

# Title V: Air Permits for Iowa's Largest Facilities

Created as part of the federal Clean Air Act Amendments in 1990, the Title V program ensures larger industries comply with air quality requirements—protecting health, safety and economic opportunities for Iowans. Air quality regulations placed upon industry through state and federal rule requirements are varied and can be quite complex. A Title V permit compiles these regulations for a facility into a single document. Part of this permitting process includes deciding if existing monitoring requirements are enough to ensure ongoing compliance with the appropriate requirements.

Once completed, a Title V permit helps the facility comply, and the DNR inspect and review compliance. Consistent compliance and comprehensive inspections lead to improved air quality.



*Clean air is vital for everyone. The Title V program is part of a comprehensive regulatory system that works on the local, state and federal levels to ensure healthy air quality for all.*

## OTHER BENEFITS INCLUDE:

- Ensure states have sufficient resources to administer the program by charging fees.
- Provide practical methods for determining compliance with requirements.
- Require regular reporting on the facility's compliance with emission limits and monitoring requirements.
- Opportunity for public participation.

## Facility Responsibilities

- Submit annual compliance certifications, stating compliance status of each requirement included in the Title V permit.
- Submit semi-annual monitoring reports
  - Report summarizes the monitoring requirements included in the Title V permit.
  - The report also includes all instances of deviations from permit requirements.
- Yearly emissions inventory
  - Facilities submit an inventory of the actual emissions of air pollutants from each emissions source at the facility in tons per year.
  - Annual fees are assessed on each facility based on total tons of pollution emitted.

## Monitoring

Under the Title V program, two levels of monitoring ensure proper operation and maintenance of pollution control units.

- Periodic Monitoring—Using Iowa DNR's *Periodic Monitoring Guidance*, the facility collects data demonstrating the emission unit's ongoing compliance with permit limits.
- Compliance Assurance Monitoring (CAM)—This is a federal requirement implemented through the Title V program.
  - CAM plans are required for the largest controlled emission units at a facility. These emission units would cause a greater impact on the surrounding area if the control equipment was not operating correctly.
  - Establishes "indicators" and minimum observation frequencies for the facility to monitor in order to assure compliance with the permit.

## Who Needs a Title V Permit?

Only the largest industrial facilities.

- Facilities with potential air emissions of greater than 100 tons per year of any of the following pollutants:
  - Particulate Matter less than 10 micrometers in diameter ( $PM_{10}$ )
  - Sulfur Dioxide ( $SO_2$ )
  - Nitrogen Oxides ( $NO_x$ )
  - Volatile Organic Compounds (VOC)
  - Carbon Monoxide (CO)
  - Lead
- Or, facilities that have the potential to emit Hazardous Air Pollutants (HAP) as follows
  - 10 tons per year for any single HAP
  - 25 tons per year of total HAPs from the source

## Title V Permitting Process

- Once a facility becomes subject to Title V, they have 12 months to submit a complete application to the permitting authority.
- Before a Title V permit can be issued, it must go through two review periods.
  - A 30-day public comment period where concerned citizens can review the draft permit and submit comments on the permit or request a public hearing.
  - A 45-day U.S. Environmental Protection Agency (EPA) review period where the EPA regional office can review the draft permit and submit comments.
- Within 60 days after the EPA review period closes, citizens can petition the EPA regional office requesting an objection to the permit.
- The DNR issues each permit for up to five years. Near the end of the permit term, the facility must apply for a complete renewal of the Title V permit, which will be reviewed by DNR.

While a Title V permit does not impose new emissions requirements on affected facilities, air quality is improved through a greater understanding of the requirements and compliance status of the largest industries in the state.

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