



Title V Operating Permit Application

**FORM EZ MOD: MINOR MODIFICATION TO EXISTING OPERATING PERMIT**

Use this form to apply for a minor modification to an existing Title V operating permit due to newly issued or modified construction permits.

Please see guidance and instructions for more information.

**FACILITY INFORMATION**

1. Company Name: \_\_\_\_\_

2. Facility Number: \_\_\_\_\_ 3. EIQ Number: \_\_\_\_\_

4. Permit Contact Name: \_\_\_\_\_ Title: \_\_\_\_\_

Phone Number: \_\_\_\_\_ Email: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

**CONSTRUCTION PERMIT APPLICATION INFORMATION**

5. Project Number: \_\_\_\_\_ 6. Application Submission Date: \_\_\_\_\_

7. Should all information in the construction application be incorporated by reference to the Title V application?  
 Yes  No

8. Exclusions:

Description	Form Number	EP Number

**CONSTRUCTION PERMIT INFORMATION**

9. Project Number: \_\_\_\_\_ 10. Permits Issuance Date: \_\_\_\_\_

11. Should all issued construction permits from this project be incorporated by reference to the Title V application?  Yes  No

12. Exclusions:


**EMISSION UNIT SPECIFIC INFORMATION**

13. Emission Point Number	14. Emission Unit Number	15. Emission Unit Description	16. SCC Number	17. Expected Start-Up Date

**COMPLIANCE STATUS (for existing units only)**

**18. Indicate the compliance status of all units affected by this application for the prior year:**

- In compliance with all applicable requirements.
- Not in compliance. (Stop here. Please use the standard Title V application forms.)

**19. Indicate the compliance status of all units affected by this application on the date submitted:**

- In compliance with all applicable requirements.
- Not in compliance. (Stop here. Please use the standard Title V application forms.)

**STATEMENTS OF CERTIFICATION BY RESPONSIBLE OFFICIAL<sup>1</sup>**

**Certification of Minor Modification**

I certify that the proposed modification meets the criteria for use of minor permit modification procedure (567 IAC 22.107(4)) and request that such procedure be used.

**Statement of Certification of Compliance**

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, that the statements and information contained in this document accurately reflect the compliance status of this facility for the prior year, and are true, accurate, and complete.

**Certification of Truth, Accuracy and Completeness**

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application (and the construction application and permits referenced by this application) are true, accurate, and complete.

\_\_\_\_\_  
**Signature of Responsible Official**

\_\_\_\_\_  
**Title of Responsible Official**

\_\_\_\_\_  
**Print Name of Responsible Official**

\_\_\_\_\_  
**Date signed**

<sup>1</sup> As required by 567 Iowa Administrative Code (IAC) 22.107(4), the responsible official must sign the statements of certification.

## Title V Operating Permit Application

# Guidance for Form TV EZ Mod: Minor Modification to Existing Operating Permit

### When to Use the EZ Mod Form:

The Title V EZ Mod Form is an optional alternative to the standard Title V application forms to request a minor Title V permit modification. To reduce submitting duplicate information, this form incorporates data elements from the construction permit application and final issued construction permits.

This form cannot be used in the following instances:

- **If there are non-compliance issues regarding the included equipment.**
- **If your facility is located in Linn or Polk County.**

In these cases, or if the modification is not a minor modification, use the standard Title V application forms [www.iowadnr.gov/InsideDNR/RegulatoryAir/OperatingPermits/FormsInstructions.aspx](http://www.iowadnr.gov/InsideDNR/RegulatoryAir/OperatingPermits/FormsInstructions.aspx)

### What Is A Minor Modification?

As required by 567 Iowa Administrative Code (IAC) 22.112(1), minor Title V permit modification procedures may be used only for those permit modifications that satisfy all of the following:

- a. Do not violate any applicable requirement;
- b. Do not involve significant changes to existing monitoring, reporting or record-keeping requirements in the Title V permit;
- c. Do not require or change a case-by-case determination of an emission limitation or other standard, or an increment analysis;
- d. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision of Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the Act;
- e. Are not modifications under any provision of Title I of the Act; and
- f. Are not required to be processed as a significant modification under rule 567 IAC 22.113.

### Examples of Minor Title V Permit Modifications:

Using the *Title V EZ Mod Form* would be appropriate for the minor Title V permit modifications below:

- A construction permit is modified to correct emission point characteristics (stack height, diameter, flow rate, etc.).
- A minor construction permit that has been modified to change applicable operational limits (throughput limits, Volatile Organic Compounds (VOC) content limitations, etc.) that do not affect the facility's Prevention of Significant Determination (PSD) status.
- A minor construction permit modification issued to change a facility-requested emission limit that does not affect the facility's PSD status or National Ambient Air Quality Standards (NAAQS) compliance status.
- A new construction permit modification issued to add a new emission unit to an existing emission point that does not affect the facility's PSD, New Source Performance Standards (NSPS), or National Emissions Standards for Hazardous Air Pollutants (NESHAP) status.
- A new construction permit issued to install a new emission point at a facility that is a minor source for PSD and that is not subject to federal NSPS or NESHAP standards.

This is not an exhaustive list of construction permitting actions that qualify as minor Title V permit modifications. Also, the DNR may request additional information to process the modification request. Or, the DNR may determine the requested changes do not meet the requirements of a minor Title V permit modification and require the applicant to submit a Title V modification application using the standard forms.

# Instructions for Form TV EZ Mod: Minor Modification to Existing Operating Permit

**Understanding TV EZ Mod Form Information: Each number provides an explanation for the corresponding field on the form.**

## Facility Information:

- 1. Company Name:** Enter the official company name and/or plant designation for the facility that is submitting the application. If your official company name has changed, please enter the new facility name.
- 2. Facility Number:** Enter the seven digit facility number. Find this number on the cover letter of a final construction permitting project.
- 3. EIQ Number:** Find this number on the cover page of the current Title V permit. Contact Weston Li at (515) 725-9580 if you have any questions regarding this number.
- 4. Permit Contact Name and Information:** List the name and contact information for the person most familiar with the plant operations, the person who should answer any questions regarding the permit application for this facility.

## Construction Permit Application Information:

- 5. Project Number:** Enter the construction permit project number for the construction permit application that should be considered for the Title V permit modification application. Find this project number in the cover letter for the final issued construction permitting project.
- 6. Application Submission Date:** Enter the date that the construction permit application submitted to DNR.
- 7. Should all information in the construction application be incorporated by reference to the Title V application?**  
In many cases, the information that was originally submitted as part of a construction permit application may change during the final permitting of the equipment. Common examples of information that may change during the permitting process may include: changes to the calculations of potential emissions, changes to stack characteristics (stack height, air flow rate, exhaust temperature, etc.), changes in process information (maximum capacity, hours of operation, raw material). To complete this section, review the construction permit application and final permits to determine if any of the information from the application changed.

If all information submitted with the original construction permit application is correct and contains all information used to issue the final construction permit, please check "Yes."

If the information contained in the final construction permits should be given precedence over what was submitted in the associated application, check "No."

- 8. Exclusions:** If you checked "No" in Line 7, provide a brief description of the information from the application that should be excluded in favor of the information contained in the final construction permits along with the construction permit form number and emission point number. If additional information is needed, attach more sheets to this form.

## Construction Permit Information:

- 9. Project Number:** Enter the construction permit project number for the construction permit application to be considered for the Title V permit modification application. Find this project number in the cover letter for the final issued construction permitting project.
- 10. Permit(s) Issuance Date:** Enter date the construction permit(s) to be considered as part of the Title V permit modification application was issued. Find this date on the first page of the final construction permit.
- 11. Should all issued construction permits from this project be incorporated by reference to the Title V application?**

If all final construction permits that make up the project should be considered for the Title V permit modification application, please check "Yes."

If only a portion of the construction permits issued with the project are to be included in the Title V permit modification application, check "No."

**12. Exclusions:** If you check "No" list the permit numbers which should be excluded.

**Emission Unit Specific Information (attach additional sheets as necessary):**

**13. Emission Point Number:** Enter the emission point numbers to be included in this Title V modification application.

**14. Emission Unit Number:** Enter the emission unit numbers to be included in this Title V modification application.

**15. Emission Unit Description:** Enter the emission unit descriptions to be included in this Title V modification application.

**16. SCC Number:** Enter the Source Classification Code Number (SCC) that identifies the type of process or activity occurring at the corresponding emission unit. For a list of valid point-source SCC numbers, please refer to the list at: [www.iowadnr.gov/InsideDNR/RegulatoryAir/EmissionsInventory/EmissionsEstimateTools.aspx](http://www.iowadnr.gov/InsideDNR/RegulatoryAir/EmissionsInventory/EmissionsEstimateTools.aspx).

**17. Expected Start-Up Date:** This is the date on which the equipment is expected to start operating. For new equipment, this would be the first time the equipment is to be put into production. For existing equipment with a physical change, this is the date the equipment was first operated in the new configuration. Do not complete this field for existing equipment where a physical change is not required.

**Compliance Status:**

Only complete this section when the Title V permit modification involves existing emission units.

**18. Indicate the compliance status of all units affected by this application for the previous twelve months.** If the applicable emission units were out of compliance during this time period, *do not use* Title V EZ Mod Form. Use the standard Title V application forms instead.

**19. Indicate the compliance status of the applicable emission units on the date submitted.** *Do not use* the Title V EZ Mod Form if the applicable emission units were considered out of compliance on this date. Apply for a modification using the standard Title V application forms.

**Statement of Certification:**

The Responsible Official (as defined in 567 IAC 22.100) must complete this section.

**Submittal Requirements:**

Submit one copy of completed form to the following addresses, prior to making the changes:

Iowa Department of Natural Resources  
Air Quality Bureau  
7900 Hickman Rd Ste 1  
Windsor Heights IA 50324

US Environmental Protection Agency Region 7  
Air Permits and Compliance Branch  
11201 Renner Blvd  
Lenexa KS 66219

If you have questions, please call the DNR's Air Quality Bureau at 515-725-9500.