939	-0.7%	\$ 67,463	3/21/2021	4/3/2022	2.50%
5	County of Sacramento	Mental Health Worker - Licensed	\$ 52,263	\$ 63,517	0.1%	\$ 63,580	6/21/2020	unknown	unknown
6	County of Contra Costa	Psychiatric Technician	\$ 55,362	\$ 70,699	-11.1%	\$ 62,851	7/1/2021	unknown	unknown
7	County of Los Angeles	Psychiatric Technician II	\$ 46,130	\$ 62,134	-3.8%	\$ 59,773	1/1/2021	unknown	unknown
8	County of San Bernardino	Psychiatric Technician I	\$ 40,227	\$ 55,286	1.9%	\$ 56,337	7/31/2021	7/30/2022	3.00%
9	County of Riverside	Licensed Psychiatric Technician	\$ 35,537	\$ 52,485	1.9%	\$ 53,483	5/1/2021	5/1/2022	2.00%
10	County of San Diego	Psychiatric Technician	\$ 52,707	\$ 52,707		\$ 52,707	6/18/2021	unknown	unknown
11	County of Fresno	Psychiatric Technician II	\$ 39,130	\$ 50,076	4.7%	\$ 52,430	11/2/2020	unknown	unknown
12	County of Kern	Mental Health Technician II	\$ 31,896	\$ 38,940	1.2%	\$ 39,407	4/21/2021	unknown	unknown
13	County of Alameda	N/C							
14	County of Orange	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 63,517	\$ 62,851
% County of San Diego Above/Below	-20.5%	-19.2%
Number of Matches	11	11

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Psychiatrist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Riverside	Staff Psychiatrist III	\$ 245,309	\$ 307,519	1.9%	\$ 313,362	7/1/2021	7/14/2022	2.00%
2	County of San Bernardino	Psychiatrist I	\$ 252,970	\$ 300,248	1.9%	\$ 305,953	3/13/2021	3/26/2022	3.00%
3	County of Los Angeles	Mental Health Psychiatrist	\$ 309,699	\$ 309,699	-3.8%	\$ 297,930	1/1/2021	unknown	unknown
4	County of Orange	Psychiatrist	\$ 194,917	\$ 269,402	-2.0%	\$ 264,014	7/2/2021	7/1/2022	3.50%
5	County of San Mateo	Adult Psychiatrist	\$ 241,400	\$ 301,781	-17.5%	\$ 248,970	5/2/2021	unknown	unknown
6	County of Santa Clara	Psychiatrist	\$ 227,510	\$ 277,160	-16.8%	\$ 230,597	10/19/2020	11/1/2021	3.00%
7	County of San Diego	Psychiatrist	\$ 178,776	\$ 219,794		\$ 219,794	6/18/2021	unknown	unknown
8	County of Kern	Psychiatrist II, Mental Health	\$ 166,248	\$ 202,956	1.2%	\$ 205,391	4/21/2021	unknown	unknown
9	City and County of San Francisco	N/C							
10	County of Alameda	N/C							
11	County of Contra Costa	N/C							
12	County of Fresno	N/C							
13	County of Sacramento	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 300,248	\$ 264,014
% County of San Diego Above/Below	-36.6%	-20.1%
Number of Matches	7	7

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Psychiatrist - Specialist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Bernardino	Child Psychiatrist	\$ 285,605	\$ 339,706	1.9%	\$ 346,160	3/13/2021	3/26/2022	3.00%
2	County of Riverside	Staff Psychiatrist IV	\$ 258,011	\$ 323,461	1.9%	\$ 329,607	7/1/2021	7/14/2022	2.00%
3	City and County of San Francisco	Senior Psychiatric Physician Specialist	\$ 256,668	\$ 363,216	-17.4%	\$ 300,016	7/1/2021	1/8/2022	.50%
4	County of San Mateo ¹	Child Psychiatrist	\$ 266,672	\$ 315,260	-17.5%	\$ 260,089	5/2/2021	unknown	unknown
5	County of San Diego	Psychiatrist Specialist	\$ 186,930	\$ 229,590		\$ 229,590	6/18/2021	unknown	unknown
6	County of Kern	Psychiatrist III, Mental Health	\$ 172,164	\$ 210,168	1.2%	\$ 212,690	4/21/2021	unknown	unknown
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Los Angeles	N/C							
11	County of Orange	N/C							
12	County of Sacramento	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 323,461	\$ 300,016
% County of San Diego Above/Below	-40.9%	-30.7%
Number of Matches	5	5

N/C - Non Comparator

1 - County of San Mateo: Bottom of range is step 2.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Public Assistance Investigator I									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Alameda	Welfare Investigator I	\$ 74,131	\$ 88,816	-11.4%	\$ 78,691	5/2/2021	5/1/2022	4.00%
2	County of San Mateo	Fraud Investigator I	\$ 72,071	\$ 90,104	-17.5%	\$ 74,336	10/4/2020	unknown	unknown
3	County of Ventura	Welfare Investigator I	\$ 54,645	\$ 73,256	-0.7%	\$ 72,743	4/19/2020	unknown	unknown
4	County of San Diego	Public Assistance Investigator I	\$ 58,531	\$ 71,968		\$ 71,968	6/18/2021	unknown	unknown
5	City and County of San Francisco	N/C							
6	County of Contra Costa	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Los Angeles	N/C							
10	County of Orange	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 88,816	\$ 74,336
% County of San Diego Above/Below	-23.4%	-3.3%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Public Assistance Investigator II									
1	County of Orange	Public Assistance Investigator	\$ 78,000	\$ 105,102	-2.0%	\$ 103,000	7/2/2021	7/1/2022	3.50%
2	City and County of San Francisco	Welfare Fraud Investigator	\$ 102,048	\$ 124,068	-17.4%	\$ 102,480	7/1/2021	1/8/2022	.50%
3	County of Santa Clara	Welfare Fraud Investigator	\$ 96,310	\$ 117,179	-16.8%	\$ 97,493	6/14/2021	6/13/2022	3.00%
4	County of Riverside	Welfare Fraud Investigator-B	\$ 57,715	\$ 90,212	1.9%	\$ 91,926	5/1/2021	5/1/2022	2.00%
5	County of Alameda	Welfare Investigator II	\$ 84,573	\$ 101,296	-11.4%	\$ 89,748	5/2/2021	5/1/2022	4.00%
6	County of San Mateo	Fraud Investigator II	\$ 84,592	\$ 105,787	-17.5%	\$ 87,274	10/4/2020	unknown	unknown
7	County of Fresno	District Attorney Investigator	\$ 63,544	\$ 81,276	4.7%	\$ 85,096	11/4/2019	unknown	unknown
8	County of Ventura	Welfare Investigator II	\$ 58,741	\$ 78,749	-0.7%	\$ 78,198	4/19/2020	unknown	unknown
10	County of Los Angeles	Welfare Fraud Investigator	\$ 57,133	\$ 76,993	-3.8%	\$ 74,067	1/1/2021	unknown	unknown
11	County of Contra Costa ¹	[Social Service Welfare Fraud Investigator/Social Service Welfare Fraud Field Investigator]	\$ 67,273	\$ 81,771	-11.1%	\$ 72,694	7/1/2021	unknown	unknown
12	County of Kern	N/C							
13	County of Sacramento	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 95,754	\$ 88,511
% County of San Diego Above/Below	-23.6%	-14.2%
Number of Matches	10	10

N/C - Non Comparator

1 - County of Contra Costa: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Public Assistance Investigator Supervisor									
1	County of Orange	Supervising Public Assistance Investigator	\$ 91,790	\$ 123,698	-2.0%	\$ 121,224	7/2/2021	7/1/2022	3.50%
2	County of Santa Clara	Supervising Welfare Fraud Investigator	\$ 141,199	\$ 141,199	-16.8%	\$ 117,477	6/28/2021	6/27/2022	3.00%
3	County of Fresno	Supervising District Attorney Investigator	\$ 90,662	\$ 110,188	4.7%	\$ 115,367	4/19/2021	unknown	unknown
4	City and County of San Francisco	Supervising Welfare Fraud Investigator	\$ 110,940	\$ 134,808	-17.4%	\$ 111,351	7/1/2021	1/8/2022	.50%
5	County of Riverside	Supervising Welfare Fraud Investigator-B	\$ 62,614	\$ 100,425	1.9%	\$ 102,333	5/1/2021	5/1/2022	2.00%
6	County of Alameda	Supervising Welfare Investigator	\$ 90,355	\$ 109,803	-11.4%	\$ 97,286	12/27/2020	12/26/2021	3.00%
7	County of San Mateo	Supervisor Fraud Investigation Unit	\$ 92,974	\$ 116,207	-17.5%	\$ 95,871	10/4/2020	unknown	unknown
8	County of Ventura	Supervising Welfare Fraud Investigator	\$ 67,885	\$ 91,004	-0.7%	\$ 90,367	4/19/2020	unknown	unknown
9	County of Contra Costa	Social Services Fraud Prevention Supervisor	\$ 82,982	\$ 100,865	-11.1%	\$ 89,669	7/1/2021	unknown	unknown
11	County of Los Angeles	Supervising Welfare Fraud Investigator	\$ 63,684	\$ 85,810	-3.8%	\$ 82,549	1/1/2021	unknown	unknown
12	County of Kern	Senior District Attorney Welfare Fraud Investigator	\$ 54,672	\$ 66,744	1.2%	\$ 67,545	4/21/2021	unknown	unknown
13	County of Sacramento	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 109,803	\$ 97,286
% County of San Diego Above/Below	-28.7%	-14.1%
Number of Matches	11	11

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Public Assistance Investigator Trainee									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Orange	Public Assistance Investigator Trainee	\$ 51,938	\$ 69,950	-2.0%	\$ 68,551	7/2/2021	7/1/2022	3.50%
2	County of Sacramento	Investigative Assistant	\$ 55,687	\$ 67,672	0.1%	\$ 67,740	6/21/2021	unknown	unknown
3	County of Los Angeles	Welfare Fraud Investigator Trainee	\$ 50,254	\$ 67,719	-3.8%	\$ 65,146	1/1/2021	unknown	unknown
4	County of San Diego	Public Assistance Investigator Trainee	\$ 52,146	\$ 64,043		\$ 64,043	6/18/2021	unknown	unknown
5	City and County of San Francisco	N/C							
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Riverside	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 67,719	\$ 67,740
% County of San Diego Above/Below	-5.7%	-5.8%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Public Defender Investigator I									
1	County of Santa Clara	Public Defender Investigator I	\$ 102,561	\$ 124,667	-16.8%	\$ 103,723	6/14/2021	6/13/2022	3.00%
2	County of Alameda ¹	[Public Defender Investigator I/ Public Defender Investigator II]	\$ 87,214	\$ 107,983	-11.4%	\$ 95,673	12/27/2020	12/26/2021	3.00%
3	County of Los Angeles	Investigator I, Public Defender	\$ 73,286	\$ 98,758	-3.8%	\$ 95,005	1/1/2021	unknown	unknown
4	County of Riverside	The Public Defender Investigator I	\$ 58,735	\$ 91,814	1.9%	\$ 93,559	5/1/2021	5/1/2022	2.00%
5	County of Ventura	Public Defender Investigator I	\$ 75,091	\$ 93,864	-0.7%	\$ 93,207	12/27/2020	12/26/2021	2.00%
6	County of Orange	Defense Investigator I	\$ 67,891	\$ 91,374	-2.0%	\$ 89,547	7/2/2021	7/1/2022	3.50%
7	County of Contra Costa	Public Defender Investigator I	\$ 82,110	\$ 99,805	-11.1%	\$ 88,727	7/1/2021	unknown	unknown
9	County of Kern	Public Defender's Investigator I	\$ 56,328	\$ 68,772	1.2%	\$ 69,597	4/21/2021	unknown	unknown
10	County of Fresno	Defense Investigator I	\$ 49,738	\$ 63,674	4.7%	\$ 66,667	11/2/2020	unknown	unknown
11	City and County of San Francisco	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 93,864	\$ 93,207
% County of San Diego Above/Below	-17.9%	-17.1%
Number of Matches	9	9

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Public Defender Investigator II									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Alameda	Public Defender Investigator III	\$ 122,699	\$ 147,389	-11.4%	\$ 130,586	12/27/2020	12/26/2021	3.00%
2	County of Los Angeles	Investigator II, Public Defender	\$ 91,946	\$ 130,814	-3.8%	\$ 125,843	1/1/2021	unknown	unknown
3	County of Santa Clara	Public Defender Investigator II	\$ 110,425	\$ 134,360	-16.8%	\$ 111,787	6/14/2021	6/13/2022	3.00%
4	County of Orange	Defense Investigator II	\$ 84,178	\$ 113,152	-2.0%	\$ 110,889	7/2/2021	7/1/2022	3.50%
5	County of Riverside	The Public Defender Investigator II	\$ 65,663	\$ 102,655	1.9%	\$ 104,605	5/1/2021	5/1/2022	2.00%
6	County of Contra Costa	Public Defender Investigator II	\$ 93,946	\$ 114,192	-11.1%	\$ 101,516	7/1/2021	unknown	unknown
7	County of Ventura	Public Defender Investigator II	\$ 79,670	\$ 99,599	-0.7%	\$ 98,902	12/27/2020	12/26/2021	2.00%
8	City and County of San Francisco	Public Defenders Investigator	\$ 95,832	\$ 116,484	-17.4%	\$ 96,216	7/1/2021	1/8/2022	.50%
9	County of San Bernardino	Public Defender Investigator	\$ 67,142	\$ 92,373	1.9%	\$ 94,128	7/31/2021	7/30/2022	3.00%
10	County of San Diego	Public Defender Investigator II	\$ 69,742	\$ 85,675		\$ 85,675	6/18/2021	unknown	unknown
11	County of Fresno	Defense Investigator II	\$ 60,190	\$ 76,986	4.7%	\$ 80,604	11/2/2020	unknown	unknown
12	County of Kern	Public Defender's Investigator II	\$ 62,244	\$ 75,984	1.2%	\$ 76,896	4/21/2021	unknown	unknown
13	County of Sacramento	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 113,152	\$ 101,516
% County of San Diego Above/Below	-32.1%	-18.5%
Number of Matches	11	11

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Public Defender Investigator III									
1	County of Alameda	Senior Investigator, Public Defender's Office	\$ 147,410	\$ 178,838	-11.4%	\$ 158,451	12/27/2020	12/26/2021	3.00%
2	County of Santa Clara	Supervising Public Defender Investigator	\$ 137,725	\$ 167,421	-16.8%	\$ 139,294	6/28/2021	6/27/2022	3.00%
3	County of Los Angeles	Investigator III, Public Defender	\$ 102,475	\$ 138,099	-3.8%	\$ 132,852	1/1/2021	unknown	unknown
4	County of Ventura	Supervising Public Defender Investigator	\$ 98,358	\$ 122,960	-0.7%	\$ 122,099	12/27/2020	12/26/2021	2.00%
5	County of Orange	Defense Investigator III	\$ 91,374	\$ 122,741	-2.0%	\$ 120,286	7/2/2021	7/1/2022	3.50%
6	County of Riverside	Supervising Public Defender Investigator	\$ 72,204	\$ 115,866	1.9%	\$ 118,067	5/1/2021	5/1/2022	2.00%
7	City and County of San Francisco	Senior Public Defenders Investigator	\$ 104,100	\$ 126,564	-17.4%	\$ 104,542	7/1/2021	1/8/2022	.50%
8	County of San Bernardino	Supervising Public Defender Investigator	\$ 74,526	\$ 102,502	1.9%	\$ 104,450	7/31/2021	7/30/2022	3.00%
9	County of Fresno	Senior Defense Investigator	\$ 74,386	\$ 95,134	4.7%	\$ 99,605	11/2/2020	unknown	unknown
11	County of Contra Costa	N/C							
12	County of Kern	N/C							
13	County of Sacramento	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 122,960	\$ 120,286
% County of San Diego Above/Below	-30.0%	-27.2%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Public Defender Investigator Tr									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Alameda	Public Defender Investigator I	\$ 78,187	\$ 97,510	-11.4%	\$ 86,394	12/27/2020	12/26/2021	3.00%
2	County of Orange	Defense Investigator Trainee	\$ 57,762	\$ 77,605	-2.0%	\$ 76,053	7/2/2021	7/1/2022	3.50%
3	County of Sacramento	Investigative Assistant	\$ 55,687	\$ 67,672	0.1%	\$ 67,740	6/21/2021	unknown	unknown
4	County of San Diego	Public Defender Investigator Tr	\$ 56,701	\$ 62,504		\$ 62,504	6/18/2021	unknown	unknown
5	County of Ventura	Investigative Assistant II	\$ 38,366	\$ 53,899	-0.7%	\$ 53,521	12/26/2020	12/27/2021	2.00%
6	County of Kern	Public Defender's Investigative Aid	\$ 37,236	\$ 45,456	1.2%	\$ 46,001	4/21/2021	unknown	unknown
7	County of Contra Costa	Public Defender Investigator Assistant	\$ 42,075	\$ 51,142	-11.1%	\$ 45,465	7/1/2021	unknown	unknown
8	City and County of San Francisco	N/C							
9	County of Fresno	N/C							
10	County of Los Angeles	N/C							
11	County of Riverside	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 60,785	\$ 60,631
% County of San Diego Above/Below	2.7%	3.0%
Number of Matches	6	6

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Public Health Microbiologist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Public Health Microbiologist	\$ 106,332	\$ 149,754	-16.8%	\$ 124,595	10/21/2020	10/20/2021	3.00%
2	City and County of San Francisco	Microbiologist I	\$ 86,892	\$ 122,330	-17.4%	\$ 101,045	7/1/2021	1/8/2022	.50%
3	County of Los Angeles	Public Health Microbiologist I	\$ 82,080	\$ 104,772	-3.8%	\$ 100,791	1/1/2021	unknown	unknown
4	County of San Mateo	Public Health Microbiologist II	\$ 94,763	\$ 118,433	-17.5%	\$ 97,707	10/4/2020	unknown	unknown
5	County of Kern	Microbiologist	\$ 75,600	\$ 92,292	1.2%	\$ 93,400	4/21/2021	unknown	unknown
6	County of Riverside	Public Health Microbiologist II	\$ 61,658	\$ 91,310	1.9%	\$ 93,045	5/1/2021	5/1/2022	2.00%
7	County of Ventura	Microbiologist II	\$ 64,066	\$ 89,949	-0.7%	\$ 89,319	12/27/2020	12/26/2021	2.00%
8	County of Contra Costa	Public Health Microbiologist	\$ 80,961	\$ 98,409	-11.1%	\$ 87,486	7/1/2021	unknown	unknown
9	County of Fresno	Public Health Microbiologist	\$ 67,834	\$ 82,446	4.7%	\$ 86,321	10/17/2019	unknown	unknown
10	County of San Diego	Public Health Microbiologist	\$ 69,784	\$ 85,717		\$ 85,717	6/18/2021	unknown	unknown
11	County of Orange	Public Health Microbiologist I	\$ 64,813	\$ 87,381	-2.0%	\$ 85,633	7/2/2021	7/1/2022	3.50%
12	County of San Bernardino	Public Health Microbiologist II	\$ 57,554	\$ 83,096	1.9%	\$ 84,675	3/13/2021	3/26/2022	3.00%
13	County of Sacramento	Public Health Microbiologist	\$ 68,173	\$ 82,852	0.1%	\$ 82,935	6/21/2020	unknown	unknown
14	County of Alameda	Microbiologist	\$ 78,824	\$ 93,561	-11.4%	\$ 82,895	6/27/2021	6/26/2022	3.25%

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 92,292	\$ 89,319
% County of San Diego Above/Below	-7.7%	-4.2%
Number of Matches	13	13

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Public Health Nurse									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Public Health Nurse	\$ 141,516	\$ 185,844	-17.4%	\$ 153,507	7/1/2021	1/8/2022	.50%
2	County of Contra Costa	Public Health Nurse	\$ 131,018	\$ 163,623	-11.1%	\$ 145,461	1/1/2021	unknown	unknown
3	County of Los Angeles	Public Health Nurse	\$ 90,609	\$ 135,631	-3.8%	\$ 130,477	1/1/2021	unknown	unknown
4	County of Santa Clara	Public Health Nurse II	\$ 128,509	\$ 155,780	-16.8%	\$ 129,609	6/14/2021	6/13/2022	3.00%
5	County of San Mateo ¹	Public Health Nurse	\$ 126,441	\$ 149,445	-17.5%	\$ 123,292	2/7/2021	unknown	unknown
6	County of Alameda	Registered Nurse II (PHN Designation)	\$ 109,764	\$ 135,449	-11.4%	\$ 120,008	6/27/2021	6/26/2022	3.25%
7	County of Fresno	Public Health Nurse II	\$ 82,212	\$ 99,918	4.7%	\$ 104,614	11/2/2020	unknown	unknown
8	County of Sacramento	Public Health Nurse II	\$ 85,817	\$ 104,337	0.1%	\$ 104,441	8/2/2020	unknown	unknown
9	County of San Bernardino	Public Health Nurse II	\$ 75,858	\$ 101,982	1.9%	\$ 103,920	8/15/2020	unknown	unknown
10	County of Orange	Public Health Nurse II	\$ 91,541	\$ 104,749	-2.0%	\$ 102,654	7/2/2021	7/1/2022	3.50%
11	County of Ventura	Registered Nurse - Public Health	\$ 83,822	\$ 103,076	-0.7%	\$ 102,354	4/4/2021	4/17/2022	3.25%
12	County of Kern	Public Health Nurse II	\$ 78,684	\$ 96,060	1.2%	\$ 97,213	4/21/2021	unknown	unknown
13	County of Riverside	Registered Nurse II	\$ 76,023	\$ 93,416	1.9%	\$ 95,190	5/1/2021	5/1/2022	2.00%
14	County of San Diego	Public Health Nurse	\$ 77,022	\$ 94,682		\$ 94,682	6/18/2021	unknown	unknown

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 104,749	\$ 104,614
% County of San Diego Above/Below	-10.6%	-10.5%
Number of Matches	13	13

N/C - Non Comparator

1 - County of San Mateo: Bottom of range is step 2.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Public Health Nurse Supervisor									
1	County of Contra Costa ²	[Public Health Nurse/Public Health Nurse Program Manager]	\$ 136,181	\$ 167,717	-11.1%	\$ 149,100	7/1/2021	unknown	unknown
2	County of Los Angeles	Public Health Nursing Supervisor	\$ 101,982	\$ 152,654	-3.8%	\$ 146,853	1/1/2021	unknown	unknown
3	County of Santa Clara	Supervising Public Health Nurse	\$ 131,188	\$ 159,469	-16.8%	\$ 132,679	6/28/2021	6/27/2022	3.00%
4	County of San Mateo	Senior Public Health Nurse	\$ 126,482	\$ 158,098	-17.5%	\$ 130,431	2/7/2021	unknown	unknown
5	County of Alameda ¹	[Registered Nurse III/ Registered Nurse IV (PHN Designation)]	\$ 121,191	\$ 146,744	-11.4%	\$ 130,015	12/27/2020	12/26/2021	3.00%
6	County of Riverside	Assistant Nurse Manager	\$ 75,379	\$ 127,512	1.9%	\$ 129,935	5/1/2021	5/1/2022	2.00%
7	County of Fresno	Supervising Public Health Nurse	\$ 94,822	\$ 121,290	4.7%	\$ 126,991	11/2/2020	unknown	unknown
8	County of Sacramento	Supervising Public Health Nurse	\$ 103,377	\$ 125,677	0.1%	\$ 125,803	6/21/2020	unknown	unknown
9	County of Ventura	Supervising Public Health Nurse	\$ 85,512	\$ 119,729	-0.7%	\$ 118,891	unknown	unknown	unknown
10	County of Orange	Supervising Public Health Nurse I	\$ 86,840	\$ 116,584	-2.0%	\$ 114,252	7/2/2021	7/1/2022	3.50%
11	County of San Bernardino	Supervising Public Health Nurse	\$ 79,706	\$ 109,720	1.9%	\$ 111,805	7/31/2021	7/30/2022	3.00%
13	County of Kern	Supervising Public Health Nurse	\$ 86,940	\$ 106,128	1.2%	\$ 107,402	4/21/2021	unknown	unknown
14	City and County of San Francisco	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 126,595	\$ 128,463
% County of San Diego Above/Below	-13.4%	-15.0%
Number of Matches	12	12

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

2 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Public Health Nutrition Manager									
1	County of Ventura	Supervisor - Public Health Services	\$ 87,467	\$ 122,466	-0.7%	\$ 121,609	unknown	unknown	unknown
2	County of Santa Clara	Nutrition Services Manager	\$ 114,955	\$ 139,732	-16.8%	\$ 116,257	6/28/2021	6/27/2022	3.00%
3	County of Alameda	Health Care Program Administrator II	\$ 95,285	\$ 127,088	-11.4%	\$ 112,600	12/27/2020	unknown	unknown
4	County of Sacramento	Nutrition Program Coordinator	\$ 79,929	\$ 97,155	0.1%	\$ 97,252	6/21/2020	unknown	unknown
5	County of San Mateo	Supervising Public Health Nutritionist	\$ 88,523	\$ 110,695	-17.5%	\$ 91,324	10/4/2020	unknown	unknown
6	County of Riverside	Supervising Nutritionist I	\$ 58,795	\$ 87,060	1.9%	\$ 88,714	5/1/2021	5/1/2022	2.00%
8	County of Contra Costa	Senior Public Health Nutritionist	\$ 73,674	\$ 89,552	-11.1%	\$ 79,611	7/1/2021	unknown	unknown
9	City and County of San Francisco	N/C							
10	County of Fresno	N/C							
11	County of Kern	N/C							
12	County of Los Angeles	N/C							
13	County of Orange	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 110,695	\$ 97,252
% County of San Diego Above/Below	-29.2%	-13.5%
Number of Matches	7	7

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Purchasing Clerk									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Orange	Procurement Buyer Trainee	\$ 44,366	\$ 59,738	-2.0%	\$ 58,543	7/2/2021	7/1/2022	3.50%
2	County of Santa Clara	Buyer Assistant	\$ 55,517	\$ 67,009	-16.8%	\$ 55,752	6/14/2021	6/13/2022	3.00%
3	City and County of San Francisco	Clerk	\$ 55,488	\$ 67,416	-17.4%	\$ 55,686	7/1/2021	1/8/2022	.50%
4	County of San Diego	Purchasing Clerk	\$ 41,226	\$ 50,669		\$ 50,669	6/18/2021	unknown	unknown
5	County of Ventura	Purchasing Technician	\$ 36,119	\$ 50,566	-0.7%	\$ 50,212	12/26/2020	12/27/2021	2.00%
6	County of Fresno	Purchasing Technician I	\$ 38,714	\$ 47,034	4.7%	\$ 49,245	4/19/2021	unknown	unknown
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Kern	N/C							
10	County of Los Angeles	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 59,738	\$ 55,686
% County of San Diego Above/Below	-17.9%	-9.9%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Quality Assurance Specialist (Registered Nurse)									
1	County of Santa Clara	Quality Improvement Coordinator - SCVMC	\$ 153,762	\$ 196,298	-16.8%	\$ 163,320	6/28/2021	6/27/2022	3.00%
2	County of San Mateo ¹	Clinical Nurse	\$ 135,905	\$ 160,635	-17.5%	\$ 132,524	2/7/2021	unknown	unknown
3	County of San Bernardino	Quality Management Nurse	\$ 75,858	\$ 101,982	1.9%	\$ 103,920	8/15/2020	unknown	unknown
5	County of Kern	Quality Management Analyst	\$ 78,684	\$ 96,060	1.2%	\$ 97,213	4/21/2021	unknown	unknown
6	City and County of San Francisco	N/C							
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Los Angeles	N/C							
11	County of Orange	N/C							
12	County of Riverside	N/C							
13	County of Sacramento	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 131,309	\$ 118,222
% County of San Diego Above/Below	-27.8%	-15.1%
Number of Matches	4	4

N/C - Non Comparator

1 - County of San Mateo: Bottom of range is step 2.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Radio Communications System Engineer									
1	County of Riverside	Radio Communications Engineer II	\$ 106,074	\$ 165,782	1.9%	\$ 168,932	5/1/2021	5/1/2022	2.00%
2	County of Los Angeles	Telecommunications Systems Engineer	\$ 117,357	\$ 127,317	-3.8%	\$ 122,479	1/1/2021	unknown	unknown
3	County of Santa Clara	Telecommunications Engineer	\$ 119,529	\$ 145,298	-16.8%	\$ 120,888	6/28/2021	6/27/2022	3.00%
5	County of San Mateo	Systems Engineer	\$ 106,452	\$ 133,055	-17.5%	\$ 109,770	10/4/2020	unknown	unknown
6	County of Fresno	Senior Network Systems Engineer	\$ 79,612	\$ 96,772	4.7%	\$ 101,320	9/21/2020	unknown	unknown
7	County of Sacramento	Radio Communications Systems Technician	\$ 80,346	\$ 97,656	0.1%	\$ 97,754	6/21/2020	unknown	unknown
8	County of Orange	Telecommunications Engineer II	\$ 73,528	\$ 99,050	-2.0%	\$ 97,069	7/2/2021	7/1/2022	3.50%
9	City and County of San Francisco	N/C							
10	County of Alameda	N/C							
11	County of Contra Costa	N/C							
12	County of Kern	N/C							
13	County of San Bernardino	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 127,317	\$ 109,770
% County of San Diego Above/Below	-15.4%	0.5%
Number of Matches	7	7

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Radiologic Technologist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Radiologic Technologist II	\$ 104,100	\$ 153,864	-17.4%	\$ 127,092	7/1/2021	1/8/2022	.50%
2	County of Santa Clara	Diagnostic Imaging Technologist I	\$ 105,533	\$ 127,727	-16.8%	\$ 106,268	6/14/2021	6/13/2022	3.00%
3	County of Contra Costa	Senior Radiologic Technologist	\$ 90,792	\$ 110,358	-11.1%	\$ 98,109	7/1/2021	unknown	unknown
4	County of San Mateo	Radiologic Technologist I	\$ 88,440	\$ 110,550	-17.5%	\$ 91,204	10/4/2020	unknown	unknown
5	County of Los Angeles	Radiologic Technologist	\$ 70,454	\$ 89,930	-3.8%	\$ 86,513	1/1/2021	unknown	unknown
6	County of Riverside	Radiologic Technologist II	\$ 55,771	\$ 82,601	1.9%	\$ 84,170	5/1/2021	5/1/2022	2.00%
7	County of Orange	Radiologic Technologist	\$ 62,712	\$ 84,469	-2.0%	\$ 82,779	7/2/2021	7/1/2022	3.50%
8	County of San Bernardino	Radiologic Technologist II	\$ 58,074	\$ 79,789	1.9%	\$ 81,305	7/31/2021	7/30/2022	3.00%
9	County of Ventura	Radiologic Technologist	\$ 50,293	\$ 75,056	-0.7%	\$ 74,530	12/26/2020	12/27/2021	2.00%
10	County of Sacramento	Radiologic Technologist	\$ 55,186	\$ 67,087	0.1%	\$ 67,154	6/21/2020	unknown	unknown
11	County of Kern	Radiologic Technologist II	\$ 49,728	\$ 60,828	1.2%	\$ 61,558	4/21/2021	unknown	unknown
12	County of San Diego	Radiologic Technologist	\$ 44,741	\$ 55,078		\$ 55,078	6/18/2021	unknown	unknown
13	County of Alameda	N/C							
14	County of Fresno	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 84,469	\$ 84,170
% County of San Diego Above/Below	-53.4%	-52.8%
Number of Matches	11	11

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Radiologist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Senior Physician Specialist	\$ 212,576	\$ 293,826	-17.4%	\$ 242,700	7/1/2021	1/8/2022	.50%
2	County of Riverside	Physician IV	\$ 190,995	\$ 228,680	1.9%	\$ 233,024	5/1/2021	5/1/2022	2.00%
3	County of San Diego	Radiologist	\$ 138,965	\$ 170,851		\$ 170,851	6/18/2021	unknown	unknown
4	County of Alameda	N/C							
5	County of Contra Costa	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Los Angeles	N/C							
9	County of Orange	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 261,253	\$ 237,862
% County of San Diego Above/Below	-52.9%	-39.2%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Recordable Documents Specialist I									
1	County of Alameda	Clerk-Recorder's Specialist III	\$ 60,039	\$ 71,052	-11.4%	\$ 62,952	6/27/2021	6/26/2022	3.25%
3	County of Riverside	Assessor-Clerk-Recorder Technician I	\$ 33,641	\$ 52,569	1.9%	\$ 53,568	5/1/2021	5/1/2022	2.00%
4	County of Orange	Recordable Documents Examiner Trainee	\$ 38,688	\$ 52,166	-2.0%	\$ 51,123	7/2/2021	7/1/2022	3.50%
5	County of San Mateo	Assessor / Recorder Technician I	\$ 48,297	\$ 60,381	-17.5%	\$ 49,815	10/4/2020	unknown	unknown
6	County of Santa Clara	Clerk-Recorder Office Specialist I	\$ 48,695	\$ 58,612	-16.8%	\$ 48,765	6/14/2021	6/13/2022	3.00%
7	County of San Bernardino	Legal Document Classifier I	\$ 33,779	\$ 46,363	1.9%	\$ 47,244	7/31/2021	7/30/2022	3.00%
8	County of Sacramento	Office Specialist I	\$ 38,190	\$ 46,416	0.1%	\$ 46,462	6/21/2020	unknown	unknown
9	County of Ventura	Records Technician I	\$ 31,271	\$ 43,689	-0.7%	\$ 43,383	12/27/2020	12/26/2021	2.00%
10	County of Kern	Legal Process Technician I	\$ 30,348	\$ 37,056	1.2%	\$ 37,501	4/21/2021	unknown	unknown
11	City and County of San Francisco	N/C							
12	County of Contra Costa	N/C							
13	County of Fresno	N/C							
14	County of Los Angeles	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 52,166	\$ 48,765
% County of San Diego Above/Below	7.5%	13.6%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Recordable Documents Specialist II									
1	City and County of San Francisco	Assessor-Recorder Office Specialist	\$ 66,144	\$ 80,392	-17.4%	\$ 66,404	7/1/2021	1/8/2022	.50%
3	County of Contra Costa	Recordable Documents Technician	\$ 56,169	\$ 68,273	-11.1%	\$ 60,695	7/1/2021	unknown	unknown
4	County of Riverside	Assessor-Clerk-Recorder Technician II	\$ 37,788	\$ 59,021	1.9%	\$ 60,142	5/1/2021	5/1/2022	2.00%
5	County of Orange	Recordable Documents Examiner	\$ 44,366	\$ 59,738	-2.0%	\$ 58,543	7/2/2021	7/1/2022	3.50%
6	County of Alameda ¹	[Clerk-Recorder's Specialist I/ Clerk-Recorder's Specialist II]	\$ 51,675	\$ 59,690	-11.4%	\$ 52,885	6/27/2021	6/26/2022	3.25%
7	County of Santa Clara	Clerk-Recorder Office Specialist II	\$ 52,466	\$ 63,240	-16.8%	\$ 52,616	6/14/2021	6/13/2022	3.00%
8	County of San Mateo	Assessor / Recorder Technician II	\$ 50,876	\$ 63,605	-17.5%	\$ 52,474	10/4/2020	unknown	unknown
9	County of Sacramento	Office Specialist II	\$ 42,908	\$ 52,158	0.1%	\$ 52,210	6/21/2020	unknown	unknown
10	County of San Bernardino	Legal Document Classifier II	\$ 36,754	\$ 50,482	1.9%	\$ 51,441	7/31/2021	7/30/2022	3.00%
11	County of Ventura	Records Technician II	\$ 35,249	\$ 49,293	-0.7%	\$ 48,948	12/27/2020	12/26/2021	2.00%
12	County of Fresno	Property Recording Clerk	\$ 33,852	\$ 43,290	4.7%	\$ 45,325	11/2/2020	unknown	unknown
13	County of Kern	Legal Process Technician II	\$ 33,528	\$ 40,932	1.2%	\$ 41,423	4/21/2021	unknown	unknown
14	County of Los Angeles	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 59,355	\$ 52,545
% County of San Diego Above/Below	8.5%	19.0%
Number of Matches	12	12

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Recordable Documents Specialist III									
1	County of Santa Clara	Clerk-Recorder Supervisor	\$ 85,756	\$ 104,247	-16.8%	\$ 86,734	6/28/2021	6/27/2022	3.00%
2	City and County of San Francisco	Assessor-Recorder Senior Office Specialist	\$ 73,060	\$ 93,210	-17.4%	\$ 76,991	7/1/2021	1/8/2022	.50%
4	County of Alameda	Clerk-Recorder's Supervisor I	\$ 67,475	\$ 81,910	-11.4%	\$ 72,573	12/27/2020	12/26/2021	3.00%
5	County of San Mateo	Assessor / Recorder Support Services Supervisor	\$ 69,263	\$ 86,568	-17.5%	\$ 71,419	10/4/2020	unknown	unknown
6	County of Riverside	Supervising Assessor-Clerk-Recorder Technician	\$ 43,293	\$ 69,366	1.9%	\$ 70,683	5/1/2021	5/1/2022	2.00%
7	County of Ventura	Clerk and Recorder Program Supervisor II	\$ 49,106	\$ 67,926	-0.7%	\$ 67,450	unknown	unknown	unknown
8	County of Orange	Supervising Recordable Documents Examiner	\$ 50,794	\$ 68,432	-2.0%	\$ 67,063	7/2/2021	7/1/2022	3.50%
9	County of San Bernardino ¹	[Records Technician Supervisor I/ Records Technician Supervisor II]	\$ 47,382	\$ 65,094	1.9%	\$ 66,330	7/31/2021	7/30/2022	3.00%
10	County of Sacramento	Clerk/Recorder Supervisor	\$ 51,908	\$ 63,078	0.1%	\$ 63,141	6/21/2020	unknown	unknown
11	County of Kern	Supervising Legal Process Technician	\$ 42,600	\$ 52,008	1.2%	\$ 52,632	4/21/2021	unknown	unknown
12	County of Contra Costa	N/C							
13	County of Fresno	N/C							
14	County of Los Angeles	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 68,899	\$ 69,067
% County of San Diego Above/Below	8.3%	8.0%
Number of Matches	10	10

N/C - Non Comparator

1 - County of San Bernardino: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Records Clerk									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Assessor-Recorder Office Assistant	\$ 59,514	\$ 72,332	-17.4%	\$ 59,746	7/1/2021	1/8/2022	.50%
2	County of Los Angeles	Intermediate Clerk	\$ 34,788	\$ 47,962	-3.8%	\$ 46,139	1/1/2021	unknown	unknown
3	County of San Diego	Records Clerk	\$ 35,214	\$ 43,202		\$ 43,202	6/18/2021	unknown	unknown
4	County of Alameda	N/C							
5	County of Contra Costa	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 60,147	\$ 52,943
% County of San Diego Above/Below	-39.2%	-22.5%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Records Management Coordinator									
1	County of Riverside	Assistant Medical Records Manager	\$ 60,007	\$ 90,839	1.9%	\$ 92,565	7/1/2021	7/14/2022	2.00%
2	County of Fresno	Medical Records Coordinator	\$ 62,478	\$ 75,920	4.7%	\$ 79,488	4/19/2021	unknown	unknown
3	County of Orange	Sheriff's Records Supervisor	\$ 50,918	\$ 68,162	-2.0%	\$ 66,798	7/2/2021	7/1/2022	3.50%
5	County of San Bernardino	Records Management Coordinator	\$ 35,797	\$ 49,296	1.9%	\$ 50,233	7/31/2021	7/30/2022	3.00%
6	City and County of San Francisco	N/C							
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Kern	N/C							
10	County of Los Angeles	N/C							
11	County of Sacramento	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 72,041	\$ 73,143
% County of San Diego Above/Below	-29.8%	-31.8%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Recreation Program Coordinator									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Recreation Coordinator	\$ 64,668	\$ 78,648	-17.4%	\$ 64,963	7/1/2021	1/8/2022	.50%
2	County of San Diego	Recreation Program Coordinator	\$ 46,197	\$ 56,742		\$ 56,742	6/18/2021	unknown	unknown
3	County of Riverside	Recreation Coordinator	\$ 34,925	\$ 54,530	1.9%	\$ 55,566	5/1/2021	5/1/2022	2.00%
4	County of San Bernardino	Recreation Coordinator	\$ 36,754	\$ 50,482	1.9%	\$ 51,441	7/31/2021	7/30/2022	3.00%
5	County of Kern	Elder Life Activity Coordinator	\$ 37,992	\$ 46,368	1.2%	\$ 46,924	4/21/2021	unknown	unknown
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Fresno	N/C							
9	County of Los Angeles	N/C							
10	County of Orange	N/C							
11	County of Sacramento	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 52,506	\$ 53,503
% County of San Diego Above/Below	7.5%	5.7%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Recreation Therapy Aide									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Therapy Technician	\$ 57,712	\$ 69,630	-16.8%	\$ 57,932	6/14/2021	6/13/2022	3.00%
2	County of San Mateo	Therapy Aide	\$ 54,266	\$ 67,827	-17.5%	\$ 55,958	10/4/2020	unknown	unknown
3	County of Los Angeles	Recreation Therapy Aide	\$ 38,995	\$ 52,405	-3.8%	\$ 50,414	1/1/2021	unknown	unknown
4	County of San Diego	Recreation Therapy Aide	\$ 36,462	\$ 44,803		\$ 44,803	6/18/2021	unknown	unknown
5	City and County of San Francisco	N/C							
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Orange	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 67,827	\$ 55,958
% County of San Diego Above/Below	-51.4%	-24.9%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Recreation Therapy Supervisor									
1	County of Los Angeles	Recreation Therapy Supervisor	\$ 74,750	\$ 100,726	-3.8%	\$ 96,898	1/1/2021	unknown	unknown
2	County of Santa Clara	Recreation Therapist III	\$ 93,902	\$ 113,687	-16.8%	\$ 94,587	6/14/2021	6/13/2022	3.00%
3	County of San Mateo	Supervising Creative Arts Therapist	\$ 87,275	\$ 109,094	-17.5%	\$ 90,002	10/4/2020	unknown	unknown
5	County of Sacramento	Recreation Supervisor - Therapeutic	\$ 59,237	\$ 71,994	0.1%	\$ 72,066	6/21/2020	unknown	unknown
6	City and County of San Francisco	N/C							
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of Orange	N/C							
12	County of Riverside	N/C							
13	County of San Bernardino	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 104,910	\$ 92,295
% County of San Diego Above/Below	-26.7%	-11.5%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Recreational Therapist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Los Angeles	Recreation Therapist II	\$ 69,931	\$ 94,243	-3.8%	\$ 90,661	1/1/2021	unknown	unknown
2	County of Santa Clara	Recreation Therapist II	\$ 83,364	\$ 100,859	-16.8%	\$ 83,915	6/14/2021	6/13/2022	3.00%
3	County of Sacramento	Activities Therapist	\$ 69,927	\$ 80,952	0.1%	\$ 81,033	6/21/2020	unknown	unknown
4	County of San Mateo	Creative Arts Therapist	\$ 72,653	\$ 90,853	-17.5%	\$ 74,953	10/4/2020	unknown	unknown
5	County of Riverside	Recreation Therapist	\$ 46,956	\$ 69,457	1.9%	\$ 70,777	5/1/2021	5/1/2022	2.00%
6	County of San Diego	Recreational Therapist	\$ 56,014	\$ 68,786		\$ 68,786	6/18/2021	unknown	unknown
7	County of Contra Costa	Recreation Therapist	\$ 58,961	\$ 71,667	-11.1%	\$ 63,712	7/1/2021	unknown	unknown
8	County of Kern	Recreational Therapist	\$ 39,732	\$ 48,504	1.2%	\$ 49,086	4/21/2021	unknown	unknown
9	City and County of San Francisco	N/C							
10	County of Alameda	N/C							
11	County of Fresno	N/C							
12	County of Orange	N/C							
13	County of San Bernardino	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 80,952	\$ 74,953
% County of San Diego Above/Below	-17.7%	-9.0%
Number of Matches	7	7

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Recycling Specialist I									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Mateo	Resource Conservation Specialist I	\$ 76,418	\$ 95,574	-17.5%	\$ 78,849	10/4/2020	unknown	unknown
2	County of San Diego	Recycling Specialist I	\$ 54,517	\$ 67,018		\$ 67,018	6/18/2021	unknown	unknown
3	County of Riverside	Recycling Specialist I	\$ 42,796	\$ 63,050	1.9%	\$ 64,248	5/1/2021	5/1/2022	2.00%
4	County of Contra Costa	Resource Recovery Assistant	\$ 47,373	\$ 57,582	-11.1%	\$ 51,191	7/1/2021	unknown	Unknown
5	City and County of San Francisco	N/C							
6	County of Alameda	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Los Angeles	N/C							
10	County of Orange	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 63,050	\$ 64,248
% County of San Diego Above/Below	5.9%	4.1%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Recycling Specialist II									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Mateo	Resource Conservation Specialist II	\$ 84,134	\$ 105,142	-17.5%	\$ 86,742	10/4/2020	unknown	unknown
2	County of Alameda	Sustainability Specialist	\$ 66,290	\$ 91,624	-11.4%	\$ 81,179	12/27/2020	unknown	unknown
3	County of San Diego	Recycling Specialist II	\$ 64,709	\$ 79,560		\$ 79,560	6/18/2021	unknown	unknown
4	County of San Bernardino	Recycling Specialist	\$ 55,619	\$ 76,461	1.9%	\$ 77,914	7/31/2021	7/30/2022	3.00%
5	County of Riverside	Recycling Specialist II	\$ 47,459	\$ 69,901	1.9%	\$ 71,229	5/1/2021	5/1/2022	2.00%
6	County of Contra Costa	Resource Recovery Specialist	\$ 57,576	\$ 69,984	-11.1%	\$ 62,216	7/1/2021	unknown	unknown
7	City and County of San Francisco	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Los Angeles	N/C							
11	County of Orange	N/C							
12	County of Sacramento	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 76,461	\$ 77,914
% County of San Diego Above/Below	3.9%	2.1%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Registered Veterinary Technician									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Orange	Registered Veterinary Technician	\$ 53,622	\$ 72,280	-2.0%	\$ 70,834	7/2/2021	7/1/2022	3.50%
2	County of Los Angeles	Registered Veterinary Technician	\$ 53,850	\$ 72,571	-3.8%	\$ 69,813	1/1/2021	unknown	unknown
3	County of Ventura	Veterinary Technician - Registered	\$ 49,846	\$ 69,982	-0.7%	\$ 69,492	12/26/2020	12/27/2021	2.00%
4	County of Sacramento	Registered Veterinary Technician	\$ 55,040	\$ 66,900	0.1%	\$ 66,967	6/21/2020	unknown	unknown
5	County of Riverside	Registered Veterinary Technician	\$ 41,987	\$ 65,616	1.9%	\$ 66,863	5/1/2021	5/1/2022	2.00%
6	County of Contra Costa	Registered Veterinary Technician	\$ 49,083	\$ 69,065	-11.1%	\$ 61,399	7/1/2021	unknown	unknown
7	County of San Bernardino	Registered Veterinary Technician	\$ 41,246	\$ 56,722	1.9%	\$ 57,799	7/31/2021	7/30/2022	3.00%
8	County of San Diego	Registered Veterinary Technician	\$ 46,717	\$ 57,387		\$ 57,387	6/18/2021	unknown	unknown
9	County of Santa Clara	Registered Veterinary Technician	\$ 55,763	\$ 67,781	-16.8%	\$ 56,394	6/14/2021	6/13/2022	3.00%
10	County of Kern	Registered Veterinary Technician	\$ 36,324	\$ 44,340	1.2%	\$ 44,872	4/21/2021	unknown	unknown
11	City and County of San Francisco	N/C							
12	County of Alameda	N/C							
13	County of Fresno	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 67,781	\$ 66,863
% County of San Diego Above/Below	-18.1%	-16.5%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Residential Care Worker I									
1	County of Santa Clara	Associate Children's Counselor	\$ 56,913	\$ 68,711	-16.8%	\$ 57,167	6/14/2021	6/13/2022	3.00%
3	County of Kern	Group Counselor I/Dept Human Services	\$ 35,076	\$ 42,816	1.2%	\$ 43,330	4/21/2021	unknown	unknown
4	County of Ventura	Family Services Residential Worker I	\$ 29,140	\$ 33,868	-0.7%	\$ 33,631	12/26/2020	12/27/2021	2.00%
5	County of Fresno	Behavioral Health Worker I	\$ 29,120	\$ 31,928	4.7%	\$ 33,429	11/2/2020	unknown	unknown
6	City and County of San Francisco	N/C							
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Los Angeles	N/C							
10	County of Orange	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 38,342	\$ 38,480
% County of San Diego Above/Below	12.6%	12.3%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Residential Care Worker II									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Children's Counselor	\$ 64,977	\$ 78,501	-16.8%	\$ 65,313	6/14/2021	6/13/2022	3.00%
2	County of Kern	Group Counselor II/Dept Human Services	\$ 38,748	\$ 47,304	1.2%	\$ 47,872	4/21/2021	unknown	unknown
3	County of San Diego	Residential Care Worker II	\$ 38,397	\$ 47,258		\$ 47,258	6/18/2021	unknown	unknown
4	County of Ventura	Family Services Residential Worker II	\$ 29,813	\$ 41,950	-0.7%	\$ 41,656	12/26/2020	12/27/2021	2.00%
5	County of Fresno	Behavioral Health Worker II	\$ 29,770	\$ 35,802	4.7%	\$ 37,485	11/2/2020	unknown	unknown
6	City and County of San Francisco	N/C							
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Los Angeles	N/C							
10	County of Orange	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 44,627	\$ 44,764
% County of San Diego Above/Below	5.6%	5.3%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Residential Care Worker Supervisor									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Diego	Residential Care Worker Supervisor	\$ 45,947	\$ 56,555		\$ 56,555	6/18/2021	unknown	unknown
2	County of Kern	Group Counselor III/Dept Human Services	\$ 43,464	\$ 53,064	1.2%	\$ 53,701	4/21/2021	unknown	unknown
3	City and County of San Francisco	N/C							
4	County of Alameda	N/C							
5	County of Contra Costa	N/C							
6	County of Fresno	N/C							
7	County of Los Angeles	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 53,064	\$ 53,701
% County of San Diego Above/Below	6.2%	5.0%
Number of Matches	1	1

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Residential Care Worker Trainee									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Diego	Residential Care Worker Trainee	\$ 32,427	\$ 39,790		\$ 39,790	6/18/2021	unknown	unknown
2	City and County of San Francisco	N/C							
3	County of Alameda	N/C							
4	County of Contra Costa	N/C							
5	County of Fresno	N/C							
6	County of Kern	N/C							
7	County of Los Angeles	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	N/A	N/A
% County of San Diego Above/Below	N/A	N/A
Number of Matches	0	0

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Residential Childcare Specialist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Senior Children's Counselor	\$ 71,230	\$ 86,091	-16.8%	\$ 71,628	6/14/2021	6/13/2022	3.00%
2	County of San Diego	Residential Childcare Specialist	\$ 41,579	\$ 51,106		\$ 51,106	6/18/2021	unknown	unknown
3	City and County of San Francisco	N/C							
4	County of Alameda	N/C							
5	County of Contra Costa	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Los Angeles	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 86,091	\$ 71,628
% County of San Diego Above/Below	-68.5%	-40.2%
Number of Matches	1	1

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Revenue & Recovery Officer									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Collections Officer	\$ 71,474	\$ 86,892	-17.4%	\$ 71,773	7/1/2021	1/8/2022	.50%
2	County of Alameda	Collection Enforcement Deputy II	\$ 63,083	\$ 76,733	-11.4%	\$ 67,985	6/27/2021	6/26/2022	3.25%
3	County of San Mateo	Revenue Collector II	\$ 65,768	\$ 82,179	-17.5%	\$ 67,798	10/4/2020	unknown	unknown
4	County of Santa Clara	Revenue Collections Officer	\$ 65,859	\$ 79,535	-16.8%	\$ 66,173	6/14/2021	6/13/2022	3.00%
5	County of Contra Costa	Collection Enforcement Officer II	\$ 59,125	\$ 71,867	-11.1%	\$ 63,890	7/1/2021	unknown	unknown
6	County of San Diego	Revenue & Recovery Officer	\$ 46,446	\$ 62,878		\$ 62,878	6/18/2021	unknown	unknown
7	County of San Bernardino	Collections Officer I	\$ 43,597	\$ 59,925	1.9%	\$ 61,063	7/31/2021	7/30/2022	3.00%
8	County of Orange	Collections Officer I	\$ 44,366	\$ 59,738	-2.0%	\$ 58,543	7/2/2021	7/1/2022	3.50%
9	County of Los Angeles	Delinquent Accounts Investigator	\$ 44,138	\$ 59,428	-3.8%	\$ 57,170	1/1/2021	unknown	unknown
10	County of Sacramento	Collection Services Agent II	\$ 46,354	\$ 56,355	0.1%	\$ 56,411	6/21/2020	unknown	unknown
11	County of Ventura	Collections Officer II	\$ 36,684	\$ 51,334	-0.7%	\$ 50,975	12/27/2020	12/26/2021	2.00%
12	County of Fresno	Collections Representative II	\$ 34,320	\$ 43,914	4.7%	\$ 45,978	11/2/2020	unknown	unknown
13	County of Kern	N/C							
14	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 59,925	\$ 61,063
% County of San Diego Above/Below	4.7%	2.9%
Number of Matches	11	11

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Revenue & Recovery Officer Trainee									
1	County of Alameda	Collection Enforcement Deputy I	\$ 56,024	\$ 66,339	-11.4%	\$ 58,776	6/27/2021	6/26/2022	3.25%
2	County of San Mateo	Revenue Collector I	\$ 53,164	\$ 66,476	-17.5%	\$ 54,842	10/4/2020	unknown	unknown
3	County of Sacramento	Collection Services Agent I	\$ 43,639	\$ 53,035	0.1%	\$ 53,088	6/21/2020	unknown	unknown
4	County of Orange	Collection Officer Trainee	\$ 39,790	\$ 53,622	-2.0%	\$ 52,550	7/2/2021	7/1/2022	3.50%
5	County of Contra Costa	Collection Enforcement Officer I	\$ 45,076	\$ 54,791	-11.1%	\$ 48,709	7/1/2021	unknown	unknown
6	County of San Bernardino	Collections Officer Trainee	\$ 34,133	\$ 45,802	1.9%	\$ 46,672	7/31/2021	7/30/2022	3.00%
8	County of Ventura	Collections Officer I	\$ 32,674	\$ 45,657	-0.7%	\$ 45,337	12/27/2020	12/26/2021	2.00%
9	County of Fresno	Collections Representative I	\$ 30,290	\$ 38,740	4.7%	\$ 40,561	11/2/2020	unknown	unknown
10	City and County of San Francisco	N/C							
11	County of Kern	N/C							
12	County of Los Angeles	N/C							
13	County of Riverside	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 53,329	\$ 50,629
% County of San Diego Above/Below	-16.5%	-10.6%
Number of Matches	8	8

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Road Crew Supervisor									
1	City and County of San Francisco	Street Repair Supervisor II	\$ 103,896	\$ 126,308	-17.4%	\$ 104,330	7/1/2021	1/8/2022	.50%
2	County of Los Angeles	Road Maintenance Supervisor	\$ 79,496	\$ 101,469	-3.8%	\$ 97,613	1/1/2021	unknown	unknown
3	County of San Mateo	Road Construction Supervisor	\$ 93,681	\$ 117,102	-17.5%	\$ 96,609	2/7/2021	2/6/2022	2-4%
4	County of Alameda	Field Maintenance Supervisor	\$ 108,950	\$ 108,950	-11.4%	\$ 96,530	12/27/2020	12/26/2021	3.00%
5	County of Orange	Public Works Maintenance Supervisor	\$ 70,325	\$ 94,765	-2.0%	\$ 92,870	7/2/2021	7/1/2022	3.50%
6	County of Sacramento	Highway Maintenance Supervisor	\$ 73,790	\$ 89,721	0.1%	\$ 89,811	6/21/2020	unknown	unknown
7	County of Santa Clara	Road Maintenance Supervisor	\$ 87,759	\$ 106,188	-16.8%	\$ 88,349	6/14/2021	6/13/2022	3.00%
8	County of Contra Costa	Public Works Maintenance Supervisor	\$ 82,078	\$ 95,186	-11.1%	\$ 84,620	7/1/2021	unknown	Unknown
9	County of Riverside	Assistant District Road Maintenance Supervisor	\$ 53,109	\$ 82,898	1.9%	\$ 84,473	5/1/2021	5/1/2022	2.00%
11	County of Ventura	Supervisor - Public Works Maintenance	\$ 58,163	\$ 81,489	-0.7%	\$ 80,918	12/26/2020	12/27/2021	2.00%
12	County of San Bernardino	Maintenance and Construction Supervisor II	\$ 57,096	\$ 78,416	1.9%	\$ 79,906	7/31/2021	7/30/2022	3.00%
13	County of Fresno	Road Maintenance Supervisor	\$ 58,604	\$ 71,214	4.7%	\$ 74,561	4/19/2021	unknown	unknown
14	County of Kern	Supervising Road Maintenance Worker I	\$ 43,680	\$ 53,328	1.2%	\$ 53,968	4/21/2021	unknown	unknown

Summary Results			Top Annual	Adjusted Top Annual
Median of Comparators			\$ 94,765	\$ 88,349
% County of San Diego Above/Below			-16.6%	-8.7%
Number of Matches			13	13

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sanitation Regional Supervisor									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Mateo	Wastewater Collection Supervisor	\$ 100,483	\$ 125,567	-17.5%	\$ 103,593	2/7/2021	2/6/2022	2-4%
2	County of Fresno	Supervising Water/Wastewater Specialist	\$ 81,042	\$ 98,514	4.7%	\$ 103,144	4/19/2021	unknown	unknown
3	County of San Diego	Sanitation Regional Supervisor	\$ 74,006	\$ 90,979		\$ 90,979	6/18/2021	unknown	unknown
4	County of San Bernardino	Maintenance and Construction Supervisor II	\$ 57,096	\$ 78,416	1.9%	\$ 79,906	7/31/2021	7/30/2022	3.00%
5	County of Orange	Supervising Waste Inspector	\$ 48,797	\$ 65,354	-2.0%	\$ 64,046	7/2/2021	7/1/2022	3.50%
6	County of Kern	Sewer Collection Systems Supervisor	\$ 45,684	\$ 55,776	1.2%	\$ 56,445	4/21/2021	unknown	unknown
7	City and County of San Francisco	N/C							
8	County of Alameda	N/C							
9	County of Contra Costa	N/C							
10	County of Los Angeles	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 78,416	\$ 79,906
% County of San Diego Above/Below	13.8%	12.2%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Section Chief, Revenue & Recovery									
1	County of Contra Costa ¹	[Collection Enforcement Supervisor I/Auditor - Controller Division Manager]	\$ 100,085	\$ 121,654	-11.1%	\$ 108,151	7/1/2021	unknown	unknown
2	County of San Bernardino	Chief Collections Supervisor	\$ 67,579	\$ 93,122	1.9%	\$ 94,891	7/31/2021	7/30/2022	3.00%
3	County of Santa Clara	Supervising Revenue Collections Officer	\$ 93,186	\$ 113,314	-16.8%	\$ 94,277	6/28/2021	6/27/2022	3.00%
4	County of Alameda	Collection Supervisor II	\$ 87,277	\$ 106,163	-11.4%	\$ 94,061	12/27/2020	12/26/2021	3.00%
6	County of San Mateo	Revenue Collection Supervisor	\$ 84,093	\$ 105,080	-17.5%	\$ 86,691	10/4/2020	unknown	unknown
7	City and County of San Francisco	Collection Supervisor	\$ 82,810	\$ 100,646	-17.4%	\$ 83,134	7/1/2021	1/8/2022	.50%
8	County of Orange	Supervising, Collections Officer	\$ 55,078	\$ 74,235	-2.0%	\$ 72,751	7/2/2021	7/1/2022	3.50%
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of Los Angeles	N/C							
12	County of Riverside	N/C							
13	County of Sacramento	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 105,080	\$ 94,061
% County of San Diego Above/Below	-17.1%	-4.8%
Number of Matches	7	7

N/C - Non Comparator

1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Account Clerk									
1	County of San Mateo	Fiscal Office Services Supervisor	\$ 69,263	\$ 86,568	-17.5%	\$ 71,419	10/4/2020	unknown	unknown
2	County of Contra Costa	Account Clerk Supervisor	\$ 61,124	\$ 78,057	-11.1%	\$ 69,393	7/1/2021	unknown	unknown
3	City and County of San Francisco	Senior Account Clerk	\$ 68,952	\$ 83,746	-17.4%	\$ 69,174	7/1/2021	1/8/2022	.50%
4	County of Ventura ¹	[Senior Accounting Assistant/ Supervising Accounting Technician]	\$ 47,844	\$ 66,982	-0.7%	\$ 66,514	12/26/2020	12/27/2021	2.00%
5	County of Riverside	Senior Accounting Assistant	\$ 39,852	\$ 62,232	1.9%	\$ 63,414	5/1/2021	5/1/2022	2.00%
6	County of Fresno	Supervising Account Clerk	\$ 44,148	\$ 56,472	4.7%	\$ 59,126	11/2/2020	unknown	unknown
7	County of Santa Clara	Senior Account Clerk	\$ 57,267	\$ 69,147	-16.8%	\$ 57,531	6/14/2021	6/13/2022	3.00%
8	County of Orange	Senior Accounting Assistant	\$ 42,598	\$ 56,867	-2.0%	\$ 55,730	7/2/2021	7/1/2022	3.50%
9	County of San Bernardino	Supervising Office Assistant	\$ 38,584	\$ 53,082	1.9%	\$ 54,090	7/31/2021	7/30/2022	3.00%
10	County of Sacramento	Senior Account Clerk	\$ 44,433	\$ 53,996	0.1%	\$ 54,050	6/21/2020	unknown	unknown
12	County of Kern	Fiscal Support Specialist	\$ 39,144	\$ 47,784	1.2%	\$ 48,357	4/21/2021	unknown	unknown
13	County of Alameda	N/C							
14	County of Los Angeles	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 62,232	\$ 59,126
% County of San Diego Above/Below	-24.4%	-18.2%
Number of Matches	11	11

N/C - Non Comparator

1 - County of Ventura: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Accountant									
1	County of Santa Clara	Senior Accountant	\$ 105,776	\$ 128,577	-16.8%	\$ 106,976	6/28/2021	6/27/2022	3.00%
2	City and County of San Francisco	Accountant III	\$ 100,646	\$ 122,330	-17.4%	\$ 101,045	7/1/2021	1/8/2022	.50%
3	County of Sacramento	Senior Accountant	\$ 79,114	\$ 96,152	0.1%	\$ 96,248	6/21/2020	unknown	unknown
4	County of Orange	Senior Accountant/Auditor	\$ 71,698	\$ 96,512	-2.0%	\$ 94,582	7/2/2021	7/1/2022	3.50%
6	County of Ventura	Senior Accountant	\$ 65,038	\$ 91,053	-0.7%	\$ 90,416	12/27/2020	12/26/2021	2.00%
7	County of Contra Costa ¹	[Accountant III/Supervising Accountant]	\$ 82,600	\$ 100,401	-11.1%	\$ 89,256	7/1/2021	unknown	unknown
8	County of San Mateo ²	[Accountant II/Senior Accountant]	\$ 84,519	\$ 105,662	-17.5%	\$ 87,171	10/4/2020	unknown	unknown
9	County of San Bernardino	Accountant III	\$ 61,381	\$ 84,365	1.9%	\$ 85,968	7/31/2021	7/30/2022	3.00%
10	County of Riverside	Senior Accountant	\$ 53,292	\$ 78,876	1.9%	\$ 80,375	5/1/2021	5/1/2022	2.00%
11	County of Alameda	Senior Accountant	\$ 75,171	\$ 90,168	-11.4%	\$ 79,889	12/27/2020	12/26/2021	3.00%
12	County of Los Angeles	Accountant III	\$ 61,218	\$ 82,490	-3.8%	\$ 79,356	1/1/2021	unknown	unknown
13	County of Fresno	Senior Accountant	\$ 62,140	\$ 75,556	4.7%	\$ 79,107	10/17/2019	unknown	unknown
14	County of Kern	Accountant III	\$ 58,620	\$ 71,568	1.2%	\$ 72,427	4/21/2021	unknown	unknown

Summary Results			Top Annual	Adjusted Top Annual
Median of Comparators			\$ 91,053	\$ 87,171
% County of San Diego Above/Below			0.3%	4.6%
Number of Matches			13	13

N/C - Non Comparator

1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

2 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Admissions Clerk									
1	County of Riverside	Senior Admissions and Collections Clerk	\$ 38,616	\$ 60,300	1.9%	\$ 61,446	5/1/2021	5/1/2022	2.00%
2	County of San Bernardino	Supervising Office Assistant	\$ 38,584	\$ 53,082	1.9%	\$ 54,090	7/31/2021	7/30/2022	3.00%
4	County of Fresno	Senior Admitting Interviewer	\$ 38,610	\$ 49,374	4.7%	\$ 51,695	11/2/2020	unknown	unknown
5	City and County of San Francisco	N/C							
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Kern	N/C							
9	County of Los Angeles	N/C							
10	County of Orange	N/C							
11	County of Sacramento	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 53,082	\$ 54,090
% County of San Diego Above/Below	-1.4%	-3.4%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Adult Protective Services Specialist									
1	County of Alameda ¹	[Adult Protective Services Worker II/ Adult Protection Supervisor]	\$ 90,904	\$ 107,282	-11.4%	\$ 95,052	12/27/2020	12/26/2021	3.00%
2	County of San Bernardino	Lead Social Service Practitioner	\$ 63,461	\$ 89,419	1.9%	\$ 91,118	3/13/2021	3/26/2022	3.00%
3	County of Contra Costa	Social Worker III	\$ 83,461	\$ 101,448	-11.1%	\$ 90,187	7/1/2021	unknown	unknown
4	County of Ventura	HS Adult Protective Services Social Worker IV	\$ 64,539	\$ 86,061	-0.7%	\$ 85,458	12/26/2020	12/27/2021	2.00%
6	County of Fresno	Social Worker III	\$ 50,570	\$ 64,714	4.7%	\$ 67,756	11/2/2020	unknown	unknown
7	City and County of San Francisco	N/C							
8	County of Kern	N/C							
9	County of Los Angeles	N/C							
10	County of Orange	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 89,419	\$ 90,187
% County of San Diego Above/Below	-10.8%	-11.8%
Number of Matches	5	5

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Agricultural/Standards Inspector									
1	County of Santa Clara	Senior Biologist/Standards Inspector	\$ 104,549	\$ 127,065	-16.8%	\$ 105,718	6/14/2021	6/13/2022	3.00%
2	County of Orange	Senior Agricultural/Standards Inspector	\$ 67,912	\$ 91,541	-2.0%	\$ 89,710	7/2/2021	7/1/2022	3.50%
3	County of San Mateo	Biologist/Standards Specialist III	\$ 86,922	\$ 108,636	-17.5%	\$ 89,625	10/4/2020	unknown	unknown
5	County of Los Angeles	Agricultural/Weights & Measures Inspector II	\$ 58,848	\$ 79,302	-3.8%	\$ 76,288	1/1/2021	unknown	unknown
6	County of Alameda	Agricultural and Standards Investigator II	\$ 70,083	\$ 84,123	-11.4%	\$ 74,533	6/27/2021	6/26/2022	3.25%
7	County of San Bernardino	Agricultural/Standards Officer	\$ 50,960	\$ 71,739	1.9%	\$ 73,102	3/13/2021	3/26/2022	3.00%
8	County of Contra Costa	Agricultural Biologist II	\$ 67,648	\$ 82,226	-11.1%	\$ 73,099	7/1/2021	unknown	unknown
9	County of Ventura	Agricultural Inspector/Biologist	\$ 51,552	\$ 73,075	-0.7%	\$ 72,564	12/27/2020	12/26/2021	2.00%
10	County of Sacramento	Agricultural and Standards Inspector II	\$ 61,617	\$ 71,347	0.1%	\$ 71,418	6/30/2021	unknown	unknown
11	County of Fresno	Agricultural/Standards Specialist II	\$ 50,206	\$ 61,022	4.7%	\$ 63,890	4/19/2021	unknown	unknown
12	County of Riverside	Senior Agricultural Inspector	\$ 30,624	\$ 47,796	1.9%	\$ 48,704	5/1/2021	5/1/2022	2.00%
13	City and County of San Francisco	N/C							
14	County of Kern	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 79,302	\$ 73,102
% County of San Diego Above/Below	4.1%	11.6%
Number of Matches	11	11

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Air Pollution Chemist*									
1	South Coast Air Quality Management District	Principal Air Quality Chemist	\$ 97,956	\$ 131,616	-2.8%	\$ 127,931	1/1/2020	unknown	unknown
3	Bay Area Air Quality Management District	Senior Air Quality Chemist	\$ 101,434	\$ 123,294	-17.4%	\$ 101,841	11/8/2020	unknown	Unknown
4	Sacramento Metropolitan Air Quality Management District	N/C							
5	County of Orange	N/C							
6	County of Ventura	N/C							
7	County of Contra Costa	N/C							
8	San Luis Obispo County Air Pollution Control District	N/C							
9	Imperial County Air Pollution Control District	N/C							
10	County of Sacramento	N/C							
11	City and County of San Francisco	N/C							
12	County of Santa Clara	N/C							
13	County of Los Angeles	N/C							
14	County of Fresno	N/C							
15	County of Kern	N/C							
16	County of Alameda	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 127,455	\$ 114,886
% County of San Diego Above/Below	-12.3%	-1.3%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Air Pollution Control Engineer*									
1	Sacramento Metropolitan Air Quality Management District	Program Supervisor	\$ 101,971	\$ 136,655	0.1%	\$ 136,792	7/1/2021	unknown	unknown
3	San Luis Obispo County Air Pollution Control District	Air Pollution Control Engineer III	\$ 93,725	\$ 113,922	2.9%	\$ 117,225	7/1/2020	unknown	unknown
4	South Coast Air Quality Management District	Senior Air Quality Engineer	\$ 89,040	\$ 119,664	-2.8%	\$ 116,313	1/1/2020	unknown	unknown
5	County of Kern	Air Quality Engineer III	\$ 93,216	\$ 113,796	1.2%	\$ 115,162	4/21/2021	unknown	unknown
6	Bay Area Air Quality Management District	N/C							
7	County of Contra Costa	N/C							
8	County of Orange	N/C							
9	County of Ventura	N/C							
10	Imperial County Air Pollution Control District	N/C							
11	County of Alameda	N/C							
12	City and County of San Francisco	N/C							
13	County of Santa Clara	N/C							
14	County of Los Angeles	N/C							
15	County of Fresno	N/C							
16	County of Sacramento	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 116,793	\$ 116,769
% County of San Diego Above/Below	1.6%	1.6%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Airport Technician									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Airport Operations Supervisor	\$ 117,576	\$ 142,896	-17.4%	\$ 118,032	7/1/2021	1/8/2022	.50%
2	County of Orange	Airport Maintenance Supervisor	\$ 72,280	\$ 97,365	-2.0%	\$ 95,417	7/2/2021	7/1/2022	3.50%
3	County of Santa Clara	Airport Operations Supervisor	\$ 82,913	\$ 100,768	-16.8%	\$ 83,839	6/28/2021	6/27/2022	3.00%
4	County of San Diego	Senior Airport Technician	\$ 64,730	\$ 79,518		\$ 79,518	6/18/2021	unknown	unknown
5	County of Ventura	Airport Maintenance Supervisor	\$ 55,592	\$ 77,829	-0.7%	\$ 77,284	12/26/2020	12/27/2021	2.00%
6	County of San Bernardino	Airport Maintenance Supervisor	\$ 52,666	\$ 72,241	1.9%	\$ 73,613	7/31/2021	7/30/2022	3.00%
7	County of Kern	Airports Maintenance Supervisor	\$ 49,236	\$ 60,108	1.2%	\$ 60,829	4/21/2021	unknown	unknown
8	County of Alameda	N/C							
9	County of Contra Costa	N/C							
10	County of Fresno	N/C							
11	County of Los Angeles	N/C							
12	County of Riverside	N/C							
13	County of Sacramento	N/C							
14	County of San Mateo	N/C							

Summary Results		
	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 87,597	\$ 80,561
% County of San Diego Above/Below	-10.2%	-1.3%
Number of Matches	6	6

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Animal Services Representative									
1	County of Santa Clara	Senior Office Specialist	\$ 57,034	\$ 68,856	-16.8%	\$ 57,288	6/14/2021	6/13/2022	3.00%
2	County of Orange	Senior Animal Care Attendant	\$ 42,058	\$ 56,701	-2.0%	\$ 55,567	7/2/2021	7/1/2022	3.50%
4	City and County of San Francisco	N/C							
5	County of Alameda	N/C							
6	County of Contra Costa	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Los Angeles	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 62,779	\$ 56,428
% County of San Diego Above/Below	-18.7%	-6.7%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Assessment Clerk									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Orange	Senior Assessment Technician	\$ 54,974	\$ 73,528	-2.0%	\$ 72,057	7/2/2021	7/1/2022	3.50%
2	City and County of San Francisco	Senior Clerk	\$ 57,538	\$ 81,744	-17.4%	\$ 67,521	7/1/2021	1/8/2022	.50%
3	County of San Bernardino	Records Technician Supervisor I	\$ 45,448	\$ 62,525	1.9%	\$ 63,713	7/31/2021	7/30/2022	3.00%
4	County of Santa Clara	Senior Assessment Clerk	\$ 55,638	\$ 67,157	-16.8%	\$ 55,874	6/14/2021	6/13/2022	3.00%
5	County of Sacramento	Senior Office Specialist	\$ 45,936	\$ 55,812	0.1%	\$ 55,868	6/21/2020	unknown	unknown
6	County of San Diego	Senior Assessment Clerk	\$ 40,414	\$ 49,670		\$ 49,670	6/18/2021	unknown	unknown
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of Los Angeles	N/C							
12	County of Riverside	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 67,157	\$ 63,713
% County of San Diego Above/Below	-35.2%	-28.3%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Cadastral Technician									
1	County of Riverside	Senior Engineering Technician - PLS/PE	\$ 60,768	\$ 100,188	1.9%	\$ 102,092	5/1/2021	5/1/2022	2.00%
2	County of San Mateo	GIS Technician III	\$ 89,584	\$ 105,828	-17.5%	\$ 87,308	10/4/2020	unknown	unknown
3	County of Orange	Senior Cadastral Technician	\$ 59,384	\$ 79,997	-2.0%	\$ 78,397	7/2/2021	7/1/2022	3.50%
4	County of Contra Costa	Lead Computer Aided Drafting Operator	\$ 69,288	\$ 84,219	-11.1%	\$ 74,871	7/1/2021	unknown	unknown
6	County of Ventura	Cadastral Technician III	\$ 51,727	\$ 72,423	-0.7%	\$ 71,916	12/26/2020	12/27/2021	2.00%
7	County of Alameda	Mapping Technician III	\$ 66,495	\$ 79,463	-11.4%	\$ 70,404	6/27/2021	6/26/2022	3.25%
8	County of Santa Clara	Senior Cadastral Mapping Technician	\$ 68,370	\$ 82,609	-16.8%	\$ 68,731	6/14/2021	6/13/2022	3.00%
9	County of Kern	Drafting Technician III	\$ 53,064	\$ 64,776	1.2%	\$ 65,553	4/21/2021	unknown	unknown
10	County of San Bernardino	Cadastral Drafting Technician II	\$ 46,592	\$ 63,960	1.9%	\$ 65,175	7/31/2021	7/30/2022	3.00%
11	County of Fresno	Cadastral Technician III	\$ 48,516	\$ 62,036	4.7%	\$ 64,952	11/2/2020	unknown	unknown
12	City and County of San Francisco	N/C							
13	County of Los Angeles	N/C							
14	County of Sacramento	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 79,730	\$ 71,160
% County of San Diego Above/Below	-9.3%	2.4%
Number of Matches	10	10

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Cashier									
1	City and County of San Francisco	Cashier III	\$ 69,264	\$ 84,216	-17.4%	\$ 69,562	7/1/2021	1/8/2022	.50%
2	County of Santa Clara	Senior Cashier	\$ 64,935	\$ 78,969	-16.8%	\$ 65,702	6/28/2021	6/27/2022	3.00%
3	County of Los Angeles	Cashiering Services Representative II, Sheriff	\$ 43,190	\$ 59,725	-3.8%	\$ 57,456	1/1/2021	unknown	unknown
5	County of Alameda	N/C							
6	County of Contra Costa	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 78,969	\$ 65,702
% County of San Diego Above/Below	-58.1%	-31.6%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Civil Engineer									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Ventura	Staff Engineer	\$ 105,685	\$ 147,959	-0.7%	\$ 146,923	unknown	unknown	unknown
2	County of Alameda	Supervising Civil Engineer	\$ 135,990	\$ 165,381	-11.4%	\$ 146,527	6/13/2021	6/12/2022	3.50%
3	County of Orange	Senior Civil Engineer	\$ 107,619	\$ 145,142	-2.0%	\$ 142,240	7/2/2021	7/1/2022	3.50%
4	City and County of San Francisco	Engineer	\$ 141,622	\$ 172,198	-17.4%	\$ 142,236	7/1/2021	1/8/2022	.50%
5	County of Sacramento	Senior Civil Engineer	\$ 125,718	\$ 138,601	0.1%	\$ 138,740	6/21/2020	unknown	unknown
6	County of Los Angeles	Civil Engineer	\$ 112,548	\$ 143,659	-3.8%	\$ 138,200	1/1/2021	unknown	unknown
7	County of Riverside	Senior Civil Engineer	\$ 91,080	\$ 134,928	1.9%	\$ 137,492	5/1/2021	5/1/2022	2.00%
8	County of Santa Clara	Senior Civil Engineer	\$ 134,549	\$ 163,966	-16.8%	\$ 136,420	10/21/2020	10/20/2021	3.00%
9	County of San Bernardino	Supervising Engineer	\$ 95,222	\$ 131,290	1.9%	\$ 133,784	7/31/2021	7/30/2022	3.00%
10	County of San Mateo	Senior Civil Engineer	\$ 129,582	\$ 161,987	-17.5%	\$ 133,640	12/13/2020	unknown	unknown
11	County of San Diego	Senior Civil Engineer	\$ 105,435	\$ 129,605		\$ 129,605	6/18/2021	unknown	unknown
12	County of Fresno	Senior Engineer	\$ 90,584	\$ 110,110	4.7%	\$ 115,285	4/19/2021	unknown	unknown
13	County of Kern	Engineer III	\$ 82,704	\$ 100,968	1.2%	\$ 102,180	4/21/2021	unknown	unknown
14	County of Contra Costa	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 144,401	\$ 137,846
% County of San Diego Above/Below	-11.4%	-6.4%
Number of Matches	12	12

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Clinical Psychologist									
1	County of Santa Clara	Senior Psychologist	\$ 146,777	\$ 177,877	-16.8%	\$ 147,994	6/14/2021	6/13/2022	3.00%
2	County of Ventura	Lead Psychologist	\$ 100,598	\$ 130,778	-0.7%	\$ 129,862	12/27/2020	12/26/2021	2.00%
3	County of Fresno	Senior Licensed Psychologist	\$ 90,870	\$ 109,304	4.7%	\$ 114,441	11/2/2020	unknown	unknown
4	County of San Mateo ²	[Psychologist II/Supervising Psychologist]	\$ 109,416	\$ 136,768	-17.5%	\$ 112,833	10/4/2020	unknown	unknown
5	County of Alameda ¹	[Clinical Psychologist/ Senior Clinical Psychologist]	\$ 105,454	\$ 122,195	-11.4%	\$ 108,265	12/27/2020	12/26/2021	3.00%
6	County of San Bernardino	Clinical Therapist II - Psychologist	\$ 73,445	\$ 106,101	1.9%	\$ 108,117	3/13/2021	3/26/2022	3.00%
7	County of Orange	Clinical Psychologist II	\$ 80,538	\$ 108,493	-2.0%	\$ 106,323	7/2/2021	7/1/2022	3.50%
9	County of Riverside	Senior Clinical Psychologist	\$ 61,154	\$ 90,585	1.9%	\$ 92,306	5/1/2021	5/1/2022	2.00%
10	City and County of San Francisco	N/C							
11	County of Contra Costa	N/C							
12	County of Kern	N/C							
13	County of Los Angeles	N/C							
14	County of Sacramento	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 115,749	\$ 110,549
% County of San Diego Above/Below	-10.2%	-5.3%
Number of Matches	8	8

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

2 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Communicable Disease Investigator									
1	County of Santa Clara	Senior Communicable Disease Investigator	\$ 81,128	\$ 97,995	-16.8%	\$ 81,532	6/14/2021	6/13/2022	3.00%
2	County of San Mateo	Senior Communicable Diseases Investigator	\$ 75,253	\$ 94,077	-17.5%	\$ 77,613	10/4/2020	unknown	unknown
4	County of Orange	Senior Public Health Investigator	\$ 56,597	\$ 76,274	-2.0%	\$ 74,748	7/2/2021	7/1/2022	3.50%
5	County of Riverside	Senior Communicable Disease Specialist	\$ 45,996	\$ 71,772	1.9%	\$ 73,136	5/1/2021	5/1/2022	2.00%
6	County of Alameda ¹	[Public Health Investigator/ Senior Public Health Investigator]	\$ 63,710	\$ 76,844	-11.4%	\$ 68,084	12/27/2020	unknown	unknown
7	County of Sacramento	Senior Communicable Disease Investigator	\$ 55,436	\$ 67,380	0.1%	\$ 67,447	6/21/2020	unknown	unknown
8	County of San Bernardino	Communicable Disease Investigator II	\$ 47,736	\$ 65,603	1.9%	\$ 66,850	7/31/2021	7/30/2022	3.00%
9	City and County of San Francisco	N/C							
10	County of Contra Costa	N/C							
11	County of Fresno	N/C							
12	County of Kern	N/C							
13	County of Los Angeles	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 76,274	\$ 73,136
% County of San Diego Above/Below	-0.8%	3.3%
Number of Matches	7	7

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Construction Inspector									
1	City and County of San Francisco	Senior Construction Inspector	\$ 114,790	\$ 139,542	-17.4%	\$ 115,262	7/1/2021	1/8/2022	.50%
2	County of Alameda	Supervising Construction Inspector	\$ 66,206	\$ 128,398	-11.4%	\$ 113,761	12/27/2020	unknown	unknown
3	County of Riverside	Senior Construction Inspector	\$ 69,888	\$ 109,248	1.9%	\$ 111,324	5/1/2021	5/1/2022	2.00%
4	County of Los Angeles	Senior Construction Inspector	\$ 82,285	\$ 105,034	-3.8%	\$ 101,043	1/1/2021	unknown	unknown
5	County of Santa Clara	Senior Construction Inspector	\$ 99,283	\$ 120,675	-16.8%	\$ 100,402	6/14/2021	6/13/2022	3.00%
6	County of Contra Costa	Engineering Technician Supervisor - Construction	\$ 87,267	\$ 106,073	-11.1%	\$ 94,299	7/1/2021	unknown	unknown
7	County of Sacramento	Senior Construction Inspector	\$ 84,835	\$ 93,522	0.1%	\$ 93,616	6/21/2020	unknown	unknown
8	County of Orange	Senior Construction Inspector	\$ 69,826	\$ 93,995	-2.0%	\$ 92,115	7/2/2021	7/1/2022	3.50%
9	County of Ventura	Senior Public Works Inspector	\$ 65,098	\$ 91,522	-0.7%	\$ 90,882	12/26/2020	12/27/2021	2.00%
10	County of San Bernardino	Supervising Building Construction Inspector	\$ 64,480	\$ 88,608	1.9%	\$ 90,292	7/31/2021	7/30/2022	3.00%
11	County of Fresno	Supervising Building Inspector	\$ 70,330	\$ 85,488	4.7%	\$ 89,506	4/19/2021	unknown	unknown
12	County of Kern	Supervising Construction Project Inspector	\$ 71,208	\$ 86,940	1.2%	\$ 87,983	4/21/2021	unknown	unknown
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 99,515	\$ 93,957
% County of San Diego Above/Below	-14.0%	-7.7%
Number of Matches	12	12

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Cook									
1	City and County of San Francisco	Chef/Production Manager	\$ 75,948	\$ 92,352	-17.4%	\$ 76,283	7/1/2021	1/8/2022	.50%
2	County of Orange	Senior Head Cook	\$ 51,938	\$ 69,597	-2.0%	\$ 68,205	7/2/2021	7/1/2022	3.50%
3	County of San Mateo ²	[Cook II/Supervising Cook]	\$ 65,124	\$ 72,799	-17.5%	\$ 60,059	10/4/2020	unknown	unknown
4	County of Alameda	First Cook	\$ 54,744	\$ 64,911	-11.4%	\$ 57,511	6/27/2021	6/26/2022	3.25%
5	County of Santa Clara	Cook II	\$ 55,821	\$ 67,419	-16.8%	\$ 56,093	6/14/2021	6/13/2022	3.00%
6	County of Kern ¹	[Cook III/ Juvenile Corrections Senior Cook]	\$ 45,228	\$ 55,224	1.2%	\$ 55,887	4/21/2021	unknown	unknown
7	County of Los Angeles	Senior Cook	\$ 41,840	\$ 56,289	-3.8%	\$ 54,150	1/1/2021	unknown	unknown
8	County of Contra Costa	Lead Cook	\$ 54,850	\$ 60,472	-11.1%	\$ 53,759	7/1/2021	unknown	unknown
9	County of Riverside	Senior Cook	\$ 33,480	\$ 52,248	1.9%	\$ 53,241	5/1/2021	5/1/2022	2.00%
10	County of Sacramento	Senior Food Service Cook	\$ 42,407	\$ 51,574	0.1%	\$ 51,626	6/21/2020	unknown	unknown
12	County of San Bernardino	Cook III	\$ 33,072	\$ 45,448	1.9%	\$ 46,311	7/31/2021	7/30/2022	3.00%
13	County of Fresno	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 60,472	\$ 55,887
% County of San Diego Above/Below	-25.2%	-15.7%
Number of Matches	11	11

N/C - Non Comparator

1 - County of Kern: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

2 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches. Bottom of range is step 3 for both classes.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Electronic Security & Systems Technician									
1	City and County of San Francisco	Electronic Maintenance Technician Assistant Supervisor	\$ 119,604	\$ 145,416	-17.4%	\$ 120,114	7/1/2021	1/8/2022	.50%
2	County of Los Angeles	Audio, Video, and Security Systems Technician	\$ 95,261	\$ 95,261	-3.8%	\$ 91,641	1/1/2021	unknown	unknown
3	County of Ventura	Senior Digital Systems Electronics Technician	\$ 72,990	\$ 91,896	-0.7%	\$ 91,253	1/10/2021	1/9/2022	2.00%
4	County of Contra Costa	Lead Electronic Systems Specialist	\$ 81,021	\$ 98,481	-11.1%	\$ 87,550	7/1/2021	unknown	unknown
6	County of Alameda	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 96,871	\$ 91,447
% County of San Diego Above/Below	-16.1%	-9.6%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Emergency Services Coordinator									
1	County of San Mateo ²	[District Coordinator Sheriff's Office of Emergency Services/Director of Emergency Preparedness]	\$ 120,627	\$ 150,828	-17.5%	\$ 124,433	12/13/2020	unknown	unknown
2	County of Santa Clara	Senior Emergency Planning Coordinator	\$ 110,639	\$ 134,499	-16.8%	\$ 111,903	6/28/2021	6/27/2022	3.00%
3	City and County of San Francisco	Emergency Services Coordinator III	\$ 108,836	\$ 132,288	-17.4%	\$ 109,270	7/1/2021	1/8/2022	.50%
4	County of Contra Costa ¹	[Senior Emergency Planning Coordinator/Emergency Services Manager]	\$ 91,204	\$ 117,018	-11.1%	\$ 104,029	7/1/2021	unknown	unknown
6	County of San Bernardino	Senior Emergency Medical Services Specialist	\$ 63,502	\$ 91,707	1.9%	\$ 93,450	3/13/2021	3/26/2022	3.00%
7	County of Riverside	Senior Emergency Medical Services Specialist	\$ 61,500	\$ 91,032	1.9%	\$ 92,762	5/1/2021	5/1/2022	2.00%
8	County of Alameda	Senior Emergency Services Coordinator	\$ 80,579	\$ 97,968	-11.4%	\$ 86,800	11/1/2020	10/31/2021	2.00%
9	County of Kern	Senior Emergency Medical Services Coordinator	\$ 64,776	\$ 79,080	1.2%	\$ 80,029	4/21/2021	unknown	unknown
10	County of Fresno	N/C							
11	County of Los Angeles	N/C							
12	County of Orange	N/C							
13	County of Sacramento	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 107,493	\$ 98,739
% County of San Diego Above/Below	-6.3%	2.4%
Number of Matches	8	8

N/C - Non Comparator

1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

2 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Epidemiologist									
2	County of Santa Clara	Senior Epidemiologist	\$ 108,405	\$ 131,175	-16.8%	\$ 109,138	6/14/2021	6/13/2022	3.00%
3	County of Orange	Senior Epidemiologist	\$ 78,374	\$ 105,622	-2.0%	\$ 103,510	7/2/2021	7/1/2022	3.50%
4	County of Alameda	Epidemiologist III	\$ 95,992	\$ 116,688	-11.4%	\$ 103,386	12/27/2020	12/26/2021	3.00%
5	County of San Mateo ¹	[Epidemiologist II/Supervising Epidemiologist]	\$ 97,186	\$ 121,490	-17.5%	\$ 100,230	10/4/2020	unknown	unknown
6	County of Fresno	Senior Epidemiologist	\$ 78,338	\$ 95,212	4.7%	\$ 99,687	4/19/2021	unknown	unknown
7	County of Contra Costa	Public Health Epidemiologist and Biostatistician	\$ 91,333	\$ 111,016	-11.1%	\$ 98,693	7/1/2021	unknown	unknown
8	County of Kern	Senior Public Health Epidemiologist	\$ 73,008	\$ 89,124	1.2%	\$ 90,193	4/21/2021	unknown	unknown
9	City and County of San Francisco	N/C							
10	County of Los Angeles	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 111,016	\$ 100,230
% County of San Diego Above/Below	3.0%	12.5%
Number of Matches	7	7

N/C - Non Comparator

1 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Forensic Evidence Technician									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Latent Fingerprint Examiner III	\$ 103,653	\$ 125,409	-16.8%	\$ 104,341	6/14/2021	6/13/2022	3.00%
2	County of Orange	Senior Forensic Specialist	\$ 76,274	\$ 102,814	-2.0%	\$ 100,758	7/2/2021	7/1/2022	3.50%
3	County of San Bernardino	Sheriff's Lead Crime Scene Specialist	\$ 64,480	\$ 88,608	1.9%	\$ 90,292	7/31/2021	7/30/2022	3.00%
4	County of San Diego	Senior Forensic Evidence Technician	\$ 70,366	\$ 86,507		\$ 86,507	6/18/2021	unknown	unknown
5	County of Riverside	Senior Forensic Services Specialist	\$ 46,188	\$ 72,180	1.9%	\$ 73,551	5/1/2021	5/1/2022	2.00%
6	City and County of San Francisco	N/C							
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of Los Angeles	N/C							
12	County of Sacramento	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 95,711	\$ 95,525
% County of San Diego Above/Below	-10.6%	-10.4%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Geographic Information Systems Analyst									
1	County of Santa Clara	Senior Geographic Information Systems (GIS) Analyst	\$ 141,833	\$ 172,401	-16.8%	\$ 143,437	6/14/2021	6/13/2022	3.00%
2	County of Orange	GIS Supervisor	\$ 91,541	\$ 123,282	-2.0%	\$ 120,816	7/2/2021	7/1/2022	3.50%
3	County of Los Angeles	Senior Geographic Information Systems Analyst	\$ 93,550	\$ 119,403	-3.8%	\$ 114,866	1/1/2021	unknown	unknown
4	County of Sacramento	Geographic Information Systems Analyst III	\$ 89,554	\$ 114,276	0.1%	\$ 114,390	6/21/2020	unknown	unknown
6	County of Riverside	Senior GIS Specialist	\$ 49,776	\$ 77,736	1.9%	\$ 79,213	5/1/2021	5/1/2022	2.00%
7	City and County of San Francisco	N/C							
8	County of Alameda	N/C							
9	County of Contra Costa	N/C							
10	County of Fresno	N/C							
11	County of Kern	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 119,403	\$ 114,866
% County of San Diego Above/Below	-25.7%	-20.9%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Health Information Management Technician									
1	County of Contra Costa ¹	[Medical Records Technician/Registered Health Information Technologist]	\$ 55,106	\$ 68,492	-11.1%	\$ 60,890	7/1/2021	unknown	unknown
2	County of Ventura	Records Technician IV	\$ 39,741	\$ 55,637	-0.7%	\$ 55,247	12/27/2020	12/26/2021	2.00%
4	City and County of San Francisco	N/C							
5	County of Alameda	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Los Angeles	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 62,064	\$ 58,068
% County of San Diego Above/Below	-17.2%	-9.6%
Number of Matches	2	2

N/C - Non Comparator

1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Health Physicist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Los Angeles	Head Radiation Control	\$ 119,988	\$ 161,700	-3.8%	\$ 155,555	1/1/2021	unknown	unknown
2	County of San Diego	Senior Health Physicist	\$ 96,824	\$ 118,934		\$ 118,934	6/18/2021	unknown	unknown
3	City and County of San Francisco	N/C							
4	County of Alameda	N/C							
5	County of Contra Costa	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 161,700	\$ 155,555
% County of San Diego Above/Below	-36.0%	-30.8%
Number of Matches	1	1

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior HHSA Contract Auditor									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco ¹	[Auditor II/ Auditor III]	\$ 112,728	\$ 137,016	-17.4%	\$ 113,175	7/1/2021	1/8/2022	.50%
2	County of Los Angeles	Senior Contract Program Auditor	\$ 77,748	\$ 104,772	-3.8%	\$ 100,791	1/1/2021	unknown	unknown
3	County of Sacramento	Senior Auditor	\$ 79,114	\$ 96,152	0.1%	\$ 96,248	6/21/2020	unknown	unknown
4	County of San Diego	Senior HHSA Contract Auditor	\$ 78,229	\$ 96,179		\$ 96,179	6/18/2021	unknown	unknown
5	County of Fresno	Financial Analyst III	\$ 62,478	\$ 75,920	4.7%	\$ 79,488	4/19/2021	unknown	unknown
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Kern	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 100,462	\$ 98,519
% County of San Diego Above/Below	-4.5%	-2.4%
Number of Matches	4	4

N/C - Non Comparator

1 - City and County of San Francisco: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Histology Technician									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Senior Histologic Technician	\$ 91,720	\$ 129,172	-16.8%	\$ 107,471	10/21/2020	10/20/2021	3.00%
2	County of Los Angeles	Tissue Analysis Technician II	\$ 56,992	\$ 76,804	-3.8%	\$ 73,886	1/1/2021	unknown	unknown
3	County of San Diego	Senior Histology Technician	\$ 56,389	\$ 69,326		\$ 69,326	6/18/2021	unknown	unknown
4	City and County of San Francisco	N/C							
5	County of Alameda	N/C							
6	County of Contra Costa	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 102,988	\$ 90,679
% County of San Diego Above/Below	-48.6%	-30.8%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Hydrogeologist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Diego	Senior Hydrogeologist	\$ 92,976	\$ 114,317		\$ 114,317	6/18/2021	unknown	unknown
2	County of Fresno	Senior Geologist	\$ 82,888	\$ 100,750	4.7%	\$ 105,485	4/19/2021	unknown	unknown
3	County of Kern	Engineer III	\$ 82,704	\$ 100,968	1.2%	\$ 102,180	4/21/2021	unknown	unknown
4	City and County of San Francisco	N/C							
5	County of Alameda	N/C							
6	County of Contra Costa	N/C							
7	County of Los Angeles	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 100,859	\$ 103,832
% County of San Diego Above/Below	11.8%	9.2%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Insect Detection Specialist									
1	City and County of San Francisco	Senior Integrated Pest Management Specialist	\$ 88,140	\$ 107,146	-17.4%	\$ 88,503	7/1/2021	1/8/2022	.50%
2	County of San Mateo	Pest Detection Supervisor	\$ 62,212	\$ 77,790	-17.5%	\$ 64,177	10/4/2020	unknown	unknown
4	County of Alameda	N/C							
5	County of Contra Costa	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Los Angeles	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 92,468	\$ 76,340
% County of San Diego Above/Below	-59.7%	-31.9%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Laboratory Assistant									
1	County of Santa Clara	Medical Laboratory Assistant III	\$ 64,305	\$ 77,671	-16.8%	\$ 64,623	6/14/2021	6/13/2022	3.00%
2	County of San Mateo ¹	[Laboratory Assistant II/Laboratory Support Services Supervisor]	\$ 60,849	\$ 76,054	-17.5%	\$ 62,744	10/4/2020	unknown	unknown
3	County of Orange	Senior Laboratory Assistant	\$ 42,016	\$ 56,410	-2.0%	\$ 55,281	7/2/2021	7/1/2022	3.50%
4	County of Riverside	Senior Laboratory Assistant	\$ 34,200	\$ 53,388	1.9%	\$ 54,402	5/1/2021	5/1/2022	2.00%
6	County of Los Angeles	Senior Laboratory Assistant	\$ 38,056	\$ 51,129	-3.8%	\$ 49,186	1/1/2021	unknown	unknown
7	City and County of San Francisco	N/C							
8	County of Alameda	N/C							
9	County of Contra Costa	N/C							
10	County of Fresno	N/C							
11	County of Kern	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 56,410	\$ 55,281
% County of San Diego Above/Below	-11.2%	-9.0%
Number of Matches	5	5

N/C - Non Comparator

1 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Land Surveyor									
1	City and County of San Francisco	Chief Surveyor	\$ 129,636	\$ 169,780	-17.4%	\$ 140,238	7/1/2021	1/8/2022	.50%
2	County of Sacramento	Senior Land Surveyor	\$ 124,466	\$ 137,223	0.1%	\$ 137,360	6/21/2020	unknown	unknown
3	County of Riverside	Senior Land Surveyor	\$ 88,152	\$ 130,596	1.9%	\$ 133,077	5/1/2021	5/1/2022	2.00%
4	County of Santa Clara	County Surveyor, Supervisor Surveying And Mapping	\$ 131,146	\$ 159,438	-16.8%	\$ 132,653	6/28/2021	6/27/2022	3.00%
6	County of Orange	Senior Land Surveyor	\$ 92,248	\$ 124,301	-2.0%	\$ 121,815	7/2/2021	7/1/2022	3.50%
7	County of Ventura	Surveyor IV	\$ 81,564	\$ 122,219	-0.7%	\$ 121,364	1/10/2021	1/9/2022	2.00%
8	County of Alameda ¹	[Land Surveyor/ Senior Land Surveyor]	\$ 115,534	\$ 135,106	-11.4%	\$ 119,704	6/13/2021	6/12/2022	3.50%
9	County of Contra Costa ²	[Engineering Technician Supervisor - Land Surveyor/Senior Land Surveyor]	\$ 102,614	\$ 118,062	-11.1%	\$ 104,958	7/1/2021	unknown	unknown
10	County of Kern	Engineer III	\$ 82,704	\$ 100,968	1.2%	\$ 102,180	4/21/2021	unknown	unknown
11	County of Fresno	Field Survey Supervisor	\$ 62,868	\$ 76,414	4.7%	\$ 80,005	4/19/2021	unknown	unknown
12	County of Los Angeles	N/C							
13	County of San Bernardino	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 127,448	\$ 121,589
% County of San Diego Above/Below	1.7%	6.2%
Number of Matches	10	10

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

2 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Latent Print Examiner									
2	County of Contra Costa	Supervising Fingerprint Examiner	\$ 96,875	\$ 120,696	-11.1%	\$ 107,299	7/1/2021	7/1/2022	5.00%
3	County of Santa Clara	Latent Fingerprint Examiner III	\$ 103,653	\$ 125,409	-16.8%	\$ 104,341	6/14/2021	6/13/2022	3.00%
4	County of Alameda ¹	[Latent Fingerprint Examiner/ Identification Supervisor]	\$ 74,737	\$ 90,085	-11.4%	\$ 79,815	11/1/2020	10/31/2021	2.00%
5	City and County of San Francisco	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Los Angeles	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 120,696	\$ 104,341
% County of San Diego Above/Below	-1.0%	12.7%
Number of Matches	3	3

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Laundry Worker									
1	County of Alameda ¹	[Laundry Service Worker/ Laundry Supervisor, Santa Rita Jail]	\$ 49,013	\$ 58,568	-11.4%	\$ 51,891	6/27/2021	6/26/2022	3.25%
3	County of Riverside	Senior Laundry Worker	\$ 29,652	\$ 46,296	1.9%	\$ 47,176	5/1/2021	5/1/2022	2.00%
4	County of Fresno	Laundry Supervisor - Branch Jail	\$ 33,904	\$ 43,394	4.7%	\$ 45,434	11/2/2020	unknown	unknown
5	County of Ventura	Laundry Assistant Supervisor	\$ 31,985	\$ 43,003	-0.7%	\$ 42,702	12/26/2020	12/27/2021	2.00%
6	County of Los Angeles	Senior Laundry Worker	\$ 32,263	\$ 43,295	-3.8%	\$ 41,650	1/1/2021	unknown	unknown
7	City and County of San Francisco	N/C							
8	County of Contra Costa	N/C							
9	County of Kern	N/C							
10	County of Orange	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 43,394	\$ 45,434
% County of San Diego Above/Below	8.9%	4.6%
Number of Matches	5	5

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Litigation Investigator									
1	City and County of San Francisco	Senior Claims Investigator, City Attorneys Office	\$ 118,716	\$ 144,352	-17.4%	\$ 119,235	7/1/2021	1/8/2022	.50%
3	County of Alameda	N/C							
4	County of Contra Costa	N/C							
5	County of Fresno	N/C							
6	County of Kern	N/C							
7	County of Los Angeles	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 144,352	\$ 119,235
% County of San Diego Above/Below	-34.1%	-10.8%
Number of Matches	1	1

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Mail Carrier									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Mateo	Lead Mail Services Driver	\$ 54,953	\$ 68,680	-17.5%	\$ 56,661	10/4/2020	unknown	unknown
2	County of San Bernardino	Mail Services Supervisor	\$ 37,440	\$ 51,376	1.9%	\$ 52,352	7/31/2021	7/30/2022	3.00%
3	County of Riverside	Supervising Mail Clerk	\$ 32,491	\$ 47,981	1.9%	\$ 48,893	5/1/2021	5/1/2022	2.00%
4	County of San Diego	Senior Mail Carrier	\$ 39,146	\$ 48,090		\$ 48,090	6/18/2021	unknown	unknown
5	City and County of San Francisco	N/C							
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Los Angeles	N/C							
11	County of Orange	N/C							
12	County of Sacramento	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 51,376	\$ 52,352
% County of San Diego Above/Below	-6.8%	-8.9%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Medical Transcriber									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Senior Medical Transcriber Typist	\$ 69,992	\$ 84,994	-17.4%	\$ 70,205	7/1/2021	1/8/2022	.50%
2	County of San Diego	Senior Medical Transcriber	\$ 45,448	\$ 55,869		\$ 55,869	6/18/2021	unknown	unknown
3	County of Ventura	Information Processing Operator IV	\$ 38,031	\$ 53,219	-0.7%	\$ 52,847	12/27/2020	12/26/2021	2.00%
4	County of Alameda	N/C							
5	County of Contra Costa	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Los Angeles	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 69,107	\$ 61,526
% County of San Diego Above/Below	-23.7%	-10.1%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Meteorologist									
2	South Coast Air Quality Management District	Senior Meteorologist	\$ 87,108	\$ 117,060	-2.8%	\$ 113,782	1/1/2020	unknown	unknown
3	Sacramento Metropolitan Air Quality Management District	N/C							
4	Bay Area Air Quality Management District	N/C							
5	County of Orange	N/C							
6	County of Ventura	N/C							
7	County of Contra Costa	N/C							
8	San Luis Obispo County Air Pollution Control District	N/C							
9	Imperial County Air Pollution Control District	N/C							
10	County of Sacramento	N/C							
11	City and County of San Francisco	N/C							
12	County of Santa Clara	N/C							
13	County of Los Angeles	N/C							
14	County of Fresno	N/C							
15	County of Kern	N/C							
16	County of Alameda	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 117,060	\$ 113,782
% County of San Diego Above/Below	-2.3%	0.6%
Number of Matches	1	1

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Occupational/Physical Therapist									
1	City and County of San Francisco ¹	[Senior Physical Therapist/ Senior Occupational Therapist]	\$ 112,008	\$ 157,612	-17.4%	\$ 130,187	7/1/2021	1/8/2022	.50%
2	County of San Bernardino	Lead Occupational Therapist/Lead Physical Therapist	\$ 76,586	\$ 110,760	1.9%	\$ 112,864	3/13/2021	3/26/2022	3.00%
3	County of Ventura ⁵	[Senior Occupational Therapist/ Senior Physical Therapist]	\$ 76,190	\$ 112,216	-0.7%	\$ 111,430	12/27/2020	12/26/2021	2.00%
4	County of Fresno ³	[Occupational Therapist III / Physical Therapist III]	\$ 81,224	\$ 103,896	4.7%	\$ 108,779	11/2/2020	unknown	unknown
5	County of Sacramento	Senior Therapist	\$ 88,782	\$ 107,908	0.1%	\$ 108,016	6/21/2020	unknown	unknown
6	County of Kern	Senior Occupational/Physical Therapist	\$ 85,644	\$ 104,556	1.2%	\$ 105,811	4/21/2021	unknown	unknown
7	County of San Mateo ⁴	[Physical Therapist II - CCS/Supervising Therapist]	\$ 100,441	\$ 125,557	-17.5%	\$ 103,584	10/4/2020	unknown	unknown
8	County of Alameda	Senior Therapist	\$ 94,205	\$ 114,465	-11.4%	\$ 101,416	6/27/2021	6/26/2022	3.25%
9	County of Contra Costa ²	[Physical Therapist II/Supervising Pediatric Therapist]	\$ 93,597	\$ 113,768	-11.1%	\$ 101,140	7/1/2021	unknown	unknown
11	County of Los Angeles	N/C							
12	County of Orange	N/C							
13	County of Riverside	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 112,216	\$ 108,016
% County of San Diego Above/Below	-11.2%	-7.0%
Number of Matches	9	9

N/C - Non Comparator

1 - City and County of San Francisco: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the same for both matches.

2 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

3 - County of Fresno: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the same for both matches.

4 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

5 - County of Ventura: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Office Assistant									
1	County of Alameda	Supervising Clerk I	\$ 67,454	\$ 81,827	-11.4%	\$ 72,499	12/27/2020	12/26/2021	3.00%
2	City and County of San Francisco	Senior Clerk	\$ 57,538	\$ 81,744	-17.4%	\$ 67,521	7/1/2021	1/8/2022	.50%
3	County of Ventura	Clerical Supervisor I	\$ 41,469	\$ 58,023	-0.7%	\$ 57,617	12/26/2020	12/27/2021	2.00%
4	County of Santa Clara	Senior Office Specialist	\$ 57,034	\$ 68,856	-16.8%	\$ 57,288	6/14/2021	6/13/2022	3.00%
5	County of Fresno	Supervising Office Assistant	\$ 42,146	\$ 53,924	4.7%	\$ 56,458	11/2/2020	unknown	unknown
6	County of Contra Costa ¹	[Clerk - Experienced Level/Clerical Supervisor]	\$ 49,494	\$ 62,465	-11.1%	\$ 55,531	7/1/2021	unknown	unknown
7	County of San Bernardino	Supervising Office Assistant	\$ 38,584	\$ 53,082	1.9%	\$ 54,090	7/31/2021	7/30/2022	3.00%
8	County of Riverside	Supervising Office Assistant I	\$ 33,069	\$ 52,944	1.9%	\$ 53,950	5/1/2021	5/1/2022	2.00%
9	County of Sacramento	Senior Office Assistant	\$ 41,134	\$ 50,008	0.1%	\$ 50,058	6/21/2020	unknown	unknown
11	County of Kern	Senior Office Services Specialist	\$ 36,684	\$ 44,784	1.2%	\$ 45,321	4/21/2021	unknown	unknown
12	County of Los Angeles	N/C							
13	County of Orange	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 55,973	\$ 55,995
% County of San Diego Above/Below	-15.1%	-15.1%
Number of Matches	10	10

N/C - Non Comparator

1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Park Ranger									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Senior Park Ranger	\$ 89,103	\$ 107,831	-16.8%	\$ 89,716	6/14/2021	6/13/2022	3.00%
2	County of San Mateo ²	[Park Ranger II/Park Ranger III]	\$ 75,856	\$ 94,846	-17.5%	\$ 78,248	10/4/2020	unknown	unknown
3	City and County of San Francisco ¹	[Park Ranger/ Head Park Ranger]	\$ 76,079	\$ 92,480	-17.4%	\$ 76,388	7/1/2021	1/8/2022	.50%
4	County of San Bernardino	Park Ranger III	\$ 46,904	\$ 64,501	1.9%	\$ 65,726	7/31/2021	7/30/2022	3.00%
5	County of Riverside	Senior Park Ranger - Parks	\$ 43,224	\$ 63,744	1.9%	\$ 64,955	5/1/2021	5/1/2022	2.00%
6	County of San Diego	Senior Park Ranger	\$ 50,918	\$ 62,608		\$ 62,608	6/18/2021	unknown	unknown
7	County of Ventura	Park Services Ranger II	\$ 42,981	\$ 60,201	-0.7%	\$ 59,779	10/4/2020	unknown	unknown
8	County of Kern	Senior Park Ranger	\$ 45,912	\$ 56,052	1.2%	\$ 56,725	4/21/2021	unknown	unknown
9	County of Alameda	N/C							
10	County of Contra Costa	N/C							
11	County of Fresno	N/C							
12	County of Los Angeles	N/C							
13	County of Orange	N/C							
14	County of Sacramento	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 64,501	\$ 65,726
% County of San Diego Above/Below	-3.0%	-5.0%
Number of Matches	7	7

N/C - Non Comparator

1 - City and County of San Francisco: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

2 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Payroll Clerk									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Senior Payroll And Personnel Clerk	\$ 77,870	\$ 94,640	-17.4%	\$ 78,173	7/1/2021	1/8/2022	.50%
2	County of Los Angeles	Supervising Payroll Clerk II	\$ 52,405	\$ 72,571	-3.8%	\$ 69,813	1/1/2021	unknown	unknown
3	County of San Diego	Senior Payroll Clerk	\$ 41,330	\$ 50,731		\$ 50,731	6/18/2021	unknown	unknown
4	County of Alameda	N/C							
5	County of Contra Costa	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 83,605	\$ 73,993
% County of San Diego Above/Below	-64.8%	-45.9%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Precinct Planning Technician									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Contra Costa	Elections Services Specialist	\$ 57,122	\$ 69,432	-11.1%	\$ 61,725	7/1/2021	unknown	unknown
2	County of San Diego	Senior Precinct Planning Technician	\$ 48,381	\$ 59,405		\$ 59,405	6/18/2021	unknown	unknown
3	City and County of San Francisco	N/C							
4	County of Alameda	N/C							
5	County of Fresno	N/C							
6	County of Kern	N/C							
7	County of Los Angeles	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 69,432	\$ 61,725
% County of San Diego Above/Below	-16.9%	-3.9%
Number of Matches	1	1

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Procurement Contracting Officer									
1	City and County of San Francisco	Supervising Purchaser	\$ 130,312	\$ 170,352	-17.4%	\$ 140,711	7/1/2021	1/8/2022	.50%
2	County of Sacramento	Contract Services Manager I	\$ 108,305	\$ 119,392	0.1%	\$ 119,511	6/21/2020	unknown	unknown
4	County of Santa Clara	Procurement Contracts Specialist	\$ 109,978	\$ 133,731	-16.8%	\$ 111,265	6/28/2021	6/27/2022	3.00%
5	County of Riverside	Senior Procurement Contract Specialist	\$ 62,479	\$ 102,875	1.9%	\$ 104,830	5/1/2021	5/1/2022	2.00%
6	County of Orange	Supervising Procurement Contract Specialist	\$ 78,374	\$ 105,622	-2.0%	\$ 103,510	7/2/2021	7/1/2022	3.50%
7	County of Contra Costa ¹	[Senior Buyer/Procurement Services Manager]	\$ 92,936	\$ 112,964	-11.1%	\$ 100,425	7/1/2021	unknown	unknown
8	County of San Bernardino	Supervising Buyer	\$ 67,579	\$ 93,122	1.9%	\$ 94,891	7/31/2021	7/30/2022	3.00%
9	County of Alameda	Procurement and Contracts Supervisor	\$ 86,382	\$ 105,019	-11.4%	\$ 93,047	12/27/2020	12/26/2021	3.00%
10	County of Fresno	N/C							
11	County of Kern	N/C							
12	County of Los Angeles	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 109,293	\$ 104,170
% County of San Diego Above/Below	5.3%	9.7%
Number of Matches	8	8

N/C - Non Comparator

1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Protective Services Worker									
1	County of Alameda ¹	[Child Welfare Worker II/ Child Welfare Supervisor]	\$ 92,414	\$ 108,932	-11.4%	\$ 96,513	9/6/2020	unknown	unknown
2	County of San Mateo	Children's Services Social Worker III	\$ 92,350	\$ 115,459	-17.5%	\$ 95,253	10/4/2020	unknown	unknown
3	County of San Bernardino	Lead Social Service Practitioner	\$ 63,461	\$ 89,419	1.9%	\$ 91,118	3/13/2021	3/26/2022	3.00%
4	County of Contra Costa	Social Worker III	\$ 83,461	\$ 101,448	-11.1%	\$ 90,187	7/1/2021	unknown	unknown
5	County of Ventura	HS Child Welfare Social Worker IV	\$ 55,143	\$ 87,933	-0.7%	\$ 87,318	12/26/2020	12/27/2021	2.00%
6	County of Riverside	Social Services Practitioner III	\$ 53,476	\$ 83,439	1.9%	\$ 85,024	5/1/2021	5/1/2022	2.00%
8	County of Fresno	Social Worker III	\$ 50,570	\$ 64,714	4.7%	\$ 67,756	11/2/2020	unknown	unknown
9	City and County of San Francisco	N/C							
10	County of Kern	N/C							
11	County of Los Angeles	N/C							
12	County of Orange	N/C							
13	County of Sacramento	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 89,419	\$ 90,187
% County of San Diego Above/Below	-10.9%	-11.8%
Number of Matches	7	7

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Public Health Microbiologist									
1	County of Santa Clara	Senior Public Health Microbiologist	\$ 117,765	\$ 165,926	-16.8%	\$ 138,050	10/21/2020	10/20/2021	3.00%
2	City and County of San Francisco	Microbiologist II	\$ 122,330	\$ 148,668	-17.4%	\$ 122,800	7/1/2021	1/8/2022	.50%
3	County of Los Angeles	Public Health Microbiologist II	\$ 82,080	\$ 110,616	-3.8%	\$ 106,413	1/1/2021	unknown	unknown
4	County of San Mateo ¹	[Public Health Microbiologist II/Supervising Public Health Microbiologist]	\$ 99,526	\$ 124,413	-17.5%	\$ 102,641	10/4/2020	unknown	unknown
5	County of Contra Costa	Senior Public Health Microbiologist	\$ 89,324	\$ 108,574	-11.1%	\$ 96,522	7/1/2021	unknown	Unknown
6	County of Ventura	Microbiologist III	\$ 67,988	\$ 95,355	-0.7%	\$ 94,687	12/26/2020	12/27/2021	2.00%
8	County of San Bernardino	Public Health Microbiologist III	\$ 63,502	\$ 91,707	1.9%	\$ 93,450	3/13/2021	3/26/2022	3.00%
9	County of Sacramento	Senior Public Health Microbiologist	\$ 75,043	\$ 91,225	0.1%	\$ 91,316	6/21/2020	unknown	unknown
10	County of Alameda	Senior Microbiologist	\$ 83,696	\$ 100,447	-11.4%	\$ 88,996	6/27/2021	6/26/2022	3.25%
11	County of Fresno	N/C							
12	County of Kern	N/C							
13	County of Orange	N/C							
14	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 108,574	\$ 96,522
% County of San Diego Above/Below	-15.1%	-2.3%
Number of Matches	9	9

N/C - Non Comparator

1 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Public Health Nurse									
1	County of Santa Clara	Public Health Nurse III	\$ 138,324	\$ 167,656	-16.8%	\$ 139,490	6/14/2021	6/13/2022	3.00%
2	County of San Mateo ¹	[Public Health Nurse/Senior Public Health Nurse]	\$ 126,462	\$ 153,771	-17.5%	\$ 126,861	2/7/2021	unknown	unknown
3	County of Alameda	Registered Nurse III (PHN Designation)	\$ 115,670	\$ 142,407	-11.4%	\$ 126,173	6/27/2021	6/26/2022	3.25%
4	County of Sacramento	Senior Public Health Nurse	\$ 92,164	\$ 112,042	0.1%	\$ 112,154	8/2/2020	unknown	unknown
5	County of Riverside	Registered Nurse III	\$ 82,380	\$ 106,776	1.9%	\$ 108,805	5/1/2021	5/1/2022	2.00%
6	County of Orange	Senior Public Health Nurse	\$ 82,181	\$ 110,490	-2.0%	\$ 108,280	7/2/2021	7/1/2022	3.50%
7	County of Ventura	Senior Registered Nurse - Public Health	\$ 90,678	\$ 108,405	-0.7%	\$ 107,647	4/4/2021	4/17/2022	3.25%
9	City and County of San Francisco	N/C							
10	County of Contra Costa	N/C							
11	County of Fresno	N/C							
12	County of Kern	N/C							
13	County of Los Angeles	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 112,042	\$ 112,154
% County of San Diego Above/Below	-12.4%	-12.5%
Number of Matches	7	7

N/C - Non Comparator

1 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches. Bottom of range is step 2 for PHN, step 1 for Senior.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Real Property Agent									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Senior Real Property Officer	\$ 124,878	\$ 151,762	-17.4%	\$ 125,355	7/1/2021	1/8/2022	.50%
2	County of Santa Clara	Senior Real Estate Agent	\$ 116,624	\$ 141,762	-16.8%	\$ 117,946	6/28/2021	6/27/2022	3.00%
3	County of Orange	Senior Real Property Agent	\$ 82,181	\$ 110,490	-2.0%	\$ 108,280	7/2/2021	7/1/2022	3.50%
4	County of Los Angeles	Senior Real Property Agent	\$ 86,020	\$ 109,808	-3.8%	\$ 105,635	1/1/2021	unknown	unknown
5	County of Contra Costa	Senior Real Property Agent	\$ 87,386	\$ 108,874	-11.1%	\$ 96,789	7/1/2021	unknown	unknown
6	County of Riverside	Senior Real Property Agent	\$ 63,144	\$ 93,468	1.9%	\$ 95,244	5/1/2021	5/1/2022	2.00%
7	County of San Bernardino	Real Property Agent III	\$ 67,579	\$ 93,122	1.9%	\$ 94,891	7/31/2021	7/30/2022	3.00%
8	County of San Diego	Senior Real Property Agent	\$ 84,656	\$ 94,328		\$ 94,328	6/18/2021	unknown	unknown
9	County of Ventura	Senior Real Property Agent	\$ 69,896	\$ 93,446	-0.7%	\$ 92,792	12/27/2020	12/26/2021	2.00%
10	County of Kern	Real Property Agent III	\$ 56,892	\$ 69,456	1.2%	\$ 70,289	4/21/2021	unknown	unknown
11	County of Alameda	N/C							
12	County of Fresno	N/C							
13	County of Sacramento	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 108,874	\$ 96,789
% County of San Diego Above/Below	-15.4%	-2.6%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Revenue & Recovery Officer									
1	City and County of San Francisco	Collection Supervisor	\$ 82,810	\$ 100,646	-17.4%	\$ 83,134	7/1/2021	1/8/2022	.50%
2	County of Alameda	Collection Supervisor I	\$ 76,918	\$ 93,475	-11.4%	\$ 82,819	12/27/2020	12/26/2021	3.00%
3	County of San Mateo ¹	[Lead Revenue Collector/Revenue Collection Supervisor]	\$ 77,728	\$ 97,134	-17.5%	\$ 80,136	10/4/2020	unknown	unknown
4	County of Sacramento	Collection Services Supervisor	\$ 60,531	\$ 73,581	0.1%	\$ 73,655	6/21/2020	unknown	unknown
5	County of Contra Costa	Collection Enforcement Supervisor I	\$ 68,064	\$ 82,732	-11.1%	\$ 73,549	7/1/2021	unknown	unknown
6	County of Santa Clara	Senior Revenue Collections Officer	\$ 72,238	\$ 87,360	-16.8%	\$ 72,684	6/14/2021	6/13/2022	3.00%
7	County of San Bernardino	Supervising Collections Officer	\$ 50,440	\$ 69,389	1.9%	\$ 70,707	7/31/2021	7/30/2022	3.00%
9	County of Los Angeles	Supervising Delinquent Accounts Investigator	\$ 49,887	\$ 67,225	-3.8%	\$ 64,671	1/1/2021	unknown	unknown
10	County of Fresno	Collections Supervisor	\$ 47,710	\$ 57,980	4.7%	\$ 60,705	4/19/2021	unknown	unknown
11	County of Kern	N/C							
12	County of Orange	N/C							
13	County of Riverside	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 82,732	\$ 73,549
% County of San Diego Above/Below	-19.3%	-6.0%
Number of Matches	9	9

N/C - Non Comparator

1 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Storekeeper									
1	County of Santa Clara	Supervising Materials Supply Specialist	\$ 76,685	\$ 93,186	-16.8%	\$ 77,531	6/28/2021	6/27/2022	3.00%
2	County of Contra Costa	Supply and Distribution Supervisor	\$ 67,527	\$ 82,079	-11.1%	\$ 72,968	7/1/2021	unknown	unknown
3	County of San Mateo	Storekeeping Supervisor	\$ 64,271	\$ 80,370	-17.5%	\$ 66,305	10/4/2020	unknown	unknown
4	County of Orange	Senior Storekeeper	\$ 49,650	\$ 66,518	-2.0%	\$ 65,188	7/2/2021	7/1/2022	3.50%
5	City and County of San Francisco	Senior Storekeeper	\$ 64,662	\$ 78,650	-17.4%	\$ 64,965	7/1/2021	1/8/2022	.50%
6	County of Los Angeles	Warehouse Worker III	\$ 47,724	\$ 64,308	-3.8%	\$ 61,864	1/1/2021	unknown	unknown
7	County of Ventura	Warehouse Supervisor	\$ 43,975	\$ 61,570	-0.7%	\$ 61,139	12/26/2020	12/27/2021	2.00%
8	County of Sacramento	Storekeeper II	\$ 49,193	\$ 59,800	0.1%	\$ 59,860	6/21/2020	unknown	unknown
10	County of Alameda	Storekeeper I	\$ 51,623	\$ 61,770	-11.4%	\$ 54,728	6/27/2021	6/26/2022	3.25%
11	County of Fresno	Supervising Stock Clerk	\$ 39,260	\$ 50,232	4.7%	\$ 52,593	11/2/2020	unknown	unknown
12	County of San Bernardino	Stores Supervisor I	\$ 34,133	\$ 46,966	1.9%	\$ 47,859	7/31/2021	7/30/2022	3.00%
13	County of Kern	Storekeeper II	\$ 34,212	\$ 41,760	1.2%	\$ 42,261	4/21/2021	unknown	unknown
14	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 63,039	\$ 61,502
% County of San Diego Above/Below	-12.0%	-9.2%
Number of Matches	12	12

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Structural Engineer									
1	City and County of San Francisco	Senior Structural Engineer	\$ 180,804	\$ 219,726	-17.4%	\$ 181,494	7/1/2021	1/8/2022	.50%
2	County of Los Angeles	Senior Structural Engineer	\$ 132,440	\$ 169,062	-3.8%	\$ 162,637	1/1/2021	unknown	unknown
3	County of Orange	Senior Civil Engineer	\$ 107,619	\$ 145,142	-2.0%	\$ 142,240	7/2/2021	7/1/2022	3.50%
4	County of Sacramento	Senior Civil Engineer	\$ 125,718	\$ 138,601	0.1%	\$ 138,740	6/21/2020	unknown	unknown
5	County of Ventura	Senior Plan Check Engineer	\$ 98,614	\$ 138,059	-0.7%	\$ 137,093	unknown	unknown	unknown
6	County of Santa Clara	Senior Plan Check Engineer	\$ 114,887	\$ 163,966	-16.8%	\$ 136,420	10/21/2020	10/20/2021	3.00%
8	County of San Bernardino	Supervising Engineer	\$ 95,222	\$ 131,290	1.9%	\$ 133,784	7/31/2021	7/30/2022	3.00%
9	County of Contra Costa	Principal Structural Engineer	\$ 113,449	\$ 137,898	-11.1%	\$ 122,591	7/1/2021	unknown	unknown
10	County of Fresno ¹	[Building Plans Engineer / Supervising Engineer]	\$ 90,935	\$ 110,526	4.7%	\$ 115,721	4/19/2021	unknown	unknown
11	County of Alameda	N/C							
12	County of Kern	N/C							
13	County of Riverside	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 138,601	\$ 137,093
% County of San Diego Above/Below	-2.1%	-1.0%
Number of Matches	9	9

N/C - Non Comparator

1 - County of Fresno: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Tax Payment Enforcement Officer									
1	City and County of San Francisco	Senior Investigator, Tax Collector	\$ 96,512	\$ 117,364	-17.4%	\$ 96,943	7/1/2021	1/8/2022	.50%
2	County of San Mateo	Revenue Collection Supervisor	\$ 84,093	\$ 105,080	-17.5%	\$ 86,691	10/4/2020	unknown	unknown
3	County of Alameda	Collection Supervisor I	\$ 76,918	\$ 93,475	-11.4%	\$ 82,819	12/27/2020	12/26/2021	3.00%
5	County of Riverside	Senior Tax Enforcement Investigator	\$ 51,912	\$ 76,824	1.9%	\$ 78,284	5/1/2021	5/1/2022	2.00%
6	County of Sacramento	Collection Services Supervisor	\$ 60,531	\$ 73,581	0.1%	\$ 73,655	6/21/2020	unknown	unknown
7	County of Contra Costa	Tax Compliance Officer - Advanced	\$ 58,892	\$ 71,583	-11.1%	\$ 63,637	7/1/2021	unknown	unknown
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Los Angeles	N/C							
11	County of Orange	N/C							
12	County of San Bernardino	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 85,150	\$ 80,551
% County of San Diego Above/Below	-7.6%	-1.8%
Number of Matches	6	6

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Tax Payment Processor									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Diego	Senior Tax Payment Processor	\$ 43,722	\$ 53,747		\$ 53,747	6/18/2021	unknown	unknown
2	County of Kern	Fiscal Support Specialist	\$ 39,144	\$ 47,784	1.2%	\$ 48,357	4/21/2021	unknown	unknown
3	City and County of San Francisco	N/C							
4	County of Alameda	N/C							
5	County of Contra Costa	N/C							
6	County of Fresno	N/C							
7	County of Los Angeles	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results		
	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 47,784	\$ 48,357
% County of San Diego Above/Below	11.1%	10.0%
Number of Matches	1	1

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Treasurer-Tax Collector Specialist									
1	County of San Mateo	Senior Cash Management Specialist	\$ 65,144	\$ 81,430	-17.5%	\$ 67,180	10/4/2020	unknown	unknown
2	County of Alameda	Treasurer-Tax Collector's Specialist III	\$ 60,039	\$ 71,052	-11.4%	\$ 62,952	6/27/2021	6/26/2022	3.25%
3	County of Los Angeles	Tax Services Specialist	\$ 44,799	\$ 61,981	-3.8%	\$ 59,626	1/1/2021	unknown	unknown
4	County of Contra Costa	Account Clerk - Advanced Level	\$ 49,796	\$ 63,592	-11.1%	\$ 56,533	7/1/2021	unknown	unknown
6	City and County of San Francisco	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 67,322	\$ 61,289
% County of San Diego Above/Below	-25.9%	-14.7%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Vector Control Technician									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Vector Control Technician III	\$ 75,504	\$ 91,266	-16.8%	\$ 75,934	6/14/2021	6/13/2022	3.00%
2	County of Alameda	Senior Vector Control Officer	\$ 70,506	\$ 84,036	-11.4%	\$ 74,455	6/27/2021	6/26/2022	3.25%
3	County of San Diego	Senior Vector Control Technician	\$ 55,266	\$ 67,954		\$ 67,954	6/18/2021	unknown	unknown
4	County of San Bernardino	Vector Control Technician II	\$ 46,904	\$ 64,501	1.9%	\$ 65,726	7/31/2021	7/30/2022	3.00%
5	County of Riverside	Environmental Health Technician II	\$ 38,982	\$ 60,876	1.9%	\$ 62,032	5/1/2021	5/1/2022	2.00%
6	City and County of San Francisco	N/C							
7	County of Contra Costa	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Los Angeles	N/C							
11	County of Orange	N/C							
12	County of Sacramento	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 74,268	\$ 70,091
% County of San Diego Above/Below	-9.3%	-3.1%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Vector Ecologist									
2	County of Santa Clara	Vector Control Ecologist	\$ 92,991	\$ 112,522	-16.8%	\$ 93,618	6/14/2021	6/13/2022	3.00%
3	County of Alameda	Senior Vector Control Biologist	\$ 82,446	\$ 100,250	-11.4%	\$ 88,821	6/27/2021	6/26/2022	3.25%
4	City and County of San Francisco	N/C							
5	County of Contra Costa	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Los Angeles	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 106,386	\$ 91,220
% County of San Diego Above/Below	-6.1%	9.1%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Senior Veteran Services Representative									
1	City and County of San Francisco ¹	[Veterans Claims Representative/ Veterans Claims Representative Supervisor]	\$ 92,832	\$ 112,854	-17.4%	\$ 93,217	7/1/2021	1/8/2022	.50%
2	County of Contra Costa ²	[Veterans Service Representative II/Veterans' Services Manager]	\$ 75,559	\$ 91,842	-11.1%	\$ 81,648	7/1/2021	unknown	unknown
3	County of Riverside	Senior Veteran Services Representative	\$ 54,696	\$ 73,296	1.9%	\$ 74,689	5/1/2021	5/1/2022	2.00%
5	County of Los Angeles	Veterans Claims Assistant III	\$ 55,057	\$ 74,197	-3.8%	\$ 71,378	1/1/2021	unknown	unknown
6	County of Sacramento	Senior Veterans Claims Representative	\$ 52,597	\$ 63,935	0.1%	\$ 63,999	6/21/2020	unknown	unknown
7	County of Kern	Veterans Service Representative II	\$ 45,456	\$ 55,500	1.2%	\$ 56,166	4/21/2021	unknown	unknown
8	County of Alameda	N/C							
9	County of Fresno	N/C							
10	County of Orange	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 73,747	\$ 73,033
% County of San Diego Above/Below	0.2%	1.1%
Number of Matches	6	6

N/C - Non Comparator

1 - City and County of San Francisco: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

2 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sewing Room Supervisor									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Los Angeles	Head Sewing Worker	\$ 40,448	\$ 54,382	-3.8%	\$ 52,315	1/1/2021	unknown	unknown
2	County of San Diego	Sewing Room Supervisor	\$ 34,403	\$ 38,397		\$ 38,397	6/18/2021	unknown	unknown
3	City and County of San Francisco	N/C							
4	County of Alameda	N/C							
5	County of Contra Costa	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results		Top Annual	Adjusted Top Annual
Median of Comparators		\$ 54,382	\$ 52,315
% County of San Diego Above/Below		-41.6%	-36.2%
Number of Matches		1	1

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Commissary Stores Supervisor									
2	City and County of San Francisco	N/C							
3	County of Alameda	N/C							
4	County of Contra Costa	N/C							
5	County of Fresno	N/C							
6	County of Kern	N/C							
7	County of Los Angeles	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	N/A	N/A
% County of San Diego Above/Below	N/A	N/A
Number of Matches	0	0

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Communications Dispatcher									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Communications Dispatcher II	\$ 67,990	\$ 82,602	-17.4%	\$ 68,229	7/1/2021	1/8/2022	.50%
2	County of San Mateo	911 Communications Calltaker	\$ 60,652	\$ 75,794	-17.5%	\$ 62,530	10/4/2020	unknown	unknown
3	County of San Bernardino	Sheriff's Communication Dispatcher I	\$ 40,082	\$ 55,016	1.9%	\$ 56,061	7/31/2021	7/30/2022	3.00%
4	County of Los Angeles	Dispatcher II	\$ 40,350	\$ 54,249	-3.8%	\$ 52,187	1/1/2021	unknown	unknown
5	County of Kern	Sheriff's Dispatcher I	\$ 42,180	\$ 51,492	1.2%	\$ 52,110	4/21/2021	unknown	unknown
6	County of San Diego	Sheriff s Communications Dispatcher	\$ 40,914	\$ 50,232		\$ 50,232	6/18/2021	unknown	unknown
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Orange	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 55,016	\$ 56,061
% County of San Diego Above/Below	-9.5%	-11.6%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Detentions Licensed Vocational Nurse									
1	County of San Mateo ¹	Licensed Vocational Nurse	\$ 71,114	\$ 84,093	-17.5%	\$ 69,377	10/4/2020	unknown	unknown
2	County of Contra Costa	Licensed Vocational Nurse	\$ 57,999	\$ 74,067	-11.1%	\$ 65,845	7/1/2021	unknown	unknown
3	County of Sacramento	Licensed Vocational Nurse D/CF	\$ 50,718	\$ 61,638	0.1%	\$ 61,700	6/21/2020	unknown	unknown
5	County of San Bernardino	Licensed Vocational Nurse II - Corrections	\$ 41,454	\$ 57,075	1.9%	\$ 58,160	7/31/2021	7/30/2022	3.00%
6	County of Fresno	Licensed Vocational Nurse II	\$ 42,822	\$ 54,756	4.7%	\$ 57,330	11/2/2020	unknown	unknown
7	County of Riverside	Licensed Vocational Nurse - Adult Detention	\$ 36,465	\$ 53,882	1.9%	\$ 54,906	5/1/2021	5/1/2022	2.00%
8	County of Orange	Licensed Vocational Nurse	\$ 41,080	\$ 54,974	-2.0%	\$ 53,875	7/2/2021	7/1/2022	3.50%
9	County of Kern	Correctional Vocational Nurse II	\$ 42,180	\$ 51,492	1.2%	\$ 52,110	4/21/2021	unknown	unknown
10	City and County of San Francisco	N/C							
11	County of Alameda	N/C							
12	County of Los Angeles	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 56,025	\$ 57,745
% County of San Diego Above/Below	7.4%	4.6%
Number of Matches	8	8

N/C - Non Comparator

1 - County of San Mateo: Bottom of range is step 2.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Detentions Nurse									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Contra Costa	Registered Nurse	\$ 124,777	\$ 155,829	-11.1%	\$ 138,532	1/1/2021	unknown	unknown
2	County of Los Angeles	Registered Nurse II, Sheriff	\$ 85,408	\$ 127,845	-3.8%	\$ 122,987	1/1/2021	unknown	unknown
3	County of San Mateo ¹	Correctional Health Nurse	\$ 123,737	\$ 146,242	-17.5%	\$ 120,650	2/7/2021	unknown	unknown
4	County of Riverside	Institutional Nurse	\$ 81,677	\$ 113,970	1.9%	\$ 116,135	5/1/2021	5/1/2022	2.00%
5	County of San Diego	Sheriff s Detentions Nurse	\$ 83,616	\$ 113,360		\$ 113,360	6/18/2021	unknown	unknown
6	County of San Bernardino	Correctional Nurse II	\$ 80,766	\$ 109,928	1.9%	\$ 112,017	8/15/2020	unknown	unknown
7	County of Sacramento	Registered Nurse D/CF II	\$ 80,659	\$ 98,052	0.1%	\$ 98,150	8/2/2020	unknown	unknown
8	County of Kern	Correctional Staff Nurse II	\$ 78,684	\$ 96,060	1.2%	\$ 97,213	4/21/2021	unknown	unknown
9	County of Orange	Staff Nurse	\$ 62,712	\$ 84,469	-2.0%	\$ 82,779	7/2/2021	7/1/2022	3.50%
10	City and County of San Francisco	N/C							
11	County of Alameda	N/C							
12	County of Fresno	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 111,949	\$ 114,076
% County of San Diego Above/Below	1.2%	-0.6%
Number of Matches	8	8

N/C - Non Comparator

1 - County of San Mateo: Bottom of range is step 2.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Detentions Supervising Nurse									
1	County of Riverside	Supervising Institutional Nurse	\$ 96,579	\$ 135,870	1.9%	\$ 138,452	5/1/2021	5/1/2022	2.00%
2	County of Los Angeles	Supervising Staff Nurses I, Sheriff	\$ 96,127	\$ 143,891	-3.8%	\$ 138,423	1/1/2021	unknown	unknown
4	County of San Bernardino	Supervising Correctional Nurse I	\$ 89,710	\$ 123,510	1.9%	\$ 125,857	7/31/2021	7/30/2022	3.00%
5	County of Sacramento	Supervising Registered Nurse D/CF	\$ 90,348	\$ 109,787	0.1%	\$ 109,897	6/21/2020	unknown	unknown
6	City and County of San Francisco	N/C							
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of Orange	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 129,690	\$ 132,140
% County of San Diego Above/Below	3.1%	1.2%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Detentions, Chief Mental Health Clinician									
1	County of Riverside	Behavioral Health Services Supervisor - Detention	\$ 73,631	\$ 106,214	1.9%	\$ 108,232	5/1/2021	5/1/2022	2.00%
3	City and County of San Francisco	N/C							
4	County of Alameda	N/C							
5	County of Contra Costa	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Los Angeles	N/C							
9	County of Orange	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 106,214	\$ 108,232
% County of San Diego Above/Below	-0.2%	-2.1%
Number of Matches	1	1

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Detentions, Mental Health Clinician									
1	County of Kern	Clinical Psychologist II	\$ 88,248	\$ 107,724	1.2%	\$ 109,017	4/21/2021	unknown	unknown
3	County of Los Angeles	Mental Health Clinician II	\$ 98,758	\$ 98,758	-3.8%	\$ 95,005	1/1/2021	unknown	unknown
4	County of Riverside	Clinical Therapist II – Detention	\$ 58,002	\$ 92,993	1.9%	\$ 94,760	5/1/2021	5/1/2022	2.00%
5	County of Alameda	Behavioral Health Clinician II	\$ 88,729	\$ 102,259	-11.4%	\$ 90,602	6/27/2021	6/26/2022	3.25%
6	County of Orange	Behavioral Health Clinician II	\$ 64,813	\$ 87,381	-2.0%	\$ 85,633	7/2/2021	7/1/2022	3.50%
7	City and County of San Francisco	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 98,758	\$ 94,760
% County of San Diego Above/Below	0.3%	4.3%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Detentions, Processing Assistant Manager									
2	City and County of San Francisco	N/C							
3	County of Alameda	N/C							
4	County of Contra Costa	N/C							
5	County of Fresno	N/C							
6	County of Kern	N/C							
7	County of Los Angeles	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	N/A	N/A
% County of San Diego Above/Below	N/A	N/A
Number of Matches	0	0

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Emergency Services Dispatcher									
1	County of Santa Clara	Communications Dispatcher III	\$ 99,461	\$ 120,338	-16.8%	\$ 100,122	6/14/2021	6/13/2022	3.00%
2	City and County of San Francisco	Public Safety Communications Dispatcher	\$ 95,992	\$ 116,688	-17.4%	\$ 96,384	7/1/2021	1/8/2022	.50%
3	County of Ventura	Sheriff's Technical Communications Specialist II	\$ 63,974	\$ 89,563	-0.7%	\$ 88,936	8/9/2020	unknown	unknown
4	County of Sacramento	Sheriff's Communication Dispatcher II	\$ 72,391	\$ 87,988	0.1%	\$ 88,076	6/20/2021	1/2/2022	1.00%
5	County of Riverside	Sheriff's 911 Communications Officer II B	\$ 52,146	\$ 85,940	1.9%	\$ 87,573	5/1/2021	5/1/2022	2.00%
6	County of San Mateo	Communications Dispatcher II	\$ 83,760	\$ 104,768	-17.5%	\$ 86,433	10/4/2020	unknown	unknown
7	County of Orange	Radio Dispatcher	\$ 64,813	\$ 87,381	-2.0%	\$ 85,633	7/2/2021	7/1/2022	3.50%
8	County of Alameda	Emergency Services Dispatcher II	\$ 79,955	\$ 96,170	-11.4%	\$ 85,206	6/27/2021	6/26/2022	3.25%
9	County of Contra Costa	Sheriff's Dispatcher II	\$ 78,922	\$ 93,646	-11.1%	\$ 83,252	7/1/2021	7/1/2022	5.00%
11	County of Los Angeles	Public Response Dispatcher II	\$ 57,133	\$ 76,993	-3.8%	\$ 74,067	1/1/2021	unknown	unknown
12	County of San Bernardino	Sheriff's Communication Dispatcher II	\$ 52,666	\$ 72,301	1.9%	\$ 73,675	7/31/2021	7/30/2022	3.00%
13	County of Fresno	Communications Dispatcher II	\$ 47,606	\$ 60,918	4.7%	\$ 63,781	7/1/2019	unknown	unknown
14	County of Kern	Sheriff's Dispatcher II	\$ 46,608	\$ 56,892	1.2%	\$ 57,575	4/21/2021	unknown	unknown

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 87,988	\$ 85,633
% County of San Diego Above/Below	-14.3%	-11.3%
Number of Matches	13	13

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Emergency Services Dispatcher Trainee									
1	County of Ventura	Sheriff's Technical Communications Specialist I	\$ 61,040	\$ 85,456	-0.7%	\$ 84,858	8/9/2020	unknown	unknown
2	County of Sacramento	Sheriff's Communication Dispatcher I	\$ 65,814	\$ 79,991	0.1%	\$ 80,071	6/20/2021	1/2/2022	1.00%
3	County of Santa Clara	Communications Dispatcher I	\$ 79,088	\$ 95,634	-16.8%	\$ 79,568	6/14/2021	6/13/2022	3.00%
4	County of Alameda	Emergency Services Dispatcher I	\$ 67,069	\$ 80,234	-11.4%	\$ 71,088	6/27/2021	6/26/2022	3.25%
5	County of Orange	Radio Dispatcher Trainee	\$ 53,622	\$ 72,280	-2.0%	\$ 70,834	7/2/2021	7/1/2022	3.50%
6	County of Contra Costa	Sheriff's Dispatcher I	\$ 72,051	\$ 79,436	-11.1%	\$ 70,619	7/1/2021	7/1/2022	5.00%
7	County of San Mateo ¹	Communications Dispatcher I	\$ 75,794	\$ 84,717	-17.5%	\$ 69,891	10/4/2020	unknown	unknown
8	County of Riverside	Sheriff's 911 Communications Officer I	\$ 40,909	\$ 67,399	1.9%	\$ 68,679	5/1/2021	5/1/2022	2.00%
9	County of Los Angeles	Public Response Dispatcher I	\$ 48,556	\$ 65,431	-3.8%	\$ 62,944	1/1/2021	unknown	unknown
10	County of Fresno	Communications Dispatcher I	\$ 44,148	\$ 56,472	4.7%	\$ 59,126	7/1/2019	unknown	unknown
11	County of San Bernardino	Sheriff's Communication Dispatcher II Trainee	\$ 41,454	\$ 55,640	1.9%	\$ 56,697	7/31/2021	7/30/2022	3.00%
12	County of Kern	Sheriff's Dispatch Assistant	\$ 40,128	\$ 48,984	1.2%	\$ 49,572	4/21/2021	unknown	unknown
14	City and County of San Francisco	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 75,858	\$ 70,255
% County of San Diego Above/Below	-61.0%	-49.1%
Number of Matches	12	12

N/C - Non Comparator

1 - County of San Mateo: Bottom of range is step 3.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Fingerprint Examiner									
1	County of Riverside	Fingerprint Examiner II	\$ 58,320	\$ 91,164	1.9%	\$ 92,896	5/1/2021	5/1/2022	2.00%
2	County of Santa Clara	Latent Fingerprint Examiner II	\$ 92,115	\$ 111,457	-16.8%	\$ 92,732	6/14/2021	6/13/2022	3.00%
3	County of Contra Costa	Fingerprint Technician II	\$ 73,856	\$ 92,017	-11.1%	\$ 81,803	7/1/2021	7/1/2022	5.00%
4	County of Orange	Forensic Specialist	\$ 61,402	\$ 82,763	-2.0%	\$ 81,108	7/2/2021	7/1/2022	3.50%
5	County of San Bernardino	Fingerprint Examiner II	\$ 53,914	\$ 74,090	1.9%	\$ 75,497	7/31/2021	7/30/2022	3.00%
6	County of Los Angeles	Automated Fingerprint Identification System Technician II	\$ 55,057	\$ 74,197	-3.8%	\$ 71,378	1/1/2021	unknown	unknown
7	City and County of San Francisco	Fingerprint Technician II	\$ 68,952	\$ 83,746	-17.4%	\$ 69,174	7/1/2021	1/8/2022	.50%
8	County of San Mateo	Sheriff's Identification Technician	\$ 66,184	\$ 82,762	-17.5%	\$ 68,278	12/13/2020	12/12/2021	2-4%
9	County of Alameda	Fingerprint Examiner	\$ 58,715	\$ 69,830	-11.4%	\$ 61,869	6/27/2021	6/26/2022	3.25%
11	County of Fresno	N/C							
12	County of Kern	N/C							
13	County of Sacramento	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 82,763	\$ 75,497
% County of San Diego Above/Below	-54.6%	-41.0%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Investigative Specialist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Los Angeles	Civilian Investigator	\$ 67,884	\$ 91,488	-3.8%	\$ 88,011	1/1/2021	unknown	unknown
2	County of Orange	Investigative Assistant - Sheriff	\$ 49,358	\$ 65,936	-2.0%	\$ 64,617	7/2/2021	7/1/2022	3.50%
3	County of San Diego	Sheriff's Investigative Specialist	\$ 49,899	\$ 61,339		\$ 61,339	6/18/2021	unknown	unknown
4	County of Ventura	Investigative Assistant II	\$ 38,366	\$ 53,899	-0.7%	\$ 53,521	12/26/2020	12/27/2021	2.00%
5	City and County of San Francisco	N/C							
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 65,936	\$ 64,617
% County of San Diego Above/Below	-7.5%	-5.3%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Licensing Clerk I									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Orange	Permit Technician Trainee	\$ 44,366	\$ 59,738	-2.0%	\$ 58,543	7/2/2021	7/1/2022	3.50%
2	County of Los Angeles	Sheriff Station Clerk I	\$ 42,462	\$ 52,665	-3.8%	\$ 50,664	1/1/2021	unknown	unknown
3	County of San Diego	Sheriff s Licensing Clerk I	\$ 35,173	\$ 43,160		\$ 43,160	6/18/2021	unknown	unknown
4	City and County of San Francisco	N/C							
5	County of Alameda	N/C							
6	County of Contra Costa	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 56,201	\$ 54,603
% County of San Diego Above/Below	-30.2%	-26.5%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Licensing Clerk II									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Orange	Permit Technician	\$ 56,597	\$ 76,274	-2.0%	\$ 74,748	7/2/2021	7/1/2022	3.50%
2	County of Los Angeles	Sheriff Station Clerk II	\$ 43,190	\$ 59,725	-3.8%	\$ 57,456	1/1/2021	unknown	unknown
3	County of Santa Clara	Law Enforcement Clerk	\$ 54,207	\$ 65,453	-16.8%	\$ 54,457	6/14/2021	6/13/2022	3.00%
4	County of San Diego	Sheriff s Licensing Clerk II	\$ 39,624	\$ 48,714		\$ 48,714	6/18/2021	unknown	unknown
5	City and County of San Francisco	N/C							
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 65,453	\$ 57,456
% County of San Diego Above/Below	-34.4%	-17.9%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Licensing Specialist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Orange	Senior Permit Technician	\$ 64,813	\$ 87,381	-2.0%	\$ 85,633	7/2/2021	7/1/2022	3.50%
2	County of San Diego	Sheriff's Licensing Specialist	\$ 42,890	\$ 52,686		\$ 52,686	6/18/2021	unknown	unknown
3	City and County of San Francisco	N/C							
4	County of Alameda	N/C							
5	County of Contra Costa	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Los Angeles	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 87,381	\$ 85,633
% County of San Diego Above/Below	-65.9%	-62.5%
Number of Matches	1	1

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Licensing Supervisor									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Los Angeles	Supervising Sheriff Station Clerk	\$ 52,146	\$ 72,213	-3.8%	\$ 69,469	1/1/2021	unknown	unknown
2	County of San Diego	Sheriff's Licensing Supervisor	\$ 44,304	\$ 54,538		\$ 54,538	6/18/2021	unknown	unknown
3	City and County of San Francisco	N/C							
4	County of Alameda	N/C							
5	County of Contra Costa	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results		
	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 72,213	\$ 69,469
% County of San Diego Above/Below	-32.4%	-27.4%
Number of Matches	1	1

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Operations Supervisor									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Diego	Sheriff's Operations Supervisor	\$ 59,800	\$ 73,445		\$ 73,445	6/18/2021	unknown	unknown
2	County of Los Angeles	Supervising Sheriff Station Clerk	\$ 52,146	\$ 72,213	-3.8%	\$ 69,469	1/1/2021	unknown	unknown
3	City and County of San Francisco	N/C							
4	County of Alameda	N/C							
5	County of Contra Costa	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 72,213	\$ 69,469
% County of San Diego Above/Below	1.7%	5.4%
Number of Matches	1	1

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Property & Evidence Custodian									
1	County of San Mateo	Sheriff's Property Officer II	\$ 69,970	\$ 87,462	-17.5%	\$ 72,156	12/13/2020	12/12/2021	2-4%
3	City and County of San Francisco	N/C							
4	County of Alameda	N/C							
5	County of Contra Costa	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Los Angeles	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 87,462	\$ 72,156
% County of San Diego Above/Below	-48.1%	-22.1%
Number of Matches	1	1

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Property & Evidence Manager									
1	County of San Mateo	Sheriff's Property Manager	\$ 109,926	\$ 137,444	-17.5%	\$ 113,391	12/13/2020	unknown	unknown
2	County of Contra Costa ¹	[Sheriff's Specialist/Sheriff's Director of Property and Evidence]	\$ 80,123	\$ 98,380	-11.1%	\$ 87,460	7/1/2021	unknown	unknown
4	County of Los Angeles	Supervising Evidence and Property Custodian, Sheriff	\$ 54,515	\$ 75,488	-3.8%	\$ 72,619	1/1/2021	unknown	unknown
5	City and County of San Francisco	N/C							
6	County of Alameda	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 98,380	\$ 87,460
% County of San Diego Above/Below	-34.1%	-19.2%
Number of Matches	3	3

N/C - Non Comparator

1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Property & Evidence Specialist I									
1	County of Contra Costa	Sheriff's Aide	\$ 55,258	\$ 68,846	-11.1%	\$ 61,204	7/1/2021	7/1/2022	5.00%
2	County of San Mateo	Sheriff's Property Officer I	\$ 58,405	\$ 73,007	-17.5%	\$ 60,230	12/13/2020	12/12/2021	2-4%
3	County of Fresno	Property & Evidence Technician I	\$ 43,238	\$ 55,354	4.7%	\$ 57,956	7/1/2019	unknown	unknown
4	County of Los Angeles	Evidence and Property Custodian I, Sheriff	\$ 39,469	\$ 54,515	-3.8%	\$ 52,443	1/1/2021	unknown	unknown
6	City and County of San Francisco	N/C							
7	County of Alameda	N/C							
8	County of Kern	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 62,100	\$ 59,093
% County of San Diego Above/Below	-44.4%	-37.4%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Property & Evidence Specialist II									
1	County of Contra Costa	Sheriff's Specialist	\$ 65,129	\$ 81,144	-11.1%	\$ 72,137	7/1/2021	7/1/2022	5.00%
2	County of Orange	Sheriff's Correctional Services Assistant	\$ 52,250	\$ 69,971	-2.0%	\$ 68,572	7/2/2021	7/1/2022	3.50%
3	County of Fresno	Property & Evidence Technician II	\$ 50,024	\$ 63,986	4.7%	\$ 66,993	7/1/2019	unknown	unknown
4	County of Alameda	Sheriff's Technician	\$ 59,854	\$ 71,429	-11.4%	\$ 63,286	6/27/2021	6/26/2022	3.25%
5	City and County of San Francisco	Sheriffs Property Keeper	\$ 62,192	\$ 75,634	-17.4%	\$ 62,474	7/1/2021	1/8/2022	.50%
6	County of Los Angeles	Evidence and Property Custodian II, Sheriff	\$ 46,353	\$ 64,152	-3.8%	\$ 61,714	1/1/2021	unknown	unknown
7	County of Santa Clara	Sheriff's Technician	\$ 54,991	\$ 66,425	-16.8%	\$ 55,265	6/14/2021	6/13/2022	3.00%
9	County of Kern	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 69,971	\$ 63,286
% County of San Diego Above/Below	-41.3%	-27.8%
Number of Matches	7	7

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Property Investigator									
2	City and County of San Francisco	N/C							
3	County of Alameda	N/C							
4	County of Contra Costa	N/C							
5	County of Fresno	N/C							
6	County of Kern	N/C							
7	County of Los Angeles	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	N/A	N/A
% County of San Diego Above/Below	N/A	N/A
Number of Matches	0	0

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Range Guard									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Riverside	Sheriff's Range Master	\$ 36,068	\$ 53,120	1.9%	\$ 54,129	5/1/2021	5/1/2022	2.00%
2	County of San Diego	Sheriff s Range Guard	\$ 37,419	\$ 45,947		\$ 45,947	6/18/2021	unknown	unknown
3	City and County of San Francisco	N/C							
4	County of Alameda	N/C							
5	County of Contra Costa	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Los Angeles	N/C							
9	County of Orange	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results		
	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 53,120	\$ 54,129
% County of San Diego Above/Below	-15.6%	-17.8%
Number of Matches	1	1

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Records & Identification Clerk I									
1	County of San Mateo	Sheriff's Criminal Records Technician I	\$ 52,727	\$ 65,893	-17.5%	\$ 54,362	10/4/2020	unknown	unknown
2	County of Fresno	Identification Technician I	\$ 38,428	\$ 49,166	4.7%	\$ 51,477	7/1/2019	unknown	unknown
3	County of Orange	Sheriff's Record Trainee	\$ 38,771	\$ 51,064	-2.0%	\$ 50,043	7/2/2021	7/1/2022	3.50%
4	County of Los Angeles	Records System Clerk I, Sheriff	\$ 37,593	\$ 51,886	-3.8%	\$ 49,914	1/1/2021	unknown	unknown
5	County of Ventura	Sheriff's Records Technician I	\$ 35,851	\$ 50,191	-0.7%	\$ 49,840	12/27/2020	12/26/2021	2.00%
6	County of Riverside	Sheriff's Records/Warrants Assistant I	\$ 30,838	\$ 48,156	1.9%	\$ 49,071	5/1/2021	5/1/2022	2.00%
7	County of San Bernardino	Sheriff's Records Clerk	\$ 33,779	\$ 46,363	1.9%	\$ 47,244	7/31/2021	7/30/2022	3.00%
8	County of Sacramento	Sheriff's Records Specialist I	\$ 37,438	\$ 45,518	0.1%	\$ 45,564	6/21/2020	unknown	unknown
9	County of Kern	Identification Technician I	\$ 36,324	\$ 44,340	1.2%	\$ 44,872	4/21/2021	unknown	unknown
11	City and County of San Francisco	N/C							
12	County of Alameda	N/C							
13	County of Contra Costa	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 49,166	\$ 49,840
% County of San Diego Above/Below	-13.9%	-15.5%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Records & Identification Clerk II									
1	County of Santa Clara	Law Enforcement Records Technician	\$ 63,180	\$ 76,336	-16.8%	\$ 63,512	6/14/2021	6/13/2022	3.00%
2	County of Fresno	Identification Technician II	\$ 43,238	\$ 55,345	4.7%	\$ 57,946	7/1/2019	unknown	unknown
3	County of San Mateo	Sheriff's Criminal Records Technician II	\$ 55,785	\$ 69,762	-17.5%	\$ 57,554	10/4/2020	unknown	unknown
4	County of Los Angeles	Records System Clerk II, Sheriff	\$ 42,981	\$ 59,428	-3.8%	\$ 57,170	1/1/2021	unknown	unknown
5	County of Ventura	Sheriff's Records Technician II	\$ 40,584	\$ 56,818	-0.7%	\$ 56,420	12/27/2020	12/26/2021	2.00%
6	County of Riverside	Sheriff's Records/Warrants Assistant II	\$ 34,272	\$ 53,529	1.9%	\$ 54,547	5/1/2021	5/1/2022	2.00%
7	County of Orange	Sheriff's Record Technician	\$ 40,581	\$ 53,768	-2.0%	\$ 52,693	7/2/2021	7/1/2022	3.50%
8	County of Sacramento	Sheriff's Records Specialist II	\$ 42,031	\$ 51,114	0.1%	\$ 51,165	6/21/2020	unknown	unknown
10	County of Kern	Identification Technician I	\$ 36,324	\$ 44,340	1.2%	\$ 44,872	4/21/2021	unknown	unknown
11	City and County of San Francisco	N/C							
12	County of Alameda	N/C							
13	County of Contra Costa	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 55,345	\$ 56,420
% County of San Diego Above/Below	-13.6%	-15.8%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Records & Identification Supervisor

1	County of Santa Clara	Law Enforcement Records Supervisor	\$ 96,427	\$ 117,254	-16.8%	\$ 97,555	6/28/2021	6/27/2022	3.00%
2	County of San Mateo	Sheriff's Criminal Records Supervisor	\$ 73,131	\$ 91,435	-17.5%	\$ 75,434	10/4/2020	unknown	unknown
3	County of Riverside	Sheriff's Records/Warrants Supervisor A	\$ 43,487	\$ 67,836	1.9%	\$ 69,125	5/1/2021	5/1/2022	2.00%
4	County of Los Angeles	Supervising Records System Clerk, Sheriff	\$ 50,502	\$ 69,931	-3.8%	\$ 67,273	1/1/2021	unknown	unknown
5	County of Ventura	Sheriff's Records Supervisor I	\$ 46,900	\$ 65,660	-0.7%	\$ 65,200	12/26/2020	12/27/2021	2.00%
6	County of Sacramento	Sheriff's Records Supervisor	\$ 52,325	\$ 63,600	0.1%	\$ 63,664	6/20/2021	1/2/2022	1.00%
7	County of San Bernardino	Sheriff's Records Supervisor	\$ 44,658	\$ 61,464	1.9%	\$ 62,632	7/31/2021	7/30/2022	3.00%
9	City and County of San Francisco	N/C							
10	County of Alameda	N/C							
11	County of Contra Costa	N/C							
12	County of Fresno	N/C							
13	County of Kern	N/C							
14	County of Orange	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 67,836	\$ 67,273
% County of San Diego Above/Below	-22.4%	-21.4%
Number of Matches	7	7

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Senior Fingerprint Examiner									
1	County of Santa Clara	Latent Fingerprint Examiner III	\$ 103,653	\$ 125,409	-16.8%	\$ 104,341	6/14/2021	6/13/2022	3.00%
2	County of Orange	Senior Forensic Specialist	\$ 76,274	\$ 102,814	-2.0%	\$ 100,758	7/2/2021	7/1/2022	3.50%
3	County of Riverside	Supervising Fingerprint Examiner	\$ 59,968	\$ 98,777	1.9%	\$ 100,654	5/1/2021	5/1/2022	2.00%
4	County of Contra Costa	Supervising Fingerprint Technician	\$ 83,836	\$ 104,451	-11.1%	\$ 92,857	7/1/2021	7/1/2022	5.00%
5	County of Alameda	Identification Supervisor	\$ 80,288	\$ 97,178	-11.4%	\$ 86,099	11/1/2020	10/31/2021	2.00%
6	County of San Mateo	Supervising Sheriff's Identification Technician	\$ 76,210	\$ 95,221	-17.5%	\$ 78,557	12/13/2020	12/12/2021	2-4%
7	County of Los Angeles	Automated Fingerprint Identification System Operations Supervisor	\$ 58,128	\$ 78,331	-3.8%	\$ 75,354	1/1/2021	unknown	unknown
8	City and County of San Francisco	Fingerprint Technician III	\$ 74,152	\$ 90,142	-17.4%	\$ 74,457	7/1/2021	1/8/2022	.50%
10	County of Fresno	N/C							
11	County of Kern	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 97,977	\$ 89,478
% County of San Diego Above/Below	-53.9%	-40.6%
Number of Matches	8	8

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Sheriff's Supervisor Helicopter/Airplane Mechanic									
1	County of Ventura	Chief Helicopter Maintenance Technician	\$ 102,290	\$ 107,416	-0.7%	\$ 106,664	1/10/2021	1/9/2022	2.00%
3	County of Orange	Sheriff's Helicopter Mechanic - Inspector	\$ 72,301	\$ 97,469	-2.0%	\$ 95,519	7/2/2021	7/1/2022	3.50%
4	County of San Bernardino	Sheriff's Aviation Mechanic	\$ 64,480	\$ 88,608	1.9%	\$ 90,292	7/31/2021	7/30/2022	3.00%
5	County of Sacramento	Supervising Helicopter Mechanic	\$ 74,145	\$ 81,745	0.1%	\$ 81,827	6/21/2020	unknown	unknown
6	City and County of San Francisco	N/C							
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of Los Angeles	N/C							
12	County of Riverside	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 93,038	\$ 92,905
% County of San Diego Above/Below	10.7%	10.8%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Social Services Aide									
1	County of Santa Clara	Program Services Aide	\$ 67,469	\$ 81,559	-16.8%	\$ 67,857	6/14/2021	6/13/2022	3.00%
2	County of Alameda ¹	[Community Outreach Worker I/ Community Outreach Worker II]	\$ 53,801	\$ 64,672	-11.4%	\$ 57,299	6/27/2021	6/26/2022	3.25%
3	County of Los Angeles	Human Services Aide	\$ 41,041	\$ 55,194	-3.8%	\$ 53,096	1/1/2021	unknown	unknown
4	County of Ventura	HS Case Aide II	\$ 38,517	\$ 51,362	-0.7%	\$ 51,002	12/27/2020	12/26/2021	2.00%
5	County of Orange	Social Worker Assistant	\$ 38,626	\$ 51,397	-2.0%	\$ 50,369	7/2/2021	7/1/2022	3.50%
6	County of San Bernardino	Social Service Aide	\$ 33,322	\$ 45,802	1.9%	\$ 46,672	7/31/2021	7/30/2022	3.00%
7	County of Riverside	Social Service Assistant	\$ 30,028	\$ 44,364	1.9%	\$ 45,207	5/1/2021	5/1/2022	2.00%
8	County of Sacramento	Human Services Assistant	\$ 36,477	\$ 44,328	0.1%	\$ 44,372	6/21/2020	unknown	unknown
10	County of Fresno	Social Worker Aide II	\$ 29,692	\$ 36,842	4.7%	\$ 38,574	11/2/2020	unknown	unknown
11	City and County of San Francisco	N/C							
12	County of Contra Costa	N/C							
13	County of Kern	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 51,362	\$ 50,369
% County of San Diego Above/Below	-22.7%	-20.4%
Number of Matches	9	9

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is the same for both matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Social Work Supervisor									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Los Angeles	Supervising Children's Social Workers	\$ 83,516	\$ 112,548	-3.8%	\$ 108,271	1/1/2021	unknown	unknown
2	County of Alameda	Social Work Supervisor	\$ 97,032	\$ 116,771	-11.4%	\$ 103,459	12/27/2020	12/26/2021	3.00%
3	County of Santa Clara	Social Work Supervisor	\$ 102,667	\$ 124,326	-16.8%	\$ 103,439	6/14/2021	6/13/2022	3.00%
4	County of San Mateo	Social Work Supervisor	\$ 99,110	\$ 123,862	-17.5%	\$ 102,186	10/4/2020	unknown	unknown
5	County of Riverside	Social Services Supervisor II	\$ 60,713	\$ 94,788	1.9%	\$ 96,589	5/1/2021	5/1/2022	2.00%
6	City and County of San Francisco	Social Work Supervisor	\$ 91,442	\$ 111,150	-17.4%	\$ 91,810	7/1/2021	1/8/2022	.50%
7	County of Contra Costa	Social Work Supervisor I	\$ 80,548	\$ 97,895	-11.1%	\$ 87,029	7/1/2021	unknown	unknown
8	County of Fresno	Social Work Supervisor	\$ 64,350	\$ 82,290	4.7%	\$ 86,158	11/2/2020	unknown	unknown
9	County of Sacramento	Human Services Supervisor	\$ 69,468	\$ 84,439	0.1%	\$ 84,523	6/21/2020	unknown	unknown
10	County of Orange	Social Services Supervisor I	\$ 63,440	\$ 85,613	-2.0%	\$ 83,901	7/2/2021	7/1/2022	3.50%
11	County of San Bernardino	Supervising Social Worker	\$ 58,427	\$ 80,309	1.9%	\$ 81,835	7/31/2021	7/30/2022	3.00%
12	County of San Diego	Social Work Supervisor	\$ 63,606	\$ 78,146		\$ 78,146	6/18/2021	unknown	unknown
13	County of Kern	Social Service Supervisor I	\$ 58,332	\$ 71,208	1.2%	\$ 72,062	4/21/2021	unknown	unknown
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 96,342	\$ 89,419
% County of San Diego Above/Below	-23.3%	-14.4%
Number of Matches	12	12

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Social Worker I									
1	County of Contra Costa	Social Worker	\$ 69,561	\$ 84,551	-11.1%	\$ 75,166	7/1/2021	unknown	unknown
2	County of Santa Clara	Social Worker I	\$ 74,310	\$ 89,796	-16.8%	\$ 74,710	6/14/2021	6/13/2022	3.00%
3	County of Orange	Social Worker I	\$ 51,397	\$ 68,827	-2.0%	\$ 67,451	7/2/2021	7/1/2022	3.50%
4	County of Alameda	Social Worker I	\$ 63,522	\$ 75,743	-11.4%	\$ 67,108	6/27/2021	6/26/2022	3.25%
5	County of San Mateo ¹	Social Worker I	\$ 70,656	\$ 78,997	-17.5%	\$ 65,172	10/4/2020	unknown	unknown
6	County of Los Angeles	Children's Social Worker I	\$ 52,275	\$ 66,731	-3.8%	\$ 64,195	1/1/2021	unknown	unknown
7	County of San Bernardino	Social Worker II Trainee	\$ 42,536	\$ 57,075	1.9%	\$ 58,160	7/31/2021	7/30/2022	3.00%
8	County of Riverside	Social Services Practitioner I	\$ 37,842	\$ 55,944	1.9%	\$ 57,007	5/1/2021	5/1/2022	2.00%
9	County of Fresno	Social Worker I	\$ 40,820	\$ 52,234	4.7%	\$ 54,689	11/2/2020	unknown	unknown
11	County of Ventura	Social Worker I	\$ 36,887	\$ 51,622	-0.7%	\$ 51,260	12/26/2020	12/27/2021	2.00%
12	County of Kern	Social Service Worker I	\$ 39,924	\$ 48,744	1.2%	\$ 49,329	4/21/2021	unknown	unknown
13	City and County of San Francisco	N/C							
14	County of Sacramento	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 66,731	\$ 64,195
% County of San Diego Above/Below	-22.1%	-17.4%
Number of Matches	11	11

N/C - Non Comparator

1 - County of San Mateo: Bottom of range is step 3.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Social Worker II									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Social Worker II	\$ 81,827	\$ 99,045	-16.8%	\$ 82,406	6/14/2021	6/13/2022	3.00%
2	County of Contra Costa	Social Worker II	\$ 78,259	\$ 86,280	-11.1%	\$ 76,703	7/1/2021	unknown	unknown
3	County of Los Angeles	Children's Social Worker II	\$ 61,218	\$ 78,136	-3.8%	\$ 75,167	1/1/2021	unknown	unknown
4	County of San Mateo	Social Worker II	\$ 71,384	\$ 89,230	-17.5%	\$ 73,615	10/4/2020	unknown	unknown
5	County of Orange	Social Worker II	\$ 55,578	\$ 74,651	-2.0%	\$ 73,158	7/2/2021	7/1/2022	3.50%
6	County of Alameda	Social Worker II	\$ 69,159	\$ 82,307	-11.4%	\$ 72,924	6/27/2021	6/26/2022	3.25%
7	City and County of San Francisco	Social Worker	\$ 70,980	\$ 86,268	-17.4%	\$ 71,257	7/1/2021	1/8/2022	.50%
8	County of San Bernardino	Social Worker II	\$ 49,317	\$ 67,662	1.9%	\$ 68,948	7/31/2021	7/30/2022	3.00%
9	County of Riverside	Social Services Practitioner II	\$ 43,379	\$ 64,160	1.9%	\$ 65,379	5/1/2021	5/1/2022	2.00%
10	County of Fresno	Social Worker II	\$ 44,980	\$ 57,538	4.7%	\$ 60,242	11/2/2020	unknown	unknown
11	County of Ventura	Social Worker II	\$ 46,548	\$ 59,376	-0.7%	\$ 58,961	12/26/2020	12/27/2021	2.00%
12	County of San Diego	Social Worker II	\$ 46,717	\$ 57,491		\$ 57,491	6/18/2021	unknown	unknown
13	County of Kern	Social Service Worker II	\$ 41,976	\$ 51,240	1.2%	\$ 51,855	4/21/2021	unknown	unknown
14	County of Sacramento	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 76,394	\$ 72,091
% County of San Diego Above/Below	-32.9%	-25.4%
Number of Matches	12	12

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Social Worker III									
1	County of Los Angeles	Children's Social Worker III	\$ 66,896	\$ 100,478	-3.8%	\$ 96,660	1/1/2021	unknown	unknown
2	County of Santa Clara	Social Worker III	\$ 90,293	\$ 109,252	-16.8%	\$ 90,898	6/14/2021	6/13/2022	3.00%
3	County of Alameda ¹	[Social Worker III/ Social Work Supervisor]	\$ 84,776	\$ 101,666	-11.4%	\$ 90,076	12/27/2020	12/26/2021	3.00%
4	City and County of San Francisco	Social Work Specialist	\$ 87,540	\$ 106,416	-17.4%	\$ 87,900	7/1/2021	1/8/2022	.50%
5	County of San Mateo	Social Worker III	\$ 84,197	\$ 105,204	-17.5%	\$ 86,794	10/4/2020	unknown	unknown
6	County of Riverside	Social Services Practitioner III	\$ 53,476	\$ 83,439	1.9%	\$ 85,024	5/1/2021	5/1/2022	2.00%
7	County of Contra Costa ²	[Social Worker II/Social Work Supervisor I]	\$ 79,399	\$ 92,088	-11.1%	\$ 81,866	7/1/2021	unknown	unknown
8	County of Sacramento	Human Services Social Worker	\$ 60,322	\$ 73,310	0.1%	\$ 73,383	6/21/2020	unknown	unknown
9	County of Ventura	Social Worker IV	\$ 50,856	\$ 71,280	-0.7%	\$ 70,781	12/26/2020	12/27/2021	2.00%
10	County of Fresno	Social Worker III	\$ 50,570	\$ 64,714	4.7%	\$ 67,756	11/2/2020	unknown	unknown
12	County of Kern	Social Service Worker III	\$ 48,744	\$ 59,508	1.2%	\$ 60,222	4/21/2021	unknown	unknown
13	County of Orange	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 92,088	\$ 85,024
% County of San Diego Above/Below	-38.4%	-27.8%
Number of Matches	11	11

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

2 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Solid Waste Site Supervisor									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Orange	Landfill Operations Superintendent	\$ 77,958	\$ 104,749	-2.0%	\$ 102,654	7/2/2021	7/1/2022	3.50%
2	County of San Diego	Solid Waste Site Supervisor	\$ 66,165	\$ 81,266		\$ 81,266	6/18/2021	unknown	unknown
3	County of Riverside	Solid Waste Landfill Supervisor	\$ 48,439	\$ 71,710	1.9%	\$ 73,072	5/1/2021	5/1/2022	2.00%
4	County of Fresno	Disposal Site Lead Supervisor	\$ 48,204	\$ 61,724	4.7%	\$ 64,625	11/2/2020	unknown	unknown
5	City and County of San Francisco	N/C							
6	County of Alameda	N/C							
7	County of Contra Costa	N/C							
8	County of Kern	N/C							
9	County of Los Angeles	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 71,710	\$ 73,072
% County of San Diego Above/Below	11.8%	10.1%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Staff Accountant									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Sacramento	Accountant	\$ 65,960	\$ 80,179	0.1%	\$ 80,259	6/21/2020	unknown	unknown
2	County of Orange	Accountant/Auditor I	\$ 62,712	\$ 77,958	-2.0%	\$ 76,399	7/2/2021	7/1/2022	3.50%
3	City and County of San Francisco	Accountant I	\$ 75,084	\$ 91,260	-17.4%	\$ 75,381	7/1/2021	1/8/2022	.50%
4	County of Ventura	Accountant I	\$ 53,213	\$ 74,498	-0.7%	\$ 73,976	12/27/2020	12/26/2021	2.00%
5	County of Riverside	Accountant I	\$ 46,717	\$ 69,077	1.9%	\$ 70,390	5/1/2021	5/1/2022	2.00%
6	County of Alameda ¹	[Accounting Technician/ Accountant]	\$ 67,954	\$ 77,957	-11.4%	\$ 69,070	6/27/2021	6/26/2022	3.25%
7	County of San Diego	Staff Accountant	\$ 49,712	\$ 67,350		\$ 67,350	6/18/2021	unknown	unknown
8	County of Santa Clara	Accountant I	\$ 66,810	\$ 80,714	-16.8%	\$ 67,154	6/14/2021	6/13/2022	3.00%
9	County of San Mateo	Accountant I	\$ 64,936	\$ 81,181	-17.5%	\$ 66,974	10/4/2020	unknown	unknown
10	County of Contra Costa	Accountant I	\$ 60,799	\$ 73,901	-11.1%	\$ 65,698	7/1/2021	unknown	unknown
11	County of Los Angeles	Accountant I	\$ 56,289	\$ 64,468	-3.8%	\$ 62,019	1/1/2021	unknown	unknown
12	County of Fresno	Accountant I	\$ 46,462	\$ 56,472	4.7%	\$ 59,126	10/17/2019	unknown	unknown
13	County of San Bernardino	Accountant I	\$ 40,539	\$ 54,392	1.9%	\$ 55,425	7/31/2021	7/30/2022	3.00%
14	County of Kern	Accountant I	\$ 43,248	\$ 52,800	1.2%	\$ 53,434	4/21/2021	unknown	unknown

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 74,498	\$ 67,154
% County of San Diego Above/Below	-10.6%	0.3%
Number of Matches	13	13

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Staff Nurse									
1	City and County of San Francisco	Registered Nurse	\$ 141,518	\$ 185,848	-17.4%	\$ 153,510	7/1/2021	1/8/2022	.50%
2	County of Contra Costa	Registered Nurse	\$ 124,777	\$ 155,829	-11.1%	\$ 138,532	1/1/2021	unknown	unknown
3	County of Los Angeles	Public Health Nurse	\$ 90,609	\$ 135,631	-3.8%	\$ 130,477	1/1/2021	unknown	unknown
4	County of Santa Clara	Public Health Nurse II	\$ 128,509	\$ 155,780	-16.8%	\$ 129,609	6/14/2021	6/13/2022	3.00%
5	County of San Mateo ³	[Ambulatory Care Nurse/Community Mental Health Nurse]	\$ 133,679	\$ 149,445	-17.5%	\$ 123,292	2/7/2021	unknown	unknown
6	County of Alameda ¹	[Registered Nurse I/ Registered Nurse II]	\$ 104,655	\$ 118,966	-11.4%	\$ 105,404	6/27/2021	6/26/2022	3.25%
7	County of San Bernardino	Registered Nurse II-ARMC/Mental Health Nurse II	\$ 75,858	\$ 101,982	1.9%	\$ 103,920	8/15/2020	unknown	unknown
8	County of Ventura	Registered Nurse II	\$ 86,194	\$ 103,076	-0.7%	\$ 102,354	4/4/2021	4/17/2022	3.25%
9	County of Sacramento	Registered Nurse II	\$ 80,659	\$ 98,052	0.1%	\$ 98,150	8/2/2020	unknown	unknown
10	County of Fresno ²	[Staff Nurse II / Mental Health Nurse II]	\$ 76,414	\$ 92,872	4.7%	\$ 97,237	11/2/2020	unknown	unknown
11	County of Riverside	Registered Nurse II	\$ 76,023	\$ 93,416	1.9%	\$ 95,190	5/1/2021	5/1/2022	2.00%
13	County of Orange	Staff Nurse	\$ 62,712	\$ 84,469	-2.0%	\$ 82,779	7/2/2021	7/1/2022	3.50%
14	County of Kern	Staff Nurse	\$ 59,808	\$ 73,008	1.2%	\$ 73,884	4/21/2021	unknown	unknown

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 103,076	\$ 103,920
% County of San Diego Above/Below	-15.0%	-16.0%
Number of Matches	13	13

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

2 - County of Fresno: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

3 - County of San Mateo: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches. Bottom of range is step 3 for higher paid class.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Statistician									
1	County of Los Angeles	Data Scientist	\$ 100,478	\$ 135,409	-3.8%	\$ 130,264	1/1/2021	unknown	unknown
2	County of San Bernardino	Statistical Analyst	\$ 62,421	\$ 85,842	1.9%	\$ 87,473	7/31/2021	7/30/2022	3.00%
3	County of Orange	Research Analyst III	\$ 65,354	\$ 88,088	-2.0%	\$ 86,326	7/2/2021	7/1/2022	3.50%
4	City and County of San Francisco	Statistician	\$ 82,810	\$ 100,646	-17.4%	\$ 83,134	7/1/2021	1/8/2022	.50%
6	County of Alameda ¹	[Management Analyst Assistant/ Management Analyst]	\$ 68,734	\$ 88,494	-11.4%	\$ 78,405	12/27/2020	12/26/2021	3.00%
7	County of Riverside	Statistician	\$ 40,730	\$ 60,226	1.9%	\$ 61,370	5/1/2021	5/1/2022	2.00%
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of Sacramento	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 88,291	\$ 84,730
% County of San Diego Above/Below	-7.8%	-3.5%
Number of Matches	6	6

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Stock Clerk									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Assistant Storekeeper	\$ 55,354	\$ 67,288	-17.4%	\$ 55,580	7/1/2021	1/8/2022	.50%
2	County of Los Angeles	Warehouse Worker I	\$ 40,644	\$ 54,648	-3.8%	\$ 52,571	1/1/2021	unknown	unknown
3	County of Santa Clara	Warehouse Materials Handler	\$ 50,885	\$ 61,320	-16.8%	\$ 51,019	6/14/2021	6/13/2022	3.00%
4	County of Alameda	Supply Clerk I	\$ 46,254	\$ 55,049	-11.4%	\$ 48,773	6/27/2021	6/26/2022	3.25%
5	County of Orange	Store Clerk	\$ 37,606	\$ 49,650	-2.0%	\$ 48,657	7/2/2021	7/1/2022	3.50%
6	County of Riverside	Stock Clerk	\$ 30,138	\$ 47,007	1.9%	\$ 47,901	5/1/2021	5/1/2022	2.00%
7	County of Sacramento	Stock Clerk	\$ 38,252	\$ 46,500	0.1%	\$ 46,547	6/21/2020	unknown	unknown
8	County of Ventura	Inventory Management Assistant II	\$ 32,481	\$ 45,406	-0.7%	\$ 45,089	12/27/2020	12/26/2021	2.00%
9	County of San Mateo	Storekeeper I	\$ 43,284	\$ 54,079	-17.5%	\$ 44,615	10/4/2020	unknown	unknown
10	County of Contra Costa	Storeroom Clerk	\$ 40,272	\$ 48,952	-11.1%	\$ 43,518	7/1/2021	unknown	unknown
11	County of San Bernardino	Storekeeper	\$ 30,243	\$ 41,205	1.9%	\$ 41,988	7/31/2021	7/30/2022	3.00%
12	County of San Diego	Stock Clerk	\$ 31,554	\$ 38,834		\$ 38,834	6/18/2021	unknown	unknown
13	County of Kern	Stock Clerk	\$ 29,304	\$ 35,784	1.2%	\$ 36,213	4/21/2021	unknown	unknown
14	County of Fresno	Stock Clerk	\$ 30,264	\$ 33,358	4.7%	\$ 34,926	11/2/2020	unknown	unknown

Summary Results		Top Annual	Adjusted Top Annual
Median of Comparators		\$ 48,952	\$ 46,547
% County of San Diego Above/Below		-26.1%	-19.9%
Number of Matches		13	13

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Storekeeper									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Storekeeper	\$ 60,736	\$ 73,788	-17.4%	\$ 60,949	7/1/2021	1/8/2022	.50%
2	County of Santa Clara	Materials Supply Specialist	\$ 58,916	\$ 71,610	-16.8%	\$ 59,580	6/14/2021	6/13/2022	3.00%
3	County of Los Angeles	Warehouse Worker II	\$ 45,240	\$ 60,912	-3.8%	\$ 58,597	1/1/2021	unknown	unknown
4	County of Contra Costa	Storekeeper	\$ 51,942	\$ 63,136	-11.1%	\$ 56,128	7/1/2021	unknown	unknown
5	County of Orange	Storekeeper I	\$ 42,224	\$ 56,597	-2.0%	\$ 55,465	7/2/2021	7/1/2022	3.50%
6	County of Sacramento	Storekeeper I	\$ 44,725	\$ 54,351	0.1%	\$ 54,405	6/21/2020	unknown	unknown
7	County of San Mateo	Storekeeper II	\$ 52,727	\$ 65,914	-17.5%	\$ 54,379	10/4/2020	unknown	unknown
8	County of Riverside	Storekeeper	\$ 33,828	\$ 52,818	1.9%	\$ 53,822	5/1/2021	5/1/2022	2.00%
9	County of Alameda ¹	[Supply Clerk II/ Storekeeper I]	\$ 50,544	\$ 60,489	-11.4%	\$ 53,593	6/27/2021	6/26/2022	3.25%
10	County of San Bernardino	Stores Specialist	\$ 34,778	\$ 47,798	1.9%	\$ 48,707	7/31/2021	7/30/2022	3.00%
11	County of Ventura	Inventory Management Assistant III	\$ 34,900	\$ 48,805	-0.7%	\$ 48,463	12/27/2020	12/26/2021	2.00%
12	County of San Diego	Storekeeper	\$ 35,797	\$ 44,054		\$ 44,054	6/18/2021	unknown	unknown
13	County of Kern	Storekeeper I	\$ 29,460	\$ 35,964	1.2%	\$ 36,396	4/21/2021	unknown	unknown
14	County of Fresno	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 58,543	\$ 54,392
% County of San Diego Above/Below	-32.9%	-23.5%
Number of Matches	12	12

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Storekeeper II (T)									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Orange	Storekeeper II	\$ 47,154	\$ 62,899	-2.0%	\$ 61,641	7/2/2021	7/1/2022	3.50%
2	City and County of San Francisco	Storekeeper	\$ 60,736	\$ 73,788	-17.4%	\$ 60,949	7/1/2021	1/8/2022	.50%
3	County of Los Angeles	Warehouse Worker II	\$ 45,240	\$ 60,912	-3.8%	\$ 58,597	1/1/2021	unknown	unknown
4	County of Contra Costa	Storekeeper	\$ 51,942	\$ 63,136	-11.1%	\$ 56,128	7/1/2021	unknown	unknown
5	County of San Mateo	Storekeeper II	\$ 52,727	\$ 65,914	-17.5%	\$ 54,379	10/4/2020	unknown	unknown
6	County of Riverside	Storekeeper	\$ 33,828	\$ 52,818	1.9%	\$ 53,822	5/1/2021	5/1/2022	2.00%
7	County of Alameda ¹	[Supply Clerk II/ Storekeeper I]	\$ 50,544	\$ 60,489	-11.4%	\$ 53,593	6/27/2021	6/26/2022	3.25%
8	County of San Diego	Storekeeper II (T)	\$ 39,645	\$ 48,693		\$ 48,693	6/18/2021	unknown	unknown
9	County of Ventura	Inventory Management Assistant III	\$ 34,900	\$ 48,805	-0.7%	\$ 48,463	12/27/2020	12/26/2021	2.00%
10	County of Fresno	N/C							
11	County of Kern	N/C							
12	County of Sacramento	N/C							
13	County of San Bernardino	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 61,906	\$ 55,254
% County of San Diego Above/Below	-27.1%	-13.5%
Number of Matches	8	8

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Substance Abuse Assessor									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Contra Costa	Public Defender Client Services Specialist	\$ 73,327	\$ 89,130	-11.1%	\$ 79,237	7/1/2021	unknown	unknown
2	County of San Diego	Substance Abuse Assessor	\$ 62,130	\$ 76,378		\$ 76,378	6/18/2021	unknown	unknown
3	City and County of San Francisco	N/C							
4	County of Alameda	N/C							
5	County of Fresno	N/C							
6	County of Kern	N/C							
7	County of Los Angeles	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 89,130	\$ 79,237
% County of San Diego Above/Below	-16.7%	-3.7%
Number of Matches	1	1

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Agricultural/Standards Inspector									
1	County of San Mateo ²	[Biologist/Standards Specialist III/Deputy Director Of Agricultural Services]	\$ 98,424	\$ 123,040	-17.5%	\$ 101,508	12/13/2020	unknown	unknown
3	County of Contra Costa	Deputy Agriculture Commissioner	\$ 89,631	\$ 108,947	-11.1%	\$ 96,854	7/1/2021	unknown	unknown
4	County of Alameda ¹	[Agricultural and Standards Investigator III/ Deputy Agricultural Commissioner/ Sealer of Weights and Measures]	\$ 88,362	\$ 106,278	-11.4%	\$ 94,163	12/27/2020	unknown	unknown
5	County of Santa Clara	Supervising Agricultural Biologist	\$ 91,327	\$ 111,060	-16.8%	\$ 92,402	6/28/2021	6/27/2022	3.00%
6	County of Ventura	Supervising Agricultural Inspector/Biologist	\$ 62,884	\$ 88,038	-0.7%	\$ 87,422	12/26/2020	12/27/2021	2.00%
7	County of Riverside	Supervising Agricultural & Standards Investigator	\$ 57,392	\$ 84,970	1.9%	\$ 86,584	5/1/2021	5/1/2022	2.00%
8	County of San Bernardino	Supervising Agricultural/Standards Officer	\$ 59,883	\$ 82,326	1.9%	\$ 83,891	7/31/2021	7/30/2022	3.00%
9	County of Fresno	Supervising Agricultural/Standards Specialist	\$ 64,870	\$ 78,858	4.7%	\$ 82,564	4/19/2021	unknown	unknown
10	County of Kern	Supervising Agricultural Biologist/Weights and Measures Inspector	\$ 58,620	\$ 71,568	1.2%	\$ 72,427	4/21/2021	unknown	unknown
11	City and County of San Francisco	N/C							
12	County of Los Angeles	N/C							
13	County of Orange	N/C							
14	County of Sacramento	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 88,038	\$ 87,422
% County of San Diego Above/Below	9.2%	9.9%
Number of Matches	9	9

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

2 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Air Quality Inspector*									
1	Sacramento Metropolitan Air Quality Management District	Program Supervisor	\$ 101,971	\$ 136,655	0.1%	\$ 136,792	7/1/2021	unknown	unknown
2	Bay Area Air Quality Management District	Supervising Air Quality Inspector	\$ 103,939	\$ 126,339	-17.4%	\$ 104,356	11/8/2020	unknown	Unknown
4	South Coast Air Quality Management District	Supervising Air Quality Inspector	\$ 78,768	\$ 106,644	-2.8%	\$ 103,658	1/1/2020	unknown	unknown
5	County of Contra Costa	N/C							
6	County of Orange	N/C							
7	County of Ventura	N/C							
8	San Luis Obispo County Air Pollution Control District	N/C							
9	Imperial County Air Pollution Control District	N/C							
10	County of Sacramento	N/C							
11	City and County of San Francisco	N/C							
12	County of Santa Clara	N/C							
13	County of Los Angeles	N/C							
14	County of Fresno	N/C							
15	County of Kern	N/C							
16	County of Alameda	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 126,339	\$ 104,356
% County of San Diego Above/Below	-21.4%	-0.2%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Air Resources Specialist*									
1	Sacramento Metropolitan Air Quality Management District	Program Supervisor	\$ 101,971	\$ 136,655	0.1%	\$ 136,792	7/1/2021	unknown	unknown
2	South Coast Air Quality Management District	Supervising Air Quality Engineer	\$ 97,944	\$ 131,628	-2.8%	\$ 127,942	1/1/2020	unknown	unknown
3	Bay Area Air Quality Management District	Supervising Staff Specialist	\$ 120,322	\$ 146,253	-17.4%	\$ 120,805	11/8/2020	unknown	Unknown
						\$ 120,037	6/18/2021	unknown	unknown
5	County of Orange	N/C							
6	County of Ventura	N/C							
7	County of Contra Costa	N/C							
8	San Luis Obispo County Air Pollution Control District	N/C							
9	Imperial County Air Pollution Control District	N/C							
10	County of Sacramento	N/C							
11	City and County of San Francisco	N/C							
12	County of Santa Clara	N/C							
13	County of Los Angeles	N/C							
14	County of Fresno	N/C							
15	County of Kern	N/C							
16	County of Alameda	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 136,655	\$ 127,942
% County of San Diego Above/Below	-13.8%	-6.6%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Animal Care Attendant									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Contra Costa	Animal Center Operations Supervisor	\$ 68,615	\$ 83,402	-11.1%	\$ 74,144	7/1/2021	unknown	unknown
2	County of Riverside	Animal Services Supervisor	\$ 43,102	\$ 67,259	1.9%	\$ 68,537	5/1/2021	5/1/2022	2.00%
3	City and County of San Francisco	Animal Care Assistant Supervisor	\$ 63,752	\$ 77,506	-17.4%	\$ 64,020	7/1/2021	1/8/2022	.50%
4	County of Orange	Supervising Animal Care Attendant	\$ 48,090	\$ 64,813	-2.0%	\$ 63,517	7/2/2021	7/1/2022	3.50%
5	County of San Diego	Supervising Animal Care Attendant	\$ 49,317	\$ 60,653		\$ 60,653	6/18/2021	unknown	unknown
6	County of Kern	Senior Animal Care Worker	\$ 31,896	\$ 38,940	1.2%	\$ 39,407	4/21/2021	unknown	unknown
7	County of Alameda	N/C							
8	County of Fresno	N/C							
9	County of Los Angeles	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 67,259	\$ 64,020
% County of San Diego Above/Below	-10.9%	-5.6%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Animal Control Officer									
1	County of Santa Clara	Animal Services Field Manager	\$ 105,756	\$ 128,602	-16.8%	\$ 106,997	6/28/2021	6/27/2022	3.00%
2	County of Orange	Supervising Animal Control Officer	\$ 68,432	\$ 92,248	-2.0%	\$ 90,403	7/2/2021	7/1/2022	3.50%
3	County of Sacramento	Supervising Animal Control Officer	\$ 69,050	\$ 83,917	0.1%	\$ 84,001	6/22/2020	unknown	unknown
4	City and County of San Francisco	Animal Control Supervisor	\$ 80,210	\$ 97,500	-17.4%	\$ 80,535	7/1/2021	1/8/2022	.50%
5	County of Los Angeles	Animal Control Officer IV	\$ 60,319	\$ 81,282	-3.8%	\$ 78,193	1/1/2021	unknown	unknown
7	County of Ventura	Supervising Animal Control Officer	\$ 47,267	\$ 66,113	-0.7%	\$ 65,650	12/26/2020	12/27/2021	2.00%
8	County of San Bernardino	Supervising Animal Control Officer I	\$ 42,037	\$ 57,762	1.9%	\$ 58,859	7/31/2021	7/30/2022	3.00%
9	County of Kern	Senior Animal Control Officer	\$ 38,364	\$ 46,836	1.2%	\$ 47,398	4/21/2021	unknown	unknown
10	County of Alameda	N/C							
11	County of Contra Costa	N/C							
12	County of Fresno	N/C							
13	County of Riverside	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 82,599	\$ 79,364
% County of San Diego Above/Below	-16.3%	-11.7%
Number of Matches	8	8

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Appraiser I									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Los Angeles	Supervising Appraiser	\$ 87,086	\$ 117,357	-3.8%	\$ 112,897	1/1/2021	unknown	unknown
2	County of San Diego	Supervising Appraiser I	\$ 89,398	\$ 109,907		\$ 109,907	6/18/2021	unknown	unknown
3	County of Orange	Senior Appraiser	\$ 83,408	\$ 112,091	-2.0%	\$ 109,849	7/2/2021	7/1/2022	3.50%
4	County of Contra Costa	Supervising Appraiser	\$ 96,099	\$ 123,015	-11.1%	\$ 109,360	7/1/2021	unknown	unknown
5	County of Sacramento	Supervising Real Property Appraiser	\$ 89,471	\$ 108,743	0.1%	\$ 108,852	6/21/2020	unknown	unknown
6	County of San Mateo ²	[Senior Appraiser/Principal Appraiser]	\$ 97,737	\$ 122,218	-17.5%	\$ 100,830	10/4/2020	unknown	unknown
7	County of Fresno	Senior Appraiser	\$ 72,072	\$ 92,170	4.7%	\$ 96,502	11/2/2020	unknown	unknown
8	County of Alameda ¹	[Appraiser III/ Supervising Appraiser I]	\$ 87,604	\$ 105,929	-11.4%	\$ 93,853	12/27/2020	6/27/2021	3.00%
9	County of Kern	Senior Appraiser	\$ 62,244	\$ 75,984	1.2%	\$ 76,896	4/21/2021	unknown	unknown
10	City and County of San Francisco	N/C							
11	County of Riverside	N/C							
12	County of San Bernardino	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 110,417	\$ 104,841
% County of San Diego Above/Below	-0.5%	4.6%
Number of Matches	8	8

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

2 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Appraiser II									
1	City and County of San Francisco	Principal Real Property Appraiser	\$ 119,288	\$ 156,078	-17.4%	\$ 128,920	7/1/2021	1/8/2022	.50%
2	County of Orange	Managing Appraiser	\$ 92,893	\$ 125,070	-2.0%	\$ 122,569	7/2/2021	7/1/2022	3.50%
3	County of Santa Clara	Supervising Appraiser	\$ 120,709	\$ 146,723	-16.8%	\$ 122,074	6/28/2021	6/27/2022	3.00%
4	County of Contra Costa ¹	[Supervising Appraiser/Principal Appraiser]	\$ 107,263	\$ 137,312	-11.1%	\$ 122,071	7/1/2021	unknown	unknown
6	County of Ventura	Supervising Appraiser	\$ 80,443	\$ 118,263	-0.7%	\$ 117,435	12/26/2020	12/27/2021	2.00%
7	County of Riverside	Supervising Appraiser	\$ 65,675	\$ 97,250	1.9%	\$ 99,098	5/1/2021	5/1/2022	2.00%
8	County of San Bernardino	Supervising District Appraiser	\$ 70,512	\$ 96,990	1.9%	\$ 98,833	7/31/2021	7/30/2022	3.00%
9	County of Fresno	Senior Appraiser	\$ 72,072	\$ 92,170	4.7%	\$ 96,502	11/2/2020	unknown	unknown
10	County of Alameda	Supervising Appraiser I	\$ 83,117	\$ 100,963	-11.4%	\$ 89,453	12/27/2020	12/26/2021	3.00%
11	County of Kern	Supervising Appraiser	\$ 67,752	\$ 82,704	1.2%	\$ 83,696	4/21/2021	unknown	unknown
12	County of Los Angeles	N/C							
13	County of Sacramento	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 109,613	\$ 108,266
% County of San Diego Above/Below	9.4%	10.5%
Number of Matches	10	10

N/C - Non Comparator

1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Assessment Clerk									
1	County of Santa Clara	Supervising Assessment Clerk	\$ 78,919	\$ 95,901	-16.8%	\$ 79,789	6/28/2021	6/27/2022	3.00%
2	City and County of San Francisco	Principal Clerk	\$ 75,946	\$ 92,352	-17.4%	\$ 76,283	7/1/2021	1/8/2022	.50%
3	County of Fresno	Supervising Assessment Technician	\$ 59,800	\$ 72,696	4.7%	\$ 76,113	4/19/2021	unknown	unknown
4	County of Orange	Principal Assessment Technician	\$ 54,974	\$ 73,528	-2.0%	\$ 72,057	7/2/2021	7/1/2022	3.50%
5	County of San Bernardino	Records Technician Supervisor II	\$ 49,317	\$ 67,662	1.9%	\$ 68,948	7/31/2021	7/30/2022	3.00%
6	County of Contra Costa ¹	[Supervising Assessment Clerk/Clerk-Recorder Services Supervisor]	\$ 61,566	\$ 76,610	-11.1%	\$ 68,106	7/1/2021	unknown	unknown
8	County of Alameda	N/C							
9	County of Kern	N/C							
10	County of Los Angeles	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 75,069	\$ 74,085
% County of San Diego Above/Below	-28.3%	-26.7%
Number of Matches	6	6

N/C - Non Comparator

1 - County of Contra Costa: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Audit-Appraiser									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Diego	Supervising Audit Appraiser	\$ 98,384	\$ 120,952		\$ 120,952	6/18/2021	unknown	unknown
2	City and County of San Francisco	Principal Tax Auditor-Appraiser	\$ 119,292	\$ 144,972	-17.4%	\$ 119,747	7/1/2021	1/8/2022	.50%
3	County of Santa Clara	Supervising Auditor-Appraiser	\$ 117,193	\$ 142,451	-16.8%	\$ 118,519	6/28/2021	6/27/2022	3.00%
4	County of Ventura	Supervising Auditor-Appraiser	\$ 70,443	\$ 118,263	-0.7%	\$ 117,435	12/26/2020	12/27/2021	2.00%
5	County of Orange	Senior Auditor-Appraiser	\$ 83,408	\$ 112,091	-2.0%	\$ 109,849	7/2/2021	7/1/2022	3.50%
6	County of Contra Costa	Supervising Auditor-Appraiser	\$ 96,099	\$ 123,015	-11.1%	\$ 109,360	7/1/2021	unknown	unknown
7	County of San Mateo	Principal Auditor-Appraiser	\$ 105,932	\$ 132,493	-17.5%	\$ 109,307	10/4/2020	unknown	unknown
8	County of Sacramento	Supervising Auditor Appraiser	\$ 89,471	\$ 108,743	0.1%	\$ 108,852	6/21/2020	unknown	unknown
9	County of Alameda	Supervising Auditor-Appraiser II	\$ 95,680	\$ 116,230	-11.4%	\$ 102,980	12/27/2020	12/26/2021	3.00%
10	County of Riverside	Supervising Auditor/Appraiser	\$ 66,319	\$ 98,203	1.9%	\$ 100,069	5/1/2021	5/1/2022	2.00%
11	County of San Bernardino	Supervising Auditor Appraiser	\$ 70,512	\$ 96,990	1.9%	\$ 98,833	7/31/2021	7/30/2022	3.00%
12	County of Fresno	Senior Audit-Appraiser	\$ 72,072	\$ 92,170	4.7%	\$ 96,502	11/2/2020	unknown	unknown
13	County of Kern	Supervising Auditor-Appraiser	\$ 67,752	\$ 82,704	1.2%	\$ 83,696	4/21/2021	unknown	unknown
14	County of Los Angeles	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 114,161	\$ 109,079
% County of San Diego Above/Below	5.6%	9.8%
Number of Matches	12	12

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Child Support Officer									
1	County of Santa Clara	Supervising Child Support Officer	\$ 95,909	\$ 116,624	-16.8%	\$ 97,031	6/28/2021	6/27/2022	3.00%
2	City and County of San Francisco	Child Support Officer III	\$ 95,676	\$ 116,244	-17.4%	\$ 96,018	7/1/2021	1/8/2022	.50%
3	County of San Mateo	Child Support Supervisor	\$ 85,798	\$ 107,201	-17.5%	\$ 88,441	10/4/2020	unknown	unknown
4	County of Los Angeles	Supervising Child Support Specialist	\$ 67,060	\$ 90,375	-3.8%	\$ 86,941	1/1/2021	unknown	unknown
5	County of Riverside	Child Support Services Supervisor	\$ 56,466	\$ 83,606	1.9%	\$ 85,195	5/1/2021	5/1/2022	2.00%
6	County of Alameda	Child Support Supervisor I	\$ 76,918	\$ 93,475	-11.4%	\$ 82,819	12/27/2020	12/26/2021	3.00%
7	County of Ventura	Supervising Child Support Services Specialist	\$ 57,584	\$ 82,524	-0.7%	\$ 81,947	12/26/2020	12/27/2021	2.00%
8	County of Sacramento	Supervising Child Support Officer	\$ 66,962	\$ 81,390	0.1%	\$ 81,471	6/21/2021	unknown	unknown
9	County of Contra Costa	Child Support Supervisor	\$ 75,148	\$ 91,343	-11.1%	\$ 81,204	7/1/2021	unknown	unknown
10	County of Orange	Supervising Child Support Specialist	\$ 59,738	\$ 80,538	-2.0%	\$ 78,927	7/2/2021	7/1/2022	3.50%
11	County of Fresno	Supervising Child Support Specialist	\$ 57,902	\$ 74,074	4.7%	\$ 77,555	11/2/2020	unknown	unknown
13	County of San Bernardino	Supervising Child Support Officer	\$ 51,334	\$ 70,658	1.9%	\$ 72,000	7/31/2021	7/30/2022	3.00%
14	County of Kern	Supervising Child Support Specialist	\$ 51,492	\$ 62,868	1.2%	\$ 63,622	4/21/2021	unknown	unknown

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 83,606	\$ 81,947
% County of San Diego Above/Below	-7.8%	-5.7%
Number of Matches	13	13

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Communicable Disease Investigator									
1	County of Los Angeles	Supervising Public Health Investigator	\$ 69,586	\$ 93,779	-3.8%	\$ 90,215	1/1/2021	unknown	unknown
3	City and County of San Francisco	Senior Disease Control Investigator	\$ 80,990	\$ 98,436	-17.4%	\$ 81,308	7/1/2021	1/8/2022	.50%
4	County of San Bernardino	Supervising Communicable Disease Investigator	\$ 52,666	\$ 72,301	1.9%	\$ 73,675	7/31/2021	7/30/2022	3.00%
5	County of Alameda	Senior Public Health Investigator	\$ 68,141	\$ 82,805	-11.4%	\$ 73,365	12/27/2020	unknown	unknown
6	County of Fresno	Supervising Communicable Disease Specialist	\$ 48,542	\$ 62,062	4.7%	\$ 64,979	11/2/2020	unknown	unknown
7	County of Contra Costa	N/C							
8	County of Kern	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 82,805	\$ 73,675
% County of San Diego Above/Below	1.5%	12.3%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Community Health Promotion Specialist									
1	County of Alameda	Supervising Program Specialist	\$ 88,733	\$ 118,810	-11.4%	\$ 105,265	12/27/2020	12/26/2021	3.00%
2	City and County of San Francisco	Senior Health Educator	\$ 103,636	\$ 125,970	-17.4%	\$ 104,051	7/1/2021	1/8/2022	.50%
3	County of San Mateo	Chief Public Health Education	\$ 91,165	\$ 114,003	-17.5%	\$ 94,052	10/4/2020	unknown	unknown
5	County of San Bernardino	Supervising Health Education Specialist	\$ 57,096	\$ 78,416	1.9%	\$ 79,906	7/31/2021	7/30/2022	3.00%
6	County of Fresno	Health Educator	\$ 52,234	\$ 66,846	4.7%	\$ 69,988	11/2/2020	unknown	unknown
7	County of Kern	Senior Health Educator	\$ 50,724	\$ 61,932	1.2%	\$ 62,675	4/21/2021	unknown	unknown
8	County of Contra Costa	N/C							
9	County of Los Angeles	N/C							
10	County of Orange	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 96,209	\$ 86,979
% County of San Diego Above/Below	-14.2%	-3.3%
Number of Matches	6	6

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Correctional Counselor									
1	County of Santa Clara	Supervising Probation Counselor	\$ 123,727	\$ 150,401	-16.8%	\$ 125,133	6/28/2021	6/27/2022	3.00%
2	County of Riverside	Supervising Correctional Counselor	\$ 72,182	\$ 95,848	1.9%	\$ 97,669	7/1/2021	7/1/2022	3-4%
4	City and County of San Francisco	N/C							
5	County of Alameda	N/C							
6	County of Contra Costa	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Los Angeles	N/C							
10	County of Orange	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 123,124	\$ 111,401
% County of San Diego Above/Below	-33.9%	-21.1%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Criminalist									
1	City and County of San Francisco	Criminalist III	\$ 148,668	\$ 180,696	-17.4%	\$ 149,255	7/1/2021	1/8/2022	.50%
2	County of Contra Costa	Forensic Supervisor	\$ 131,158	\$ 163,409	-11.1%	\$ 145,270	7/1/2021	7/1/2022	5.00%
4	County of Sacramento	Supervising Criminalist	\$ 114,569	\$ 139,249	0.1%	\$ 139,388	6/21/2021	unknown	unknown
5	County of Santa Clara	Supervising Criminalist	\$ 134,418	\$ 163,394	-16.8%	\$ 135,944	6/28/2021	6/27/2022	3.00%
6	County of Alameda	Supervising Criminalist	\$ 123,635	\$ 150,342	-11.4%	\$ 133,203	11/1/2020	10/31/2021	2.00%
7	County of San Bernardino	Supervising Criminalist	\$ 94,598	\$ 130,374	1.9%	\$ 132,851	7/31/2021	7/30/2022	3.00%
8	County of Ventura	Supervising Forensic Scientist	\$ 90,088	\$ 132,730	-0.7%	\$ 131,801	12/26/2020	12/27/2021	2.00%
9	County of Los Angeles	Supervising Criminalist I	\$ 106,605	\$ 136,077	-3.8%	\$ 130,906	1/1/2021	unknown	unknown
10	County of San Mateo	Supervising Criminalist	\$ 120,076	\$ 150,069	-17.5%	\$ 123,807	12/13/2020	12/12/2021	2-4%
11	County of Kern	Supervising Criminalist	\$ 90,924	\$ 111,000	1.2%	\$ 112,332	4/21/2021	unknown	unknown
12	County of Orange	Supervising Forensic Specialist	\$ 85,030	\$ 114,587	-2.0%	\$ 112,295	7/2/2021	7/1/2022	3.50%
13	County of Fresno	N/C							
14	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 139,249	\$ 132,851
% County of San Diego Above/Below	1.4%	5.9%
Number of Matches	11	11

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Deputy Public Administrator-Guardian									
1	County of Santa Clara	Supervising Deputy Public Guardian	\$ 108,948	\$ 132,434	-16.8%	\$ 110,185	6/28/2021	6/27/2022	3.00%
2	County of Contra Costa	Conservatorship and Guardianship Program Supervisor	\$ 93,622	\$ 113,798	-11.1%	\$ 101,167	7/1/2021	unknown	unknown
3	County of Los Angeles	Supervising Deputy Public Guardian/Sup Deputy Public Conservator-Administrator I	\$ 75,119	\$ 101,221	-3.8%	\$ 97,375	1/1/2021	unknown	unknown
4	County of Alameda	Supervising Assistant Public Guardian-Conservator	\$ 89,274	\$ 108,451	-11.4%	\$ 96,088	12/27/2020	12/26/2021	3.00%
5	County of Orange ¹	[Sup Deputy PA/Sup PG]	\$ 69,597	\$ 93,766	-2.0%	\$ 91,891	7/2/2021	7/1/2022	3.50%
6	County of Riverside ²	[Supervising Deputy Public Administrator/ Supervising Deputy Public Guardian]	\$ 54,452	\$ 80,559	1.9%	\$ 82,090	5/1/2021	5/1/2022	2.00%
7	County of San Bernardino	Supervising Deputy Public Guardian	\$ 57,096	\$ 78,416	1.9%	\$ 79,906	7/31/2021	7/30/2022	3.00%
9	County of Sacramento	Supervising Deputy Public Guardian/Conservator	\$ 62,243	\$ 75,627	0.1%	\$ 75,703	6/21/2020	unknown	unknown
10	County of Kern	Supervising Deputy Public Administrator	\$ 58,620	\$ 71,568	1.2%	\$ 72,427	4/21/2021	unknown	unknown
11	County of Ventura	Senior Deputy Public Administrator-Guardian-Conservator	\$ 52,004	\$ 72,758	-0.7%	\$ 72,248	12/26/2020	12/27/2021	2.00%
12	City and County of San Francisco	N/C							
13	County of Fresno	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 87,163	\$ 86,990
% County of San Diego Above/Below	-9.2%	-9.0%
Number of Matches	10	10

N/C - Non Comparator

1 - County of Orange: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the higher of the matches.

2 - County of Riverside: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the same for both matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Electronic Instrument Technician									
1	Sacramento Metropolitan Air Quality Management District	Program Supervisor	\$ 101,971	\$ 136,655	0.1%	\$ 136,792	7/1/2021	unknown	unknown
2	Bay Area Air Quality Management District	Supervising Air Quality Instrument Specialist	\$ 103,939	\$ 126,339	-17.4%	\$ 104,356	11/8/2020	unknown	Unknown
3	South Coast Air Quality Management District	Principal Air Quality Instrument Specialist	\$ 78,768	\$ 106,644	-2.8%	\$ 103,658	1/1/2020	unknown	unknown
4	County of Los Angeles	Head Instrument Technician	\$ 77,748	\$ 104,772	-3.8%	\$ 100,791	1/1/2021	unknown	unknown
6	County of Orange	N/C							
7	County of Ventura	N/C							
8	County of Contra Costa	N/C							
9	San Luis Obispo County Air Pollution Control District	N/C							
10	Imperial County Air Pollution Control District	N/C							
11	County of Alameda	N/C							
12	City and County of San Francisco	N/C							
13	County of Santa Clara	N/C							
14	County of Fresno	N/C							
15	County of Kern	N/C							
16	County of Sacramento	N/C							
17	County of San Mateo	N/C							
18	County of San Bernardino	N/C							
19	County of Riverside	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 116,491	\$ 104,007
% County of San Diego Above/Below	-33.1%	-18.9%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Environmental Health Specialist									
1	City and County of San Francisco	Principal Environmental Health Inspector	\$ 127,426	\$ 154,856	-17.4%	\$ 127,911	7/1/2021	1/8/2022	.50%
2	County of Santa Clara	Supervising Environmental Health Specialist	\$ 126,152	\$ 153,348	-16.8%	\$ 127,586	6/28/2021	6/27/2022	3.00%
3	County of San Mateo	Environmental Health Program Supervisor	\$ 118,266	\$ 147,802	-17.5%	\$ 121,937	10/4/2020	unknown	unknown
4	County of Alameda	Supervising Environmental Health Specialist	\$ 113,776	\$ 136,136	-11.4%	\$ 120,617	12/27/2020	12/26/2021	3.00%
5	County of Sacramento	Environmental Specialist IV	\$ 107,574	\$ 117,998	0.1%	\$ 118,116	6/30/2021	unknown	unknown
6	County of Contra Costa	Supervising Environmental Health Specialist	\$ 99,648	\$ 121,124	-11.1%	\$ 107,679	7/1/2021	unknown	unknown
7	County of Los Angeles	Chief Environmental Health Specialist	\$ 82,285	\$ 110,892	-3.8%	\$ 106,678	1/1/2021	unknown	unknown
8	County of Riverside	Supervising Environmental Health Specialist	\$ 69,534	\$ 102,933	1.9%	\$ 104,888	5/1/2021	5/1/2022	2.00%
9	County of Ventura	Supervising Environmental Health Specialist	\$ 75,082	\$ 105,378	-0.7%	\$ 104,640	12/26/2020	12/27/2021	2.00%
10	County of Orange	Supervising Environmental Health Specialist	\$ 78,374	\$ 105,622	-2.0%	\$ 103,510	7/2/2021	7/1/2022	3.50%
12	County of San Bernardino	Supervising Environmental Health Specialist	\$ 70,990	\$ 97,781	1.9%	\$ 99,639	7/31/2021	7/30/2022	3.00%
13	County of Fresno	Supervising Environmental Health Specialist	\$ 71,760	\$ 91,832	4.7%	\$ 96,148	11/2/2020	unknown	unknown
14	County of Kern	Environmental Health Specialist IV	\$ 69,456	\$ 84,792	1.2%	\$ 85,810	4/21/2021	unknown	unknown

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 110,892	\$ 106,678
% County of San Diego Above/Below	-9.9%	-5.8%
Number of Matches	13	13

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Health Information Specialist									
1	County of San Mateo	Senior Community Health Planner	\$ 94,430	\$ 117,996	-17.5%	\$ 97,347	10/4/2020	unknown	unknown
3	County of Riverside	Senior Health Educator	\$ 55,591	\$ 82,276	1.9%	\$ 83,840	5/1/2021	5/1/2022	2.00%
4	County of San Bernardino	Supervising Health Education Specialist	\$ 57,096	\$ 78,416	1.9%	\$ 79,906	7/31/2021	7/30/2022	3.00%
5	County of Orange	Health Educator	\$ 57,762	\$ 77,605	-2.0%	\$ 76,053	7/2/2021	7/1/2022	3.50%
6	City and County of San Francisco	N/C							
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of Los Angeles	N/C							
12	County of Sacramento	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 80,346	\$ 81,873
% County of San Diego Above/Below	4.6%	2.8%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Human Services Control Specialist									
1	City and County of San Francisco	Program Specialist Supervisor	\$ 101,322	\$ 123,214	-17.4%	\$ 101,775	7/1/2021	1/8/2022	.50%
2	County of Santa Clara	Eligibility Work Supervisor	\$ 91,780	\$ 111,076	-16.8%	\$ 92,415	6/14/2021	6/13/2022	3.00%
3	County of Alameda	Supervising Eligibility Technician	\$ 80,205	\$ 97,219	-11.4%	\$ 86,136	9/6/2020	unknown	unknown
5	County of San Bernardino	Human Services System Quality Review Supervisor I	\$ 46,592	\$ 63,960	1.9%	\$ 65,175	7/31/2021	7/30/2022	3.00%
6	County of Contra Costa	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Los Angeles	N/C							
10	County of Orange	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 104,148	\$ 89,276
% County of San Diego Above/Below	-46.7%	-25.8%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Human Services Specialist									
1	City and County of San Francisco	Program Specialist Supervisor	\$ 101,322	\$ 123,214	-17.4%	\$ 101,775	7/1/2021	1/8/2022	.50%
2	County of Orange	Social Services Supervisor II	\$ 70,658	\$ 95,139	-2.0%	\$ 93,236	7/2/2021	7/1/2022	3.50%
3	County of San Mateo	Human Services Supervisor	\$ 88,585	\$ 110,758	-17.5%	\$ 91,375	10/4/2020	unknown	unknown
4	County of Alameda	Supervising Eligibility Technician	\$ 80,205	\$ 97,219	-11.4%	\$ 86,136	9/6/2020	unknown	unknown
5	County of Sacramento	Human Services Supervisor	\$ 69,468	\$ 84,439	0.1%	\$ 84,523	6/21/2020	unknown	unknown
6	County of Contra Costa	Eligibility Work Supervisor	\$ 72,043	\$ 92,002	-11.1%	\$ 81,789	7/1/2021	unknown	unknown
7	County of Ventura	HS Client Benefit Supervisor	\$ 65,020	\$ 73,629	-0.7%	\$ 73,113	12/26/2020	12/27/2021	2.00%
8	County of Riverside	Eligibility Supervisor	\$ 42,902	\$ 66,982	1.9%	\$ 68,254	5/1/2021	5/1/2022	2.00%
10	County of San Bernardino	Eligibility Worker Supervisor I	\$ 44,658	\$ 61,464	1.9%	\$ 62,632	7/31/2021	7/30/2022	3.00%
11	County of Kern	Human Services Supervisor	\$ 47,304	\$ 57,756	1.2%	\$ 58,449	4/21/2021	unknown	unknown
12	County of Fresno	N/C							
13	County of Los Angeles	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 88,220	\$ 83,156
% County of San Diego Above/Below	-30.4%	-22.9%
Number of Matches	10	10

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Industrial Hygienist									
1	City and County of San Francisco	Senior Industrial Hygienist	\$ 134,186	\$ 175,396	-17.4%	\$ 144,877	7/1/2021	1/8/2022	.50%
2	County of Los Angeles	Head, Industrial Hygienist	\$ 99,488	\$ 134,074	-3.8%	\$ 128,979	1/1/2021	unknown	unknown
3	County of Alameda	Supervising Industrial Hygiene Engineer	\$ 109,346	\$ 130,853	-11.4%	\$ 115,936	12/27/2020	unknown	unknown
5	County of Fresno	Supervising Environmental Health Specialist	\$ 71,760	\$ 91,832	4.7%	\$ 96,148	11/2/2020	unknown	unknown
6	County of Kern	Hazardous Materials Specialist IV	\$ 59,808	\$ 73,008	1.2%	\$ 73,884	4/21/2021	unknown	unknown
7	County of Contra Costa	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 130,853	\$ 115,936
% County of San Diego Above/Below	-23.3%	-9.2%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Nurse									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Assistant Nurse Manager	\$ 164,299	\$ 220,401	-16.8%	\$ 183,374	10/19/2020	11/1/2021	3.00%
2	County of San Mateo	Clinical Services Manager II - Nursing	\$ 154,707	\$ 193,395	-17.5%	\$ 159,551	12/13/2020	unknown	unknown
3	County of Los Angeles	Supervising Clinic Nurse I	\$ 96,127	\$ 143,891	-3.8%	\$ 138,423	1/1/2021	unknown	unknown
4	County of Fresno	Head Nurse	\$ 94,822	\$ 121,290	4.7%	\$ 126,991	11/2/2020	unknown	unknown
5	County of San Bernardino	Assistant Unit Manager II	\$ 85,384	\$ 117,458	1.9%	\$ 119,689	7/31/2021	7/30/2022	3.00%
6	County of Orange	Supervising Public Health Nurse I	\$ 86,840	\$ 116,584	-2.0%	\$ 114,252	7/2/2021	7/1/2022	3.50%
7	County of Sacramento	Supervising Registered Nurse	\$ 90,348	\$ 109,787	0.1%	\$ 109,897	6/21/2020	unknown	unknown
8	County of San Diego	Supervising Nurse	\$ 87,755	\$ 107,806		\$ 107,806	6/18/2021	unknown	unknown
9	County of Kern	Supervising Nurse	\$ 78,684	\$ 96,060	1.2%	\$ 97,213	4/21/2021	unknown	unknown
10	City and County of San Francisco	N/C							
11	County of Alameda	N/C							
12	County of Contra Costa	N/C							
13	County of Riverside	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 119,374	\$ 123,340
% County of San Diego Above/Below	-10.7%	-14.4%
Number of Matches	8	8

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Occupational/Physical Therapist									
1	County of Santa Clara	Occupational Therapist III/Physical Therapist III	\$ 128,856	\$ 155,961	-16.8%	\$ 129,759	6/14/2021	6/13/2022	3.00%
2	County of Los Angeles	Occupational Therapist Supervisor I/Physical Therapist Supervisor I	\$ 96,354	\$ 129,848	-3.8%	\$ 124,913	1/1/2021	unknown	unknown
3	County of Ventura	Supervising Therapist I	\$ 82,927	\$ 122,039	-0.7%	\$ 121,184	12/26/2020	12/27/2021	2.00%
4	County of Riverside ¹	[Supervising Occupational Therapist/ Supervising Physical Therapist]	\$ 72,837	\$ 116,851	1.9%	\$ 119,071	5/1/2021	5/1/2022	2.00%
5	County of Sacramento	Supervising Therapist	\$ 97,698	\$ 118,765	0.1%	\$ 118,884	6/21/2020	unknown	unknown
6	County of San Bernardino	Supervising Rehabilitation Therapist	\$ 83,720	\$ 115,232	1.9%	\$ 117,421	7/31/2021	7/30/2022	3.00%
7	County of Kern	Supervising Therapist	\$ 94,632	\$ 115,572	1.2%	\$ 116,959	4/21/2021	unknown	unknown
8	County of Alameda	Supervising Therapist	\$ 103,771	\$ 125,819	-11.4%	\$ 111,476	12/27/2020	12/26/2021	3.00%
10	County of San Mateo	Supervising Therapist	\$ 104,518	\$ 130,663	-17.5%	\$ 107,797	10/4/2020	unknown	unknown
11	County of Contra Costa	Supervising Pediatric Therapist	\$ 95,589	\$ 116,189	-11.1%	\$ 103,292	7/1/2021	unknown	unknown
12	City and County of San Francisco	N/C							
13	County of Fresno	N/C							
14	County of Orange	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 120,402	\$ 118,153
% County of San Diego Above/Below	-10.7%	-8.6%
Number of Matches	10	10

N/C - Non Comparator

1 - County of Riverside: Functional Match: This hybrid match represents that the duties of the class are performed by more than one class at the comparator agency. The salary displayed is the same for both matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Office Assistant									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Alameda	Supervising Clerk III	\$ 77,189	\$ 93,517	-11.4%	\$ 82,856	12/27/2020	12/26/2021	3.00%
2	City and County of San Francisco	Principal Clerk	\$ 75,946	\$ 92,352	-17.4%	\$ 76,283	7/1/2021	1/8/2022	.50%
3	County of Ventura	Clerical Supervisor III	\$ 50,221	\$ 70,345	-0.7%	\$ 69,853	12/26/2020	12/27/2021	2.00%
4	County of Contra Costa ¹	[Clerical Supervisor/Office Manager]	\$ 60,538	\$ 77,309	-11.1%	\$ 68,728	7/1/2021	unknown	unknown
5	County of Orange	Senior Office Supervisor A/B	\$ 50,918	\$ 68,162	-2.0%	\$ 66,798	7/2/2021	7/1/2022	3.50%
6	County of Riverside	Supervising Office Assistant II	\$ 36,711	\$ 57,244	1.9%	\$ 58,331	5/1/2021	5/1/2022	2.00%
7	County of San Diego	Supervising Office Assistant	\$ 45,198	\$ 55,515		\$ 55,515	6/18/2021	unknown	unknown
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Los Angeles	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 73,827	\$ 69,290
% County of San Diego Above/Below	-33.0%	-24.8%
Number of Matches	6	6

N/C - Non Comparator

1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Park Ranger									
1	County of Santa Clara	Park Ranger Supervisor	\$ 109,458	\$ 133,078	-16.8%	\$ 110,721	6/28/2021	6/27/2022	3.00%
2	County of San Mateo	Park Ranger IV	\$ 91,789	\$ 114,751	-17.5%	\$ 94,670	10/4/2020	unknown	unknown
3	City and County of San Francisco	Head Park Ranger	\$ 84,214	\$ 102,388	-17.4%	\$ 84,572	7/1/2021	1/8/2022	.50%
4	County of Orange	Supervising Park Ranger II	\$ 62,442	\$ 84,074	-2.0%	\$ 82,392	7/2/2021	7/1/2022	3.50%
5	County of Kern	Supervising Park Ranger	\$ 61,320	\$ 74,856	1.2%	\$ 75,754	4/21/2021	unknown	unknown
6	County of San Bernardino	Assistant Park Superintendent	\$ 51,771	\$ 71,032	1.9%	\$ 72,382	7/31/2021	7/30/2022	3.00%
7	County of Riverside	Park Ranger Supervisor - Parks	\$ 46,743	\$ 68,982	1.9%	\$ 70,292	5/1/2021	5/1/2022	2.00%
9	County of Ventura	Supervising Park Ranger	\$ 44,408	\$ 62,199	-0.7%	\$ 61,763	12/26/2020	12/27/2021	2.00%
10	County of Alameda	N/C							
11	County of Contra Costa	N/C							
12	County of Fresno	N/C							
13	County of Los Angeles	N/C							
14	County of Sacramento	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 79,465	\$ 79,073
% County of San Diego Above/Below	-16.2%	-15.6%
Number of Matches	8	8

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Pest Management Technician									
1	City and County of San Francisco	Senior Integrated Pest Management Specialist	\$ 88,140	\$ 107,146	-17.4%	\$ 88,503	7/1/2021	1/8/2022	.50%
2	County of Alameda ¹	[Vegetation Technician/ Weed and Pest Control Supervisor]	\$ 96,013	\$ 97,760	-11.4%	\$ 86,615	12/27/2020	12/26/2021	3.00%
4	County of Los Angeles	Pest Exterminator Working Supervisor	\$ 50,878	\$ 68,565	-3.8%	\$ 65,959	1/1/2021	unknown	unknown
5	County of Kern	Pest Control Advisor/Applicator	\$ 37,236	\$ 45,456	1.2%	\$ 46,001	4/21/2021	unknown	unknown
6	County of Contra Costa	N/C							
7	County of Fresno	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 83,162	\$ 76,287
% County of San Diego Above/Below	-11.0%	-1.9%
Number of Matches	4	4

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Public Health Microbiologist									
1	City and County of San Francisco	Microbiologist II	\$ 122,330	\$ 148,668	-17.4%	\$ 122,800	7/1/2021	1/8/2022	.50%
2	County of Ventura ¹	[Microbiologist III/ Public Health Lab Director]	\$ 82,838	\$ 116,066	-0.7%	\$ 115,253	unknown	unknown	unknown
3	County of Los Angeles	Public Health Microbiology Supervisor I	\$ 87,303	\$ 117,649	-3.8%	\$ 113,179	1/1/2021	unknown	unknown
4	County of Contra Costa	Public Health Laboratory Manager	\$ 101,039	\$ 122,814	-11.1%	\$ 109,181	7/1/2021	unknown	unknown
5	County of San Mateo	Supervising Public Health Microbiologist	\$ 104,289	\$ 130,393	-17.5%	\$ 107,574	10/4/2020	unknown	unknown
7	County of Orange	Supervising Public Health Microbiologist	\$ 78,374	\$ 105,622	-2.0%	\$ 103,510	7/2/2021	7/1/2022	3.50%
8	County of Riverside	Supervising Public Health Microbiologist	\$ 68,571	\$ 101,568	1.9%	\$ 103,497	5/1/2021	5/1/2022	2.00%
9	County of Kern	Supervising Microbiologist	\$ 83,532	\$ 101,976	1.2%	\$ 103,200	4/21/2021	unknown	unknown
10	County of Sacramento	Supervising Public Health Microbiologist	\$ 82,539	\$ 100,349	0.1%	\$ 100,449	6/21/2020	unknown	unknown
11	County of San Bernardino	Supervising Public Health Microbiologist	\$ 70,990	\$ 97,781	1.9%	\$ 99,639	7/31/2021	7/30/2022	3.00%
12	County of Alameda	Supervising Microbiologist	\$ 90,022	\$ 108,930	-11.4%	\$ 96,512	12/27/2020	unknown	unknown
13	County of Fresno	Senior Public Health Microbiologist	\$ 75,452	\$ 91,702	4.7%	\$ 96,012	4/19/2021	unknown	unknown
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 107,276	\$ 103,504
% County of San Diego Above/Below	-3.1%	0.6%
Number of Matches	12	12

N/C - Non Comparator

1 - County of Ventura: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Sheriff's Emergency Services Dispatcher									
1	County of Santa Clara	Supervising Communications Dispatcher	\$ 133,078	\$ 161,772	-16.8%	\$ 134,594	6/28/2021	6/27/2022	3.00%
2	County of Riverside	Sheriff's Communications Supervisor B	\$ 66,091	\$ 117,907	1.9%	\$ 120,147	5/1/2021	5/1/2022	2.00%
3	County of Ventura	Supervising Sheriff's Technical Communications Specialist	\$ 81,559	\$ 114,195	-0.7%	\$ 113,396	12/26/2020	12/27/2021	2.00%
4	City and County of San Francisco	Public Safety Communications Supervisor	\$ 107,926	\$ 131,118	-17.4%	\$ 108,303	7/1/2021	1/8/2022	.50%
5	County of San Mateo	Supervising Communications Dispatcher	\$ 104,747	\$ 130,913	-17.5%	\$ 108,003	12/13/2020	unknown	unknown
6	County of Orange	Supervising Radio Dispatcher	\$ 74,235	\$ 100,027	-2.0%	\$ 98,027	7/2/2021	7/1/2022	3.50%
8	County of Alameda	Emergency Services Dispatch Supervisor	\$ 90,646	\$ 108,805	-11.4%	\$ 96,401	11/1/2020	10/31/2021	2.00%
9	County of Contra Costa	Supervising Sheriff's Dispatcher	\$ 86,449	\$ 107,706	-11.1%	\$ 95,751	7/1/2021	7/1/2022	5.00%
10	County of San Bernardino	Sheriff's Supervising Communications Dispatcher	\$ 62,130	\$ 85,426	1.9%	\$ 87,049	7/31/2021	7/30/2022	3.00%
11	County of Los Angeles	Supervising Public Response Dispatcher	\$ 63,684	\$ 85,810	-3.8%	\$ 82,549	1/1/2021	unknown	unknown
12	County of Fresno	Supervising Communications Dispatcher	\$ 64,012	\$ 77,818	4.7%	\$ 81,475	4/19/2021	unknown	unknown
13	County of Kern	Sheriff's Dispatch Supervisor	\$ 56,892	\$ 69,456	1.2%	\$ 70,289	4/21/2021	unknown	unknown
14	County of Sacramento	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 108,256	\$ 97,214
% County of San Diego Above/Below	-12.0%	-0.5%
Number of Matches	12	12

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Stores & Mail System Specialist, Auditor & Controller									
2	County of Ventura	Warehouse Coordinator	\$ 39,310	\$ 55,039	-0.7%	\$ 54,654	12/26/2020	12/27/2021	2.00%
3	County of Kern	Supervising Mail Clerk	\$ 31,896	\$ 38,940	1.2%	\$ 39,407	4/21/2021	unknown	unknown
4	City and County of San Francisco	N/C							
5	County of Alameda	N/C							
6	County of Contra Costa	N/C							
7	County of Fresno	N/C							
8	County of Los Angeles	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 46,989	\$ 47,030
% County of San Diego Above/Below	22.9%	22.8%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Treasurer-Tax Collector Specialist									
1	County of Alameda ¹	[Treasurer-Tax Collector's Specialist III/ Treasurer-Tax Collector Supervisor]	\$ 73,399	\$ 87,612	-11.4%	\$ 77,624	12/27/2020	12/26/2021	3.00%
2	County of Santa Clara	Supervising Tax Collection Clerk	\$ 76,685	\$ 93,186	-16.8%	\$ 77,531	6/28/2021	6/27/2022	3.00%
3	County of San Mateo	Supervising Cash Management Specialist	\$ 73,235	\$ 91,539	-17.5%	\$ 75,520	10/4/2020	unknown	unknown
4	County of Los Angeles	Tax Services Supervisor I	\$ 49,887	\$ 69,075	-3.8%	\$ 66,450	1/1/2021	unknown	unknown
5	County of Sacramento	Accounting Technician	\$ 53,495	\$ 65,020	0.1%	\$ 65,085	6/21/2020	unknown	unknown
7	City and County of San Francisco	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of Orange	N/C							
12	County of Riverside	N/C							
13	County of San Bernardino	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 87,612	\$ 75,520
% County of San Diego Above/Below	-45.2%	-25.2%
Number of Matches	5	5

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising Vector Ecologist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Diego	Supervising Vector Ecologist	\$ 87,360	\$ 107,390		\$ 107,390	6/18/2021	unknown	unknown
2	County of Santa Clara	Vector Control Operations Supervisor	\$ 99,083	\$ 120,444	-16.8%	\$ 100,210	6/28/2021	6/27/2022	3.00%
3	County of Alameda	Vector Control Biologist Supervisor	\$ 85,842	\$ 104,333	-11.4%	\$ 92,439	12/27/2020	12/26/2021	3.00%
4	City and County of San Francisco	N/C							
5	County of Contra Costa	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Los Angeles	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 112,389	\$ 96,324
% County of San Diego Above/Below	-4.7%	10.3%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising, Trial Support Unit									
1	County of Sacramento	Supervising Forensic Multimedia Examiner	\$ 79,031	\$ 96,069	0.1%	\$ 96,165	6/21/2021	unknown	unknown
3	City and County of San Francisco	N/C							
4	County of Alameda	N/C							
5	County of Contra Costa	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Los Angeles	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 96,069	\$ 96,165
% County of San Diego Above/Below	0.1%	-0.0%
Number of Matches	1	1

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Supervising, Vector Control Technician									
1	County of Riverside	Supervising Environmental Health Specialist	\$ 69,534	\$ 102,933	1.9%	\$ 104,888	5/1/2021	5/1/2022	2.00%
3	County of San Bernardino	Supervising Vector Control Technician	\$ 51,771	\$ 71,032	1.9%	\$ 72,382	7/31/2021	7/30/2022	3.00%
4	City and County of San Francisco	N/C							
5	County of Alameda	N/C							
6	County of Contra Costa	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Los Angeles	N/C							
10	County of Orange	N/C							
11	County of Sacramento	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 86,982	\$ 88,635
% County of San Diego Above/Below	-16.1%	-18.3%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Tax Payment Enforcement Officer									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Investigator, Tax Collector	\$ 92,352	\$ 112,216	-17.4%	\$ 92,690	7/1/2021	1/8/2022	.50%
2	County of Kern	Tax Collector's Investigator II	\$ 62,244	\$ 75,984	1.2%	\$ 76,896	4/21/2021	unknown	unknown
3	County of Alameda	Collection Enforcement Deputy II	\$ 63,083	\$ 76,733	-11.4%	\$ 67,985	6/27/2021	6/26/2022	3.25%
4	County of San Mateo	Revenue Collector II	\$ 65,768	\$ 82,179	-17.5%	\$ 67,798	10/4/2020	unknown	unknown
5	County of Santa Clara	Revenue Collections Officer	\$ 65,859	\$ 79,535	-16.8%	\$ 66,173	6/14/2021	6/13/2022	3.00%
6	County of Orange	Collection Officer II	\$ 49,442	\$ 66,602	-2.0%	\$ 65,270	7/2/2021	7/1/2022	3.50%
7	County of San Diego	Tax Payment Enforcement Officer	\$ 52,790	\$ 64,834		\$ 64,834	6/18/2021	unknown	unknown
8	County of Contra Costa	Tax Compliance Officer	\$ 53,024	\$ 64,451	-11.1%	\$ 57,297	7/1/2021	unknown	unknown
9	County of Sacramento	Collection Services Agent II	\$ 46,354	\$ 56,355	0.1%	\$ 56,411	6/21/2020	unknown	unknown
10	County of Fresno	N/C							
11	County of Los Angeles	N/C							
12	County of Riverside	N/C							
13	County of San Bernardino	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 76,358	\$ 66,986
% County of San Diego Above/Below	-17.8%	-3.3%
Number of Matches	8	8

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Tax Payment Processor									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Los Angeles	Tax Services Clerk II	\$ 40,251	\$ 55,603	-3.8%	\$ 53,490	1/1/2021	unknown	unknown
2	County of Sacramento	Account Clerk II	\$ 41,969	\$ 51,010	0.1%	\$ 51,061	6/21/2020	unknown	unknown
3	County of San Diego	Tax Payment Processor	\$ 39,603	\$ 48,693		\$ 48,693	6/18/2021	unknown	unknown
4	County of Orange	Property Tax Technician	\$ 36,858	\$ 48,485	-2.0%	\$ 47,515	7/2/2021	7/1/2022	3.50%
5	County of Kern	Fiscal Support Technician	\$ 32,868	\$ 40,128	1.2%	\$ 40,610	4/21/2021	unknown	unknown
6	City and County of San Francisco	N/C							
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Riverside	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results		Top Annual	Adjusted Top Annual
Median of Comparators		\$ 49,747	\$ 49,288
% County of San Diego Above/Below		-2.2%	-1.2%
Number of Matches		4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Technical Writer									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Technical Writer	\$ 125,222	\$ 152,212	-16.8%	\$ 126,641	6/14/2021	6/13/2022	3.00%
2	County of San Diego	Technical Writer	\$ 73,133	\$ 89,918		\$ 89,918	6/18/2021	unknown	unknown
3	County of Riverside	Staff Writer	\$ 63,565	\$ 79,991	1.9%	\$ 81,511	7/1/2021	7/14/2022	2.00%
4	City and County of San Francisco	N/C							
5	County of Alameda	N/C							
6	County of Contra Costa	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Los Angeles	N/C							
10	County of Orange	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 116,102	\$ 104,076
% County of San Diego Above/Below	-29.1%	-15.7%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Telecommunications Technician III									
1	County of San Mateo	IS Communications Specialist - Senior	\$ 114,377	\$ 142,956	-17.5%	\$ 117,938	10/4/2020	unknown	unknown
2	County of Alameda	Senior Telecommunications Technician	\$ 93,600	\$ 114,130	-11.4%	\$ 101,119	12/27/2020	unknown	unknown
3	County of Santa Clara	Senior Telecommunications Technician	\$ 92,082	\$ 111,413	-16.8%	\$ 92,696	6/14/2021	6/13/2022	3.00%
4	County of Ventura	Telecommunications Network Specialist III	\$ 72,990	\$ 91,905	-0.7%	\$ 91,262	1/10/2021	1/9/2022	2.00%
5	County of Contra Costa	Senior Communications Equipment Specialist	\$ 83,772	\$ 101,826	-11.1%	\$ 90,523	7/1/2021	unknown	unknown
7	County of Orange	Senior Communications Technician	\$ 64,418	\$ 86,840	-2.0%	\$ 85,103	7/2/2021	7/1/2022	3.50%
8	County of Kern	Communications Technician III	\$ 57,756	\$ 70,500	1.2%	\$ 71,346	4/21/2021	unknown	unknown
9	City and County of San Francisco	N/C							
10	County of Fresno	N/C							
11	County of Los Angeles	N/C							
12	County of Riverside	N/C							
13	County of Sacramento	N/C							
14	County of San Bernardino	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 101,826	\$ 91,262
% County of San Diego Above/Below	-13.0%	-1.3%
Number of Matches	7	7

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Telecommunications Technician IV									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Mateo	IS Communications Supervisor	\$ 121,802	\$ 152,232	-17.5%	\$ 125,592	10/4/2020	unknown	unknown
2	City and County of San Francisco	Telecommunications Technician Supervisor	\$ 119,600	\$ 145,418	-17.4%	\$ 120,115	7/1/2021	1/8/2022	.50%
3	County of Contra Costa ¹	[Senior Communications Equipment Specialist/Telecommunications Manager]	\$ 98,163	\$ 119,318	-11.1%	\$ 106,074	7/1/2021	unknown	unknown
4	County of Sacramento	Telecommunications Systems Supervisor	\$ 84,230	\$ 102,375	0.1%	\$ 102,477	6/21/2020	unknown	unknown
5	County of Orange	Supervising Communications Technician	\$ 75,691	\$ 101,837	-2.0%	\$ 99,800	7/2/2021	7/1/2022	3.50%
6	County of San Diego	Telecommunications Technician IV	\$ 80,621	\$ 99,050		\$ 99,050	6/18/2021	unknown	unknown
7	County of Ventura	Telecommunications Network Supervisor	\$ 63,527	\$ 89,151	-0.7%	\$ 88,527	12/26/2020	12/27/2021	2.00%
8	County of Kern	Telecommunications Engineer	\$ 65,424	\$ 79,872	1.2%	\$ 80,830	4/21/2021	unknown	unknown
9	County of Alameda	N/C							
10	County of Fresno	N/C							
11	County of Los Angeles	N/C							
12	County of Riverside	N/C							
13	County of San Bernardino	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 102,375	\$ 102,477
% County of San Diego Above/Below	-3.4%	-3.5%
Number of Matches	7	7

N/C - Non Comparator

1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Toxicologist I									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Mateo	Criminalist I	\$ 86,859	\$ 108,532	-17.5%	\$ 89,539	12/13/2020	12/12/2021	2-4%
2	County of San Diego	Toxicologist I	\$ 66,726	\$ 82,014		\$ 82,014	6/18/2021	unknown	unknown
3	County of Contra Costa	Forensic Toxicologist I	\$ 79,827	\$ 88,009	-11.1%	\$ 78,240	7/1/2021	unknown	unknown
4	City and County of San Francisco	N/C							
5	County of Alameda	N/C							
6	County of Fresno	N/C							
7	County of Kern	N/C							
8	County of Los Angeles	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 98,271	\$ 83,889
% County of San Diego Above/Below	-19.8%	-2.3%
Number of Matches	2	2

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Toxicologist II									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	City and County of San Francisco	Forensic Toxicologist	\$ 113,074	\$ 137,462	-17.4%	\$ 113,544	7/1/2021	1/8/2022	.50%
2	County of San Mateo	Criminalist II	\$ 108,158	\$ 135,197	-17.5%	\$ 111,538	12/13/2020	12/12/2021	2-4%
3	County of San Diego	Toxicologist II	\$ 81,453	\$ 100,152		\$ 100,152	6/18/2021	unknown	unknown
4	County of Contra Costa	Forensic Toxicologist II	\$ 86,922	\$ 105,654	-11.1%	\$ 93,926	7/1/2021	unknown	unknown
5	County of Los Angeles	Toxicologist	\$ 57,555	\$ 77,559	-3.8%	\$ 74,612	1/1/2021	unknown	unknown
6	County of Alameda	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 120,426	\$ 102,732
% County of San Diego Above/Below	-20.2%	-2.6%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Toxicologist III									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Mateo ¹	[Criminalist II/Supervising Criminalist]	\$ 114,117	\$ 142,633	-17.5%	\$ 117,672	12/13/2020	12/12/2021	2-4%
2	County of San Diego	Toxicologist III	\$ 92,914	\$ 114,234		\$ 114,234	6/18/2021	unknown	unknown
3	County of Contra Costa	Forensic Toxicologist III	\$ 100,640	\$ 122,328	-11.1%	\$ 108,750	7/1/2021	unknown	unknown
4	County of Los Angeles	Senior Toxicologist	\$ 63,840	\$ 86,020	-3.8%	\$ 82,752	1/1/2021	unknown	unknown
5	City and County of San Francisco	N/C							
6	County of Alameda	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Orange	N/C							
10	County of Riverside	N/C							
11	County of Sacramento	N/C							
12	County of San Bernardino	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 122,328	\$ 108,750
% County of San Diego Above/Below	-7.1%	4.8%
Number of Matches	3	3

N/C - Non Comparator

1 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Treasurer-Tax Collector Specialist									
1	County of Alameda ¹	[Treasurer-Tax Collector's Specialist II/ Deferred Compensation Technician]	\$ 64,428	\$ 78,216	-11.4%	\$ 69,299	6/27/2021	6/26/2022	3.25%
2	County of San Mateo	Cash Management Specialist	\$ 61,608	\$ 77,021	-17.5%	\$ 63,542	10/4/2020	unknown	unknown
3	County of Santa Clara	Revenue Collections Clerk	\$ 53,781	\$ 64,908	-16.8%	\$ 54,004	6/14/2021	6/13/2022	3.00%
4	County of Los Angeles	Tax Services Clerk II	\$ 40,251	\$ 55,603	-3.8%	\$ 53,490	1/1/2021	unknown	unknown
5	County of Sacramento	Account Clerk II	\$ 41,969	\$ 51,010	0.1%	\$ 51,061	6/21/2020	unknown	unknown
7	City and County of San Francisco	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of Orange	N/C							
12	County of Riverside	N/C							
13	County of San Bernardino	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 64,908	\$ 54,004
% County of San Diego Above/Below	-39.4%	-16.0%
Number of Matches	5	5

N/C - Non Comparator

1 - County of Alameda: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Trial Support Specialist									
2	County of Orange	Video Producer	\$ 64,813	\$ 87,381	-2.0%	\$ 85,633	7/2/2021	7/1/2022	3.50%
3	County of Sacramento	Forensic Multimedia Examiner II	\$ 65,354	\$ 79,407	0.1%	\$ 79,486	6/21/2021	unknown	unknown
4	County of Santa Clara	Investigative Graphic/Media Specialist	\$ 72,355	\$ 87,454	-16.8%	\$ 72,761	6/14/2021	6/13/2022	3.00%
5	County of Kern	Investigative Technician II	\$ 46,608	\$ 56,892	1.2%	\$ 57,575	4/21/2021	unknown	unknown
6	City and County of San Francisco	N/C							
7	County of Alameda	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Los Angeles	N/C							
11	County of Riverside	N/C							
12	County of San Bernardino	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 83,394	\$ 76,124
% County of San Diego Above/Below	8.9%	16.9%
Number of Matches	4	4

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Utilization Review Quality Improvement Specialist

1	County of Santa Clara	Quality Improvement Coordinator - SCVMC	\$ 153,762	\$ 196,298	-16.8%	\$ 163,320	6/28/2021	6/27/2022	3.00%
2	County of Contra Costa	Utilization Review Coordinator	\$ 135,348	\$ 164,517	-11.1%	\$ 146,256	7/1/2021	unknown	unknown
3	County of San Mateo ¹	Clinical Nurse	\$ 135,905	\$ 160,635	-17.5%	\$ 132,524	2/7/2021	unknown	unknown
4	County of Alameda	Clinical Review Specialist	\$ 102,259	\$ 120,541	-11.4%	\$ 106,799	6/27/2021	6/26/2022	3.25%
5	County of Sacramento	Medical Case Management Nurse	\$ 85,817	\$ 104,337	0.1%	\$ 104,441	8/2/2020	unknown	unknown
6	County of Fresno	Utilization Review Specialist	\$ 81,458	\$ 97,968	4.7%	\$ 102,572	11/2/2020	unknown	unknown
8	City and County of San Francisco	N/C							
9	County of Kern	N/C							
10	County of Los Angeles	N/C							
11	County of Orange	N/C							
12	County of Riverside	N/C							
13	County of San Bernardino	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 140,588	\$ 119,662
% County of San Diego Above/Below	-41.3%	-20.3%
Number of Matches	6	6

N/C - Non Comparator

1 - County of San Mateo: Bottom of range is step 2.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Utilization Review Quality Improvement Supervisor									
1	County of Contra Costa ¹	[Utilization Review Coordinator/Utilization Review Manager]	\$ 143,806	\$ 174,798	-11.1%	\$ 155,395	7/1/2021	unknown	unknown
2	County of San Mateo ²	[Clinical Nurse/Quality Assurance Manager]	\$ 127,294	\$ 159,887	-17.5%	\$ 131,906	2/7/2021	unknown	unknown
3	County of Alameda	Clinical Review Specialist Supervisor	\$ 109,803	\$ 134,805	-11.4%	\$ 119,437	12/27/2020	unknown	unknown
4	County of Sacramento	Supervising Medical Case Management Nurse	\$ 96,319	\$ 117,074	0.1%	\$ 117,191	6/21/2020	unknown	unknown
6	City and County of San Francisco	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Los Angeles	N/C							
10	County of Orange	N/C							
11	County of Riverside	N/C							
12	County of San Bernardino	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 147,346	\$ 125,672
% County of San Diego Above/Below	-41.1%	-20.3%
Number of Matches	4	4

N/C - Non Comparator

1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

2 - County of San Mateo: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Vector Control Technician									
1	County of Alameda	Vector Control Officer	\$ 67,069	\$ 80,041	-11.4%	\$ 70,916	6/27/2021	6/26/2022	3.25%
2	County of Santa Clara	Vector Control Technician II	\$ 69,688	\$ 84,198	-16.8%	\$ 70,053	6/14/2021	6/13/2022	3.00%
3	County of Ventura	Resource Management Agency Technician II - Environmental Health	\$ 48,265	\$ 67,402	-0.7%	\$ 66,930	12/26/2020	12/27/2021	2.00%
4	County of Riverside	Environmental Health Technician II	\$ 38,982	\$ 60,876	1.9%	\$ 62,032	5/1/2021	5/1/2022	2.00%
6	County of San Bernardino	Vector Control Technician I	\$ 43,597	\$ 59,925	1.9%	\$ 61,063	7/31/2021	7/30/2022	3.00%
7	City and County of San Francisco	N/C							
8	County of Contra Costa	N/C							
9	County of Fresno	N/C							
10	County of Kern	N/C							
11	County of Los Angeles	N/C							
12	County of Orange	N/C							
13	County of Sacramento	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 67,402	\$ 66,930
% County of San Diego Above/Below	-9.1%	-8.4%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Vector Control Technician Aide									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Santa Clara	Vector Control Technician I	\$ 60,411	\$ 72,956	-16.8%	\$ 60,699	6/14/2021	6/13/2022	3.00%
2	County of Riverside	Environmental Health Technician I	\$ 36,977	\$ 57,710	1.9%	\$ 58,807	5/1/2021	5/1/2022	2.00%
3	County of Alameda	Vector Control Officer, Trainee	\$ 61,958	\$ 64,965	-11.4%	\$ 57,559	6/27/2021	6/26/2022	3.25%
4	County of San Bernardino	Vector Control Technician Trainee	\$ 37,710	\$ 50,502	1.9%	\$ 51,462	7/31/2021	7/30/2022	3.00%
5	County of Contra Costa	Vector Control Technician	\$ 42,780	\$ 51,999	-11.1%	\$ 46,227	7/1/2021	unknown	unknown
6	County of San Diego	Vector Control Technician Aide	\$ 40,602	\$ 43,118		\$ 43,118	6/18/2021	unknown	unknown
7	City and County of San Francisco	N/C							
8	County of Fresno	N/C							
9	County of Kern	N/C							
10	County of Los Angeles	N/C							
11	County of Orange	N/C							
12	County of Sacramento	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 57,710	\$ 57,559
% County of San Diego Above/Below	-33.8%	-33.5%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Vector Ecologist									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Bernardino	Vector Ecologist	\$ 68,245	\$ 96,262	1.9%	\$ 98,091	3/13/2021	3/26/2022	3.00%
2	County of San Diego	Vector Ecologist	\$ 77,667	\$ 95,493		\$ 95,493	6/18/2021	unknown	unknown
3	County of Santa Clara	Vector Control Ecologist	\$ 92,991	\$ 112,522	-16.8%	\$ 93,618	6/14/2021	6/13/2022	3.00%
4	County of Alameda	Vector Control Biologist	\$ 77,808	\$ 94,559	-11.4%	\$ 83,779	6/27/2021	6/26/2022	3.25%
5	City and County of San Francisco	N/C							
6	County of Contra Costa	N/C							
7	County of Fresno	N/C							
8	County of Kern	N/C							
9	County of Los Angeles	N/C							
10	County of Orange	N/C							
11	County of Riverside	N/C							
12	County of Sacramento	N/C							
13	County of San Mateo	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 96,262	\$ 93,618
% County of San Diego Above/Below	-0.8%	2.0%
Number of Matches	3	3

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Veterans Services Representative									
1	City and County of San Francisco	Veterans Claims Representative	\$ 87,542	\$ 106,418	-17.4%	\$ 87,901	7/1/2021	1/8/2022	.50%
2	County of San Mateo	Veterans Services Representative II	\$ 79,413	\$ 99,256	-17.5%	\$ 81,886	10/4/2020	unknown	unknown
3	County of Contra Costa	Veterans Service Representative II	\$ 69,328	\$ 84,269	-11.1%	\$ 74,915	7/1/2021	unknown	unknown
4	County of Santa Clara	Veteran Services Representative II	\$ 72,933	\$ 88,207	-16.8%	\$ 73,388	6/14/2021	6/13/2022	3.00%
6	County of San Bernardino	Veterans Service Officer II	\$ 46,904	\$ 64,501	1.9%	\$ 65,726	7/31/2021	7/30/2022	3.00%
7	County of Orange	Veterans Claims Representative	\$ 49,442	\$ 66,602	-2.0%	\$ 65,270	7/2/2021	7/1/2022	3.50%
8	County of Riverside	Veterans Services Representative II	\$ 46,959	\$ 63,058	1.9%	\$ 64,256	5/1/2021	5/1/2022	2.00%
9	County of Los Angeles	Veterans Claims Assistant II	\$ 49,399	\$ 66,566	-3.8%	\$ 64,037	1/1/2021	unknown	unknown
10	County of Ventura	HS Veterans Claims Officer II	\$ 45,030	\$ 60,046	-0.7%	\$ 59,626	12/26/2020	12/27/2021	2.00%
11	County of Alameda	Veterans Service Representative	\$ 56,676	\$ 67,227	-11.4%	\$ 59,563	6/27/2021	6/26/2022	3.25%
12	County of Sacramento	Veterans Claims Representative	\$ 45,727	\$ 55,603	0.1%	\$ 55,659	6/21/2020	unknown	unknown
13	County of Kern	Veterans Service Representative I	\$ 43,248	\$ 52,800	1.2%	\$ 53,434	4/21/2021	unknown	unknown
14	County of Fresno	Veterans Services Representative II	\$ 41,626	\$ 50,596	4.7%	\$ 52,974	4/19/2021	unknown	unknown

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 66,566	\$ 64,256
% County of San Diego Above/Below	-0.9%	2.6%
Number of Matches	13	13

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Veterinarian									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of Riverside	Chief Veterinarian	\$ 119,076	\$ 201,223	1.9%	\$ 205,046	7/1/2021	7/14/2022	2.00%
2	County of Orange	Veterinarian	\$ 120,931	\$ 163,072	-2.0%	\$ 159,811	7/2/2021	7/1/2022	3.50%
3	County of Los Angeles	Veterinarian	\$ 116,205	\$ 165,343	-3.8%	\$ 159,060	1/1/2021	unknown	unknown
4	County of Kern	Veterinarian	\$ 113,232	\$ 138,300	1.2%	\$ 139,960	4/21/2021	unknown	unknown
5	County of Ventura	Veterinarian	\$ 98,009	\$ 137,213	-0.7%	\$ 136,253	unknown	unknown	unknown
6	City and County of San Francisco	Shelter Veterinarian	\$ 119,990	\$ 156,832	-17.4%	\$ 129,543	7/1/2021	1/8/2022	.50%
7	County of Sacramento	Veterinarian	\$ 102,771	\$ 124,904	0.1%	\$ 125,029	6/21/2020	unknown	unknown
8	County of San Diego	Veterinarian	\$ 100,901	\$ 124,051		\$ 124,051	6/18/2021	unknown	unknown
9	County of Contra Costa	Animal Shelter Veterinarian	\$ 112,960	\$ 133,304	-11.1%	\$ 118,507	7/1/2021	unknown	unknown
10	County of Santa Clara	Veterinarian	\$ 111,833	\$ 135,972	-16.8%	\$ 113,128	6/14/2021	6/13/2022	3.00%
11	County of Alameda	N/C							
12	County of Fresno	N/C							
13	County of San Bernardino	N/C							
14	County of San Mateo	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 138,300	\$ 136,253
% County of San Diego Above/Below	-11.5%	-9.8%
Number of Matches	9	9

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Victim Advocate									
2	County of Santa Clara	Victim/Witness Advocate	\$ 60,773	\$ 73,867	-16.8%	\$ 61,457	6/14/2021	6/13/2022	3.00%
3	County of Los Angeles	Victim Services Representative II	\$ 46,922	\$ 63,216	-3.8%	\$ 60,814	1/1/2021	unknown	unknown
4	County of Riverside	Victim Services Advocate I	\$ 40,280	\$ 59,560	1.9%	\$ 60,692	5/1/2021	5/1/2022	2.00%
5	County of San Bernardino	Victim Advocate I	\$ 42,536	\$ 58,489	1.9%	\$ 59,601	7/31/2021	7/30/2022	3.00%
6	County of Contra Costa	Victim and Witness Assistance Program Specialist	\$ 52,867	\$ 64,260	-11.1%	\$ 57,127	7/1/2021	unknown	unknown
7	County of San Mateo	District Attorney's Office Victim Advocate I	\$ 54,557	\$ 68,160	-17.5%	\$ 56,232	10/4/2020	unknown	unknown
8	County of Kern	Victim/Witness Services Specialist II	\$ 45,456	\$ 55,500	1.2%	\$ 56,166	4/21/2021	unknown	unknown
9	County of Ventura	Victim Advocate II	\$ 39,141	\$ 54,890	-0.7%	\$ 54,506	12/26/2020	12/27/2021	2.00%
10	County of Sacramento	Victim Witness Claims Specialist	\$ 44,057	\$ 53,557	0.1%	\$ 53,611	6/21/2020	unknown	unknown
11	County of Fresno	Victim-Witness Advocate	\$ 40,898	\$ 49,738	4.7%	\$ 52,076	4/19/2021	unknown	unknown
12	City and County of San Francisco	N/C							
13	County of Alameda	N/C							
14	County of Orange	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 59,025	\$ 56,680
% County of San Diego Above/Below	17.6%	20.9%
Number of Matches	10	10

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Victim/Witness Assist Program Manager									
1	County of Los Angeles	Program Administrator, Victim-Witness Assistance	\$ 92,863	\$ 125,140	-3.8%	\$ 120,385	1/1/2021	unknown	unknown
2	County of Riverside	Victim Services Assistant Director	\$ 70,620	\$ 106,963	1.9%	\$ 108,995	7/1/2021	7/14/2022	2.00%
3	County of San Mateo	Victim Programs Services Manager	\$ 104,747	\$ 130,913	-17.5%	\$ 108,003	12/13/2020	unknown	unknown
4	City and County of San Francisco	Assistant Chief Victim/Witness Investigator	\$ 104,806	\$ 127,426	-17.4%	\$ 105,254	7/1/2021	1/8/2022	.50%
5	County of Sacramento	Victim and Witness Assistance Program Coordinator	\$ 95,234	\$ 104,985	0.1%	\$ 105,090	6/21/2020	unknown	unknown
6	County of Contra Costa	Victim and Witness Assistance Program Manager	\$ 95,310	\$ 115,850	-11.1%	\$ 102,991	7/1/2021	unknown	unknown
7	County of San Bernardino	Victim Services Assistant Chief	\$ 64,480	\$ 88,608	1.9%	\$ 90,292	7/31/2021	7/30/2022	3.00%
9	County of Alameda	N/C							
10	County of Fresno	N/C							
11	County of Kern	N/C							
12	County of Orange	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 115,850	\$ 105,254
% County of San Diego Above/Below	-31.8%	-19.7%
Number of Matches	7	7

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Victim/Witness Assistance Program Supervisor									
1	City and County of San Francisco	Victim/Witness Investigator III	\$ 96,512	\$ 117,364	-17.4%	\$ 96,943	7/1/2021	1/8/2022	.50%
2	County of Santa Clara	Supervising Victim/Witness Advocate	\$ 91,495	\$ 111,209	-16.8%	\$ 92,526	6/28/2021	6/27/2022	3.00%
3	County of San Bernardino	Supervising Victim Advocate	\$ 58,427	\$ 80,309	1.9%	\$ 81,835	7/31/2021	7/30/2022	3.00%
5	County of Contra Costa ¹	[Victim and Witness Program Specialist/Victim and Witness Program Manager]	\$ 74,088	\$ 90,055	-11.1%	\$ 80,059	7/1/2021	unknown	unknown
6	County of San Mateo	District Attorney's Office Supervising Victim Advocate	\$ 75,024	\$ 93,806	-17.5%	\$ 77,390	10/4/2020	unknown	unknown
7	County of Los Angeles	Supervising Victim Services Representative	\$ 55,194	\$ 74,382	-3.8%	\$ 71,555	1/1/2021	unknown	unknown
8	County of Riverside	Victim Services Supervisor	\$ 47,291	\$ 69,928	1.9%	\$ 71,257	5/1/2021	5/1/2022	2.00%
9	County of Kern	Program Supervisor	\$ 50,988	\$ 62,244	1.2%	\$ 62,991	4/21/2021	unknown	unknown
10	County of Ventura	Victim Advocate III	\$ 43,644	\$ 61,374	-0.7%	\$ 60,945	12/26/2020	12/27/2021	2.00%
11	County of Alameda	N/C							
12	County of Fresno	N/C							
13	County of Orange	N/C							
14	County of Sacramento	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 80,309	\$ 77,390
% County of San Diego Above/Below	0.1%	3.8%
Number of Matches	9	9

N/C - Non Comparator

1 - County of Contra Costa: Span of Responsibility Match: This hybrid match represents that the duties are bridged by a higher and lower level classification at the comparator agency. The salary displayed is an average of the matches.

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Wastewater Facilities Supervisor									
1	County of Sacramento	Wastewater Treatment Plant Operations Supervisor	\$ 116,991	\$ 128,976	0.1%	\$ 129,105	6/21/2020	unknown	unknown
2	County of Ventura	Water/Wastewater Services Supervisor	\$ 79,783	\$ 107,707	-0.7%	\$ 106,953	12/26/2020	12/27/2021	2.00%
3	County of Los Angeles	Wastewater Treatment Plant Supervisor	\$ 108,361	\$ 108,361	-3.8%	\$ 104,243	1/1/2021	unknown	unknown
4	County of Fresno	Supervising Water/Wastewater Specialist	\$ 81,042	\$ 98,514	4.7%	\$ 103,144	4/19/2021	unknown	unknown
5	County of San Bernardino	Water and Sanitation Supervisor (SD)	\$ 69,389	\$ 95,638	1.9%	\$ 97,456	7/18/2020	unknown	unknown
7	County of Kern	Wastewater Specialist I	\$ 54,396	\$ 66,408	1.2%	\$ 67,205	4/21/2021	unknown	unknown
8	City and County of San Francisco	N/C							
9	County of Alameda	N/C							
10	County of Contra Costa	N/C							
11	County of Orange	N/C							
12	County of Riverside	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 103,111	\$ 103,694
% County of San Diego Above/Below	-8.0%	-8.6%
Number of Matches	6	6

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Wastewater Plant Operator III									
1	County of Sacramento	Senior Wastewater Treatment Plant Operator	\$ 97,489	\$ 107,469	0.1%	\$ 107,576	6/21/2020	unknown	unknown
2	County of Fresno	Water/Wastewater Specialist III	\$ 70,512	\$ 85,722	4.7%	\$ 89,751	4/19/2021	unknown	unknown
3	County of Ventura	Senior Water/Wastewater Services Worker	\$ 66,486	\$ 89,756	-0.7%	\$ 89,128	12/26/2020	12/27/2021	2.00%
4	County of San Bernardino	Treatment Plant Operator IV (SD)	\$ 60,923	\$ 81,952	1.9%	\$ 83,509	9/26/2020	10/9/2021	2.50%
6	County of Kern	Wastewater Treatment Plant Operator III	\$ 50,472	\$ 61,620	1.2%	\$ 62,359	4/21/2021	unknown	unknown
7	City and County of San Francisco	N/C							
8	County of Alameda	N/C							
9	County of Contra Costa	N/C							
10	County of Los Angeles	N/C							
11	County of Orange	N/C							
12	County of Riverside	N/C							
13	County of San Mateo	N/C							
14	County of Santa Clara	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	\$ 85,722	\$ 89,128
% County of San Diego Above/Below	-3.8%	-7.9%
Number of Matches	5	5

N/C - Non Comparator

County of San Diego
Appendix II: Market Compensation Findings
July 2021

Watershed Manager									
Rank	Comparator Agency	Classification Title	Annual Minimum	Top Annual	Geographic Differential	Adjusted Top Annual	Salary Effective Date	Next Salary Increase	Next Percentage Increase
1	County of San Diego	Watershed Manager	\$ 77,917	\$ 95,805		\$ 95,805	6/18/2021	unknown	unknown
2	City and County of San Francisco	N/C							
3	County of Alameda	N/C							
4	County of Contra Costa	N/C							
5	County of Fresno	N/C							
6	County of Kern	N/C							
7	County of Los Angeles	N/C							
8	County of Orange	N/C							
9	County of Riverside	N/C							
10	County of Sacramento	N/C							
11	County of San Bernardino	N/C							
12	County of San Mateo	N/C							
13	County of Santa Clara	N/C							
14	County of Ventura	N/C							

Summary Results	Top Annual	Adjusted Top Annual
Median of Comparators	N/A	N/A
% County of San Diego Above/Below	N/A	N/A
Number of Matches	0	0

N/C - Non Comparator



Appendix III

ERI Methodology for Cost of Labor

Methodology

The Geographic Assessor® & Pay Survey

ERi Economic Research Institute was founded over 25 years ago to provide compensation applications for private and public organizations. ERi's applications are available to management, analysts and consultants and are now widely used by client organizations. Subscribers include corporate compensation, relocation, human resources, and other professionals, as well as independent consultants and counselors, and US and Canadian public sector administrators (including military, law enforcement, city/county, state/provincial, and federal government pay administrators).

ERi compiles the most robust salary, cost-of-living, and executive compensation survey data available, with current market data for more than 1,000 industry sectors. The majority of the Fortune 500 and thousands of other small and medium sized organizations rely on ERi data and analytics for compensation and salary planning, relocations, disability determinations, board presentations, and setting branch office salary structures in the United States, Canada, and worldwide.

ERi is a leader in the collection, and analysis of compensation, occupation, and cost-of-living data. All data are employer-provided and come from a variety of sources. Survey data are collected through internally conducted salary surveys and the purchase of third party salary surveys. Additional data are gathered through the digitization of Proxy and 10-K data and Freedom of Information Requests in the US. Compensation data are compiled in terms of mean and median salaries for jobs of similar duties, responsibilities, skills, and functions through an extensive job matching process. **ERi** produces surveys and application analyses by which managers, advisors, and Boards of Directors may make recommendations and/or decisions. **ERi** does not provide fee-for-service consulting; our sole focus is providing valid and reliable information to our subscribers.

Overview

The **Geographic Assessor & Pay Survey** application and databases present in-depth time series regression analyses of base salary and wage differences among and between different cities and areas. ERi researchers have utilized these regression techniques for decades, the difference from the original publication being the extent and quality of survey data that are available today. Geographic cost of labor regressions represent analyses of the demand and supply of labor (as opposed to cost-of-living's reflection of the demand and supply of goods and services). ERi has been collecting and analyzing salary surveys since its founding; over 20 million position incumbents' data are now included in ERi's survey databases. For those interested, we refer the reader to ERi's founder's original published article on this subject:

Thomsen, D. J. (1974). Geographic Differentials in Salaries Within The United States, *Personnel Journal*, 53, 9, 670-4.

Salary/Wage Differentials

The **Geographic Assessor & Pay Survey** application is an easy-to-use program that aids with the assessment of branch location wage and salary competitiveness and the setting of salary structures. ERi's **Geographic Assessor & Pay Survey** application calculates wage and salary differentials between any of over 7,300 North American cities and almost 1,300 European cities.

Cost-of-Living Analyses

The **Geographic Assessor & Pay Survey** application and databases presents cursory cost-of-living information. This information is limited to renters' spending patterns and is intended to provide only a first look at the relative buying power of wages/salaries in different areas. ERi recommends using salary differentials for salary structure adjustments; however, the Geographic Assessor does report summary cost-of-living differentials to develop a more comprehensive picture of a location (or potentially for use in conjunction with the salary differentials).

Statistical Methodology

The **Geographic Assessor & Pay Survey** application consists of linear regression analyses programs. Eight trend lines are created for any area. Local area salary data are compared to the corresponding national salary by job or job family to create a series of differentials per area. A sample of these differentials by job or job family is displayed on the Graphs tab. To create a single differential across jobs (one that can vary by salary level), the average, conditional on salary level, is computed via a simple linear regression (the regression line is also displayed on the Graphs tab). Since these differentials vary both by salary and salary structure, a separate regression is performed for each salary structure. The user only needs to input the salary level for the base location; the program automatically assigns the structure based on the ranges below and returns the corresponding differential.

Structures

These regression equations are expressed in terms of "structures," as follows:

Wage Earner Structure	Min - 24,000
Low Salary Structure	24,000 -36,000
Mid Salary Structure	36,000 - 48,000
High Salary Structure	48,000 - 72,000
Management Salary Structure	72,000 - 108,000
Executive-1 Structure	108,000 - 144,000
Executive-2 Structure	144,000 - 192,000
Executive-3 Structure	192,000+

The Wage/Salary area structures are the formulae resulting from ERI's regression analyses of all available data for the area. The program will automatically assign the correct structures by city on the Two City Comparison table, the Comparison List table, and the Graphs table.

Sources

Data used in the cost-of-labor calculations come from salary survey sources. **ERi** collects available salary survey data for jobs and areas; evaluates survey data for validity and reliability; and compiles mean and median salaries for positions with similar duties, responsibilities, skills, and functions. Because ERI has decades of experience collecting and evaluating salary data, we have refined methods for validating both the source data and results.

Selected FAQs

Who uses the Geographic Assessor application and databases? How do they use it and how should I?

Companies setting salary structures, who pay different rates in different locations, use it. Branch pay differentials allow you to take advantage of the differing labor markets to minimize operating costs while maintaining the ability to attract, retain, and motivate employees in each area. Most often, companies use the labor cost differentials reported by the **Geographic Assessor** to make data-based decisions and manage complexity by adjusting existing structures based on local labor cost differentials or, when the differentials are sufficiently large, to develop new structures. Companies also use the labor cost differentials to research general overall labor cost differences associated with opening new branch offices. In addition to using the **Geographic Assessor** with salary structures, there are other uses of labor cost differentials, such as to adjust salary survey results directly, say from state or region to the national equivalent (or the inverse) when data at the desired geographic level or area is not directly available.

While these are all valid uses of labor cost differentials per se, each planning situation is different. So it is important to keep in mind the current planning context such as consistency with prior methods, compensation philosophy, and organizational culture, and so on when deciding how to best leverage the differentials reported. We at ERI are happy to answer questions on the data and general uses, but we do not do consulting.

In terms of specific users, a number of voluntary subscriber disclosures about reliance on ERI data are cited in customer testimonials (see <http://www.eri.com/testimonials>) and corporate proxies (<http://www.eri.com/ExecutiveCompensationProxyData>) and periodically appear in other authorized releases or public declarations. While ERI does not release listings of the names of its subscribers ERI has thousands of subscribers, including the majority of the Fortune 500 and several large government agencies. Subscribers include corporate compensation, relocation, and human resources specialists, plus other professionals, as well as independent consultants and counselors, and US and Canadian public sector administrators (including military, law enforcement, city/county, state/provincial, and federal government pay administrators).

A quick search of professional compensation forums will often return examples of uses of the **Geographic Assessor** in practice, like this anonymous posting:

"In the last 3 organizations where I have worked, we used data from national surveys and applied geographical differentials to the survey data to create our salary ranges. We considered the national survey data to be 100%. We would then use the geographical differentials([+] or-) from ERI and applied that to the survey data for each of the cities where we had offices."

Where do the numbers for salaries and wages come from?

Since its founding, ERI's methodology has been designed so as to be a premier provider of quality information and survey data. All salary survey sources for jobs have been carefully evaluated for validity, reliability, and use. Unreliable data sources and questionable data are identified and excluded from ERI's analysis. Many of ERI's **Assessor Series** applications (including the **Geographic Assessor**) look at trends over time and multiple sources, allowing for a more thorough validation process than could be established using a single source or at a single point in time.

ERI methodology has evolved over the decades in our pursuit of the highest quality standards in our expanded offering of products. During this time, ERI has won the patent for online interactive salary surveys and managed that patented survey for over a decade, built trusting relationships where we exchange data and products with other survey firms, and contracted for leased proprietary datasets. ERI has also developed its series of traditional salary surveys to become a leader in both online data collection and traditional salary survey methodologies.

Where do the numbers for cost of living come from?

ERI collects, compiles, and analyzes data relating to cost of living from available sources and researches areas which are not commonly surveyed individually. ERI compiles actual housing sales data from commercially available sources. Gasoline, consumables, medical care premium costs, and effective income tax rates are also just as accurately collected from authoritative online databases, and ERI research staff audit these sources with additional detailed study.

Why does the Geographic Assessor's Two City Comparison profile 'renter only' analyses?

Too many variables affect a home ownership analysis for ERI to make an appropriate set of assumptions for a cost-of-living comparison based solely on inputted earnings levels. However, the **Relocation Assessor** application and databases are designed to allow you to input the many additional variables (down payment and interest rate information, for example) that affect a home ownership comparison.

Why do the differentials change at different base salary values?

The **Geographic Assessor** analyses illustrate that salary differentials are not constant for an area. That is, a single number is not sufficient to describe the relationship between geography and pay across all salary levels. To account for this variation, the **Geographic Assessor** uses regression analyses to report the most accurate differential as salary level changes.

What is the difference between cost-of-living and geographic pay differentials?

A more complete differentiation can be found in Help under Assessor Series FAQ #3, but this question arises often enough that an abbreviated response should be included here. Put simply, wage and salary differentials reflect the local demand for and supply of labor, whereas cost of living is dictated by the local demand for and supply of goods and services. Because different factors affect the supply and demand of labor than affect the market basket of goods (the basis of cost of living), these two differentials will not, in most cases, be the same. Research has shown they often do move in the same direction, but not always. Take the case where there is a net increase in workers due to migration. The increase in labor supply could put downward pressure on the labor differential while putting upward pressure on housing costs, thereby increasing cost of living. Even when the differentials are in the same direction, the magnitudes can be very different. In urban centers, for example, both types of differentials are often higher; but, since workers can commute from areas with less expensive housing, the COL differentials tend to be much higher than the labor differentials in these cases.

Besides the underlying difference in the supply and demand, another reason why users focus on cost of labor differentials is that cost-of-labor differentials often more closely correspond to the labor market scope of the salary structure. In other words, COL can vary greatly from neighborhood to neighborhood within the same city, but companies would not restrict the recruitment labor market to a single neighborhood.

While employees may find it more desirable for their pay to be adjusted for local cost-of-living variances, this is an extremely unusual practice, and in many cases will not be cost effective for the employer. That is, in many cases, the employer would be competing against organizations with relatively lower compensation costs and, thus, be at a competitive disadvantage. Most compensation professionals agree that, when a company is hiring from the local work force (that is, when no transfer or relocation occurs), wages and salaries are set according to market pricing of wages and salaries only. In a recent informal polling of webinar attendees, most used salary differentials when adjusting salary structures, while a much smaller subset used both types in conjunction (perhaps where required). None used cost of living exclusively. While the cost-of-labor differentials are best utilized when adjusting pay structures (as the underlying data are congruent), in practice, there may be other contextual factors such as compensation philosophy or contractual requirements that need to be considered.

The program allows me to easily compute cross-country comparisons, but are such comparisons valid?

The cross-country comparisons are statistically valid; however, it is not advisable to take a pay system from, say, the United States and try to adjust it for a Canadian branch office using the general geographic differentials because U.S. and Canadian economies value jobs quite differently (as do most international economies). It is important to review pay by job and job description, rather than by general salary level. Cross-country comparisons, however, can give some general insight into labor cost differences where such information may be difficult to obtain otherwise.

Reliability Statistics - A Note for Expert Witnesses

In 1975, the US Congress passed Federal Rule of Evidence 702 so that a threshold standard for the admission of expert witness testimony might exist in federal courts. Based on the concept that experts should use methodologies that are "generally accepted" by a discipline's practitioners, the rule states: "If scientific, technical, or other specialized knowledge will assist the trier of fact to understand the evidence or to determine a fact in issue, a witness qualified as an expert by knowledge, skill, experience, training, or education, may testify thereto in the form of an opinion or otherwise." Following this, the Supreme Court issued an opinion in *Daubert v. Merrill-Dow Pharmaceuticals*, 509 U.S. 579, 113 S. Ct. 2786, 125 L.Ed.2d 469 (1993) that has become the standard for the admission of "general acceptance". In this Case (which standard is now adopted by federal and most state courts), the admittance of expert witness testimony and evidence required a two-step analysis: A) Evidence must be relevant, and B) Evidence must be reliable. The "relevance" is a subjective judgment, but simple logic may be applied (salary survey data for use in labor cost differentials, proxy compensation data for use in maximum reasonable compensation cases, etc.) For the latter, "reliability", the Supreme Court established four separate, non-exclusive tests: 1) it can be illustrated that the theory or technique can be tested, 2) the data has

been subjected to peer review and publication, 3) there is a known or potential rate of error, and (4) there is a level of general acceptance in that particular discipline's community.

ERi Statement as to the Relevance and Reliability of Data

Relevance is totally determinable by the circumstances and situation presented. **ERi** provides outsourced analyses and presentations of salary, executive compensation, benefit, and cost-of-living survey data. Reliability is described in a four part, non-exclusive summary to match the Daubert challenge:

Testable

To illustrate how the technique can be tested is straightforward. The technique and data sources are described in this methodology, and replicating the results is a matter of performing similar regressions through similar salary data. Using smaller data samples will likely give similar, albeit less robust and comprehensive, results.

Subject to Publication and Peer Review

Assessor Series application databases are published on a quarterly basis. Unique monthly Internet visits now exceed 500,000 to <http://www.erieri.com> and related sites, with approximately five million unique visitors each year. **ERi's** peers are its competitors, those firms that also provide data analyses to their clients. Unlike **ERi**, that solicits an annual subscription, most compensation and benefits consulting firms charge an hourly rate for their research services. Suffice it to say, all the major consulting firms have purchased subscriptions so that their consultants could utilize **ERi** analyses. **ERi** data are used by these firms when consulting with their clients.. **ERi** data and analyzes are under constant review and critique by its competitors. **ERi**, unlike these firms, provides no fee-for-service/time consulting.

Known or Potential Rate of Error

Each **Assessor Series** application database illustrates, via a "Reliability Statistics" link, the beginning of a statistical overview of **ERi** data. Statistics are reported as derived from just one survey source for all salary and compensation presentations (so that copyright restrictions are not violated). **ERi** accumulates many survey sources to compile its analyses. Hence the data illustrated may be, in **ERi's** estimate, considered to be the highest possible standard error that might exist with each analysis. **Assessor Series** application database results are, by logic, more robust than the standard error displayed and reported.

General Level of Acceptance within the Discipline's Community

ERi has thousands of subscribers, including the majority of the Fortune 500 and several large government agencies. Many of these organizations are entering their third decade of being subscribers. **ERi** exhibits at major tradeshow. **ERi** data are used as source data by major publications and job boards. WorldatWork, NASBA, and HRCI accept **ERi** Distance Learning Center courses for professional maintenance and recertification continuing education credit. Major US employers rely upon **ERi** data as cited in corporate proxy filings (see <http://www.erieri.com/ExecutiveCompensationProxyData>).

ERi Economic Research Institute is a licensed user of postal code and latitude and longitude data from the United States Postal Service (USPS). Canadian Postal Codes are adapted from Statistics Canada Postal Code^{0M} Conversion (2013) which is based on data licensed from Canada Post Corporation. Contains data adapted from Statistics Canada, National Household Survey, 2011. This does not constitute an endorsement by Statistics Canada of this product. Contains Ordnance Survey data © Crown copyright and database right 2017. Contains Royal Mail data © Royal Mail copyright and database right 2017. Contains National Statistics data © Crown copyright and database right 2017.

ERi Economic Research Institute

111 Academy Drive, Suite 270, Irvine, CA, 92617 USA

Telephone (800) 627-3697

Email info.eri@erieri.com

<http://www.erieri.com>

Assessor Series application and database access by license agreement only.

Copyright © 1989-2017 ERI Economic Research Institute, Inc.
Patent Nos. 6,862,596 and 7,647,322

Assessor Series FAQ 3

Frequently Asked Questions

QUESTION: What is the difference between cost-of-living and geographic pay differentials

Wage and salary differentials reflect the local demand for and supply of labor.

Cost of living is dictated by the local demand for and supply of goods and services.

ERI subscribers may also come across the term "buying power," which is the inverse of cost of living. Cost of living is the cost of purchasing goods and services, as determined by the demand and supply of goods, services, and property. For example, if the cost of living is 10% higher in an area, the buying power is approximately 10% less in that area.

This demand for and supply of goods and services are defined in terms of the data [ERI](#) surveys for [Assessor Series](#) cost-of-living databases. This data is downloaded from existing sources and includes: rental rates, housing prices, income taxes, property taxes, gasoline prices, medical costs/services, major retail grocery and drug store prices, etc. Cost-of-living differentials, as reported by [ERI](#), reflect cost models at different income levels (e.g., an auto of "x" value driven "x" miles/kilometers, home rental with no mortgage income tax deductions, home ownership with income tax mortgage deductions, etc.). Local wages and salaries do not indicate the local cost of living. Cost of living indicates the comparable local buying power for any given salary.

Most compensation professionals agree that when a company is hiring from the local work force (that is, when no transfer or relocation occurs), wages and salaries are set according to market pricing of wages and salaries only. In general, branch pay should be dictated by market pricing of wage/salary differentials only.

While employees may find it more desirable for their pay to be adjusted for local cost-of-living variances, this is an extremely unusual practice, and in many cases will not be cost effective for the employer. That is, in many cases the employer would be competing against organizations with relatively lower compensation costs and, thus, be at a competitive disadvantage.

In most cases, cost-of-living is considered only when an employee incurs new expenses due to an "internal" move from one branch office to another. In this situation, the new salary would be set according to the destination market (local wage and salary level). Then, any cost-of-living allowance would be awarded separately from salary and for a finite period of time.

It is undesirable to build a cost-of-living adjustment into salary, as the integrity of the current salary administration program will be compromised. For instance, the transfer of personnel into an office where locally hired employees would be earning lower salaries than the transferee's "cost-of-living adjusted salary" is an undesirable and avoidable situation. The transfer of personnel into an area where local competitors' employees would be earning higher salaries than the transferee's "cost-of-living adjusted salary" is an equally undesirable and avoidable situation. Better solutions would include the award of a one-time (lump sum)

moving bonus or a gradually decreasing three-year cost-of-living allowance, which is awarded separately from the new locally adjusted competitive salary. Each organization's unique situation (tax considerations, cash-flow, etc.) will dictate the best method for handling cost-of-living allowances.

A random telephone survey by ERI's Director found that only 2% of ERI subscribers pay "the same for all jobs nationally, but vary levels by the cost of living." All other surveyed subscribers stated that they ignore cost of living and concentrate on the demand and supply/ local market pricing to administer geographic pay differentials.

Cost of Living v Market Pay Rates

There are many reasons why employers decide to pay the local market pay rate (what it takes to attract, retain and motivate a competent worker) instead of paying according to local costs:

No two employees have the same living costs. Even if they hold the same job and earn the same money, their family circumstances and spending practices vary.

The cost of living depends on family lifestyle and the total budget available from all income earners in the family. Family expenses differ according to many variables, such as the number of income earners, the total budget available, size of home, whether renting or buying, how many dependents, number and value of automobiles, and more. Every cost-of-living statistical model uses a different standard market basket of goods and services.

It is quite difficult to come up with only one cost figure that properly fits every employee lifestyle, but it is quite simple to determine what other employers pay for the job you do.

Pay is usually set once a year according to local salary levels, corporate pay strategy, and budget, but costs change constantly. Prices go up and down all the time, and employees would be quite upset if their wages were cut because the price of bread dropped this week, for example.

Companies pay for you to do work, at a competitive rate, rather than give you amounts based on your expenses. Employers are not even legally allowed to question job applicants about their family circumstances, so they are not about to set pay according to your spending pattern.

People don't usually live where they work. Most employees live in a town where the costs fit their family budget and where the prices are lowest for their lifestyle. They work where their employer is located, and that usually is not within walking distance of home. Basing pay on home location and family expenses would require different pay scales for every worker and even different rates for the same job done by people in the same community, if, for example, one was a single renter and the other was a homeowner with five dependents.

Relevant living costs are already covered by pay surveys. If wages and salaries are influenced by living costs, then the competitive market pay surveys reflect those costs. If

you wish to research livings costs, see ERI's [Relocation Assessor](#), which calculates cost-of-living levels based on earnings level, family size, home size, and automobile usage. The application reports the cost-of-living differential between a base city and destination city to determine the amount an employee must earn in the new location to "remain whole" (not lose buying power).