



# **Air Quality Management Division – Audit Key Findings and Recommendations**

*Northern Nevada Public Health -  
District Board of Health*

Presented by ERG  
March 27, 2025



# Agenda

- **Purpose and Methods**
- **Snapshot of Key Findings**
  - General Operations and Business Practices
  - Permitting Program
  - Compliance Program
- **Conclusions**
- **Recommendations**
- **Questions?**

# AQMD Organization Audit Purpose

**Understand AQMD's strengths, weaknesses, and challenges related to:**

- Permit actions and compliance with federal, state, and local regulations and requirements.
- Compliance and enforcement actions, metrics, and policies.
- Transparency in operations and responsiveness to community needs, including environmental justice (EJ) opportunities and best practices.
- Overall operational efficiencies and business practices.

**Identify areas for improvement and opportunities to enhance AQMD's efficiency, effectiveness, and service delivery**

**Develop actionable recommendations to help AQMD improve both internally and externally in delivering its services**

# Methods

- **Steering Committee engagement**
- **Document review**
- **Interviews** (12 total: 10 internal staff, 2 external customers)
- **Desk review** on existing best practices related to EJ
- **Permit review** (14 permits)
- **Compliance review** (12 sites, last 5+ years of inspection and case data)

## Key Audit Questions:

- Is AQMD meeting and delivering on the community needs (e.g., public education, engagement, addressing concerns)?
- Is AQMD utilizing best business and operating practices?
- Is AQMD identifying and addressing areas for operational improvement?
- Are there changes to processes and procedures that could improve important outcomes of AQMD's work?

*Disclaimer: Some key findings were informed by information drawn from interviews. While ERG strives to present accurate information, ERG cannot always guarantee the accuracy of the information shared as it reflects the perceptions of interviewees.*

# AQMD Operations and Business Practices

## *Interview Perception*

Strengths	Challenges	Areas for Improvement
<ul style="list-style-type: none"><li>• Effective external communication.</li><li>• Effective internal team collaboration and culture.</li><li>• Efficient with limited resources.</li></ul>	<ul style="list-style-type: none"><li>• Staffing turnover and unclear roles.</li><li>• Lack of technological advances.</li><li>• Lack of community awareness and understanding.</li><li>• Misaligned regulations and penalties.</li><li>• Operational restrictions.</li></ul>	<ul style="list-style-type: none"><li>• Strengthen capacity and resources.</li><li>• Improve internal workflow, SOPs, and training identification.</li><li>• Increase transparency and outreach support.</li><li>• Implement consistent regulatory efforts.</li></ul>

# Community Opportunities and EJ Best Practices

## *Interview Perception and ERG Desk Review*

### General Community Opportunities

Increase Public Awareness and Outreach

Offer More Technical Assistance

Collaborate with the Health Equity Committee

### General EJ Best Practices

Identify and Clarify EJ Concerns

Incorporate EJ Principles in Decision-Making

Engage Early in Planning Process

Use Tools and Technology for Enhanced Monitoring

Expand Workshops and Educational Outreach

# Permitting Program

## *ERG Subject Matter Expert Perception*

Strengths	Challenges	Areas for Improvement
<ul style="list-style-type: none"><li>• Consistency throughout permitting process.</li><li>• Clear and accurate referencing of applicable federal requirements.</li><li>• Effective templates.</li></ul>	<ul style="list-style-type: none"><li>• Missed opportunities for emissions controls.</li><li>• Permit content issues.</li><li>• Inconsistent supporting documents.</li></ul>	<ul style="list-style-type: none"><li>• Be specific to the source.</li><li>• Further develop templates.</li><li>• Update permitting language.</li></ul>

# Compliance Program

## *ERG Subject Matter Expert Perception*

Strengths	Challenges	Areas for Improvement
<ul style="list-style-type: none"><li>• Consistent and professional inspections.</li><li>• Access to technology and training.</li></ul>	<ul style="list-style-type: none"><li>• Unclear enforcement criteria in SOPs.</li><li>• Unclear or incomplete permits are difficult to enforce.</li><li>• Penalties are not well defined and generally low.</li><li>• Compliance assistance resources are not collected together.</li><li>• Compliance data could be more transparent.</li></ul>	<ul style="list-style-type: none"><li>• Clarify enforcement criteria.</li><li>• Improve feedback to inspectors.</li><li>• Use inspections to verify the basis of air permits.</li><li>• Implement a more robust civil penalty policy.</li><li>• Enhance the visibility of compliance assistance resources.</li><li>• Increase compliance data transparency.</li></ul>



# Conclusions

Is AQMD meeting and delivering on the community needs (e.g., public education, engagement, addressing concerns)?

Is AQMD utilizing best business and operating practices?

Is AQMD identifying and addressing areas for operational improvement?

Are there changes to processes and procedures that could improve important outcomes of AQMD's work?

AQMD has made **positive strides** in all these areas given current capacity and resources. There are still key areas for improvement to continue making progress in these areas.



# Recommendations

## General Operations

- Clarify staff roles and expectations.
- Automate processes and tools.

## Community and EJ

- Enhance community outreach and technical assistance.
- Develop and implement tailored EJ best practices.

# Recommendations (cont.)

## Permitting Program

- When emissions occur inside of a building or enclosure, ensure permittee shows compliance with EPA's Method 204 (effectively capturing all emissions), or demonstrates capture efficiency
- Ensure that emissions limits and operational requirements couple with permit requirements that are enforceable as a practical matter.
- Limit the use of *AP-42* as an emissions estimation tool.
- Continue to upgrade newly issued and renewal permits with a TSD.
- Develop a procedure to ensure that sources will not cause or contribute to violations of the NAAQS.
- Improve existing guidance documents for applicants and permit writers, improve trainings, and create SOPs for the development of TSDs and permits.
- Coordinate with other agencies/departments.

# Recommendations (cont.)

## Compliance Program

- Enhance inspector health and safety training.
- Clarify enforcement criteria in procedures and training.
- Implement a more robust civil penalty policy.
- Enhance the visibility of compliance assistance resources.
- Increase compliance data transparency.

An aerial photograph of a city, likely Salt Lake City, Utah, showing a dense urban area with numerous buildings and a large industrial facility with many white storage tanks. In the background, there are large, rugged mountains with some snow on their peaks. The sky is clear and bright. A green horizontal bar is positioned above the text.

**Questions?**