

Construction Permit Survey - [November 21, 2012 - May 1, 2014]

The survey was being conducted to obtain feedback from applicants on their experiences with the permitting process that could be used to help reduce obstacles to issuing high quality permits in minimal time.

A link to the electronic survey was sent to applicants in the permit transmittal letter included with issuance of the construction permits for a project. Completion of the survey was voluntary.

Person completing this survey:		
Answer Options	Response Percent	Response Count
Consulting Engineer	15.6%	17
Project Manager for company or individual needing permit	68.8%	75
Contractor	1.8%	2
Other (please specify)	13.8%	15
<i>answered question</i>		109
<i>skipped question</i>		0

Type of organization needing permit:		
Answer Options	Response Percent	Response Count
Individual	2.8%	3
Business or Industry	95.4%	104
City or County	2.8%	3
Other (please specify)	0.0%	0
<i>answered question</i>		109
<i>skipped question</i>		0

What DNR resources did you use to help you complete your application? (check all that apply)		
Answer Options	Response Percent	Response Count
Air Quality technical assistance telephone helpline (1-877-247-4692)	17.1%	18
Direct telephone calls to engineer or DNR staff	69.5%	73
Air Quality pages on DNR website	61.0%	64
Frequently Asked Questions on Air Quality website pages	17.1%	18
Other (please specify)	17.1%	18
<i>answered question</i>		105
<i>skipped question</i>		4

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Number	Response Date	What DNR resources did you use to help you complete your application? Other (please specify)
1	Jan 31, 2014	most of info came from old permits
2	Dec 9, 2013	Contractor
3	Nov 20, 2013	Email consultation with permit engineer
4	Oct 29, 2013	The help line seems to always go to voice mail so if I have questions I try to call an engineer direct
5	Oct 18, 2013	3rd party environmental engineering firm
6	Oct 9, 2013	emails
7	Sep 24, 2013	Outside source
8	Aug 22, 2013	None
9	Aug 15, 2013	Consulting Engineer
10	Jun 18, 2013	Rules
11	Mar 6, 2013	outside independent consultant
12	Feb 19, 2013	Email and Phone calls for clarification
13	Feb 6, 2013	consultant
14	Jan 24, 2013	E-mail correspondence with DNR staff.
15	Jan 22, 2013	Used no DNR resources
16	Jan 3, 2013	None were needed for this permit application
17	Dec 14, 2012	none other than email discussions
18	Dec 14, 2012	None

Please rate the following statements describing resources available to help you understand the application process.						
Answer Options	Completely Disagree	Somewhat Disagree	Don't Know	Somewhat Agree	Completely Agree	Response Count
I was able to easily find air quality permit information on the DNR website.	1	4	14	39	46	104
The application forms on the DNR website are clear and understandable.	4	2	12	41	45	104
The technical assistance telephone line was helpful for answering questions about my application.	1	4	39	18	36	98
DNR staff returned my phone calls in a timely manner.	1	2	9	18	74	104
DNR staff was courteous and professional.	1	1	3	7	92	104
<i>answered question</i>						106
<i>skipped question</i>						3

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Please rate the following statements describing the construction permit application process:						
Answer Options	Completely Disagree	Somewhat Disagree	Don't Know	Somewhat Agree	Completely Agree	Response Count
The directions for how to complete the application were clear and understandable.	3	6	14	44	34	101
I was able to complete all the fields on the application forms with little or few difficulties.	4	5	8	45	36	98
If my application was returned for further information or if additional information was requested, directions on what was needed were clear and understandable.	1	4	8	23	60	96
I received my permit(s) from the DNR in a timely manner.	4	7	4	25	61	101
<i>answered question</i>						102
<i>skipped question</i>						7

Please provide additional comments regarding your answers to the previous questions, especially any special concerns or feedback:	
Answer Options	Response Count
	57
<i>answered question</i>	57
<i>skipped question</i>	52

Please provide additional comments regarding your answers to the previous questions, especially any special concerns or feedback:
Staff is very professional and courteous.
Played phone tag with Air Quality Section. Never actually got question answered.
Question. Draft and Final Permit nowhere does it state if a fee is or is NOT required.
Permitting process is very efficient in Iowa.
[Engineering staff] completed the permits in a timely manner. However, the permit was in queue for several weeks before it got picked up. I understand this is due to the number of permits already "in line", but that initial waiting period does result in taking a couple months to get a permit issued.
[Engineering staff] did a great job nice working with him.
[Engineering staff] is very professional and easy to work with. Great job performance!
The application sat for several months before being assigned. However, once assigned, the engineer was very professional and timely in developing the permits.
The Emission Unit paperwork for engines has a typo in it. The list of possible SI engines should be 4 Stroke Lean, 4 Stroke Rich, and 2 Stroke Lean

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Please provide additional comments regarding your answers to the previous questions, especially any special concerns or feedback:
I used a consultant so I could not answer the questions.
The DNR staff had specific information wanted in the modeling discussion that are not listed in guidance documents. Also, would be helpful to clarify more formally what credit can be taken for decommissioning equipment for comparison to the construction modeling lb/hr thresholds, both for sites with and without past modeling.
Project applications completed by contractor
The staff is quite helpful and they are always willing to assist me when I call or email. This is important to me because their assistance allows me to get the work done correctly the first time.
The permit group was very helpful during our permitting phase - including helping our company to obtain a construction variance.
Years ago I tried using SPARS with not much success and never used SPARS. Recently I changed employers and my new employer uses SPARS. With this recently submitted air construction permit we used SPARS and it has greatly improved but there are still some glitches with it. For instance when attaching documents the only place that will accept attachments is the FI form. Even then it is not certain that they will attach. We attached all our documents on the FI form then when the IDNR engineer was reviewing our application he said they were not there. The engineer was very professional and most helpful. We resolved the situation but there are still some issues with SPARS. From time to time there is also some accessing SPARS issues. If working properly, it could be an awesome tool.
Would be nice to have a call from the DNR when the material is submitted to know it arrived and at least the documents were there.
Very helpful in my goal of obtaining a crematory in Knoxville, Iowa
This survey was received prior to receipt of the hardcopy of the permits. Email confirmation of approved permits have been received.
The DNR staff did a good job assisting me. As a business owner I find the regulations cumbersome and hard to understand. The big picture makes sense. The problem is at the implementation level.
prompt courteous service as always
There is a lack of internal communication between the different departments in DNR. The inexperience of the staff hinders their ability to make a decision.
The turn around time from when the application and letter were submitted until receiving the permits was very good. This is very helpful in moving projects to completion. Nice job.
Permit was a simple natural gas boiler, but a draft permit was issued in a little over two weeks. Excellent service.
DNR staff are very courteous, knowledgeable and responsive. The bottleneck for my client's permit application was in the permit being logged-in which took more than 2 weeks. This was a fast-paced application process and that two weeks was important. But that being said, all staff that I worked with exhibited high levels of professionalism.
While directions were clear, I needed assistance from an educated engineer to complete all forms. They were straight forward and easy application to follow.
My experience was very positive. The process is complex and the DNR Staff whether via the hotline or direct calls did a great job of explaining what was needed. I especially want to commend [DNR staff] on her knowledge of the NESHAP rules and taking the effort to dig into the recent language changes in the Industrial Boiler MACT. By having more concrete facts available on the regulations which she provided assisted me in obtaining internal project approval and in the end saved at least 10 jobs and kept an electrical capacity resource available to our members.
2 months went by before assigned to engineer
[Engineering staff] WAS VERY KNOWLEDGEABLE AND HELPFUL FOR OUR PROJECT AND COMPLETED IT IN A VERY TIMELY MANNER.... THANKS
The permit engineer did a really nice job.
The CE forms for cyclones ask for the diameter of the cyclonic section. Instructions were not clear as to what part of the cyclone IDNR is needing the diameter for.

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<p>Please provide additional comments regarding your answers to the previous questions, especially any special concerns or feedback:</p>
<p>[Engineering staff] was a pleasure to work with. Very timely and no issues with permit. Thanks [Engineering staff]!</p>
<p>Our application was submitted on 12/21/2012. Our first communication (requesting additional information) from the DNR was on 1/7/2013. The completeness review was completed on 2/4/2013 but the application was not assigned to the permit engineer until 3/7/2013 (which seemed to be a long time). Once the application was picked up by the permit engineer (around 3/28/2013), the draft permit was issued quickly (on 4/1/2013).</p>
<p>The turnaround time to obtain permits is getting longer and longer, no doubt because of the number of personnel available to process permit applications. The help desk is taking longer to respond to questions than in the past.</p>
<p>Permit process took 60 days.</p>
<p>Requests for additional information was received more than once asking for different items each time. It is difficult for permit writers to write permits on process operations they know nothing about and information that has already been supplied to the agency multiple times should not be required to be submitted again with each application.</p>
<p>Helpline response was excellent and assisted considerably in navigating the permit application process. Able to provide the necessary information as the application is more general and the helpline assisted in specific questions. The engineer on the project was very timely on reviewing the project and response to questions was exceptional.</p>
<p>It was hard for me to answer the questions pertaining to the application since our Environmental Consultant did most all of the work. From my experience the IDNR website and process is very good.</p>
<p>I rarely am able to find model and serial number of equipment.</p>
<p>All staff members are always very helpful and quick to respond to any help I may need.</p>
<p>The permitting experience with IDNR is highly dependent on which engineer picks up the application. Sometimes the experience is good, sometimes not so good. Timeliness is a relative concept. I have permits still in process that are 8 months from date of application. Others submitted later have been issued. When it is made clear that the permit is needed quickly, IDNR often responds quickly. If the permit isn't a priority, it may languish. I as the preparer bear a portion of that lack of timeliness, sometimes I don't respond quickly either.</p>
<p>I felt the process and application was made very easy by the paper work and staff. Absolutely no complaints.</p>
<p>I feel that this process is extremely difficult to go through. There is very little information out there to help with this. We permitted for our company's feed mills and we ended up using an independent consultant because it was very hard to understand. Obviously there is no thought given to the feed industry.</p>
<p>I reached out to the agency with a question about how best to submit the permit because we had a unique situation (for us) and was quite please with both how professionally I was treated and with the response given.</p>
<p>I was able to work directly with [Engineering staff] for direction and help in obtaining the necessary determination before construction. [Engineering staff] was a lot of help, and I'll probably direct future questions/comments/concerns towards her.</p>
<p>It would be nice to get an email when the DNR receives the permit application and when they begin to review the application. Sometimes it seems like the application sits there for awhile before someone gets to it. Updates on where the application is in relationship to being review would be nice if it's not going to be reviewed right away.</p>
<p>It was very difficult to fill out application must have called [Engineering staff] from DNR 30 times surely it could be made more idiot proof .</p>
<p>This particular application took over 2 months, while there were a couple changes and requests I consider this too long. No status updates unless prompted</p>
<p>A consultant was hired to complete the application process. My answers above are for me personally and may not reflect the consultants opinions.</p>

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Please provide additional comments regarding your answers to the previous questions, especially any special concerns or feedback:

Response to minor permit amendments has been good and continues to be prompt and efficient. Generally prefer to have one permit writer, contact for most things - they get to know you and your permit history and helps to reduce confusion. In this case - it was assigned through mailed in application - and permit writer assigned was not usual one - but found to be efficient and prompt - although some errors in draft.

The IDNR Staff are always very helpful in providing information that I need and completing permits in a timely manner. The staff is always very professional and thorough.

Permit was processed promptly. IDNR engineer sought input in his proposed emission limits.

I did use the resource of an outside consultant however the process did go smoothly and the permitting process was as fast as any I can recall from the past.

Draft permit was received timely for review

Was very pleased with the permit engineer's assistance and patience.

I was very satisfied with the help from IDNR, we did have a problem but that was between us and our consulting firm, but IDNR staff helped us work through it

[Engineering staff], IDNR, was extremely helpful and a pleasure to work with.

I received great support directly from DNR Engineer - [Engineering staff]. Otherwise, the application process would of been much more complicated and time consuming to complete.

[Engineering staff] is great to work with.

Is there any way the DNR could improve its Air Quality construction permit process for your organization in the future?

Answer Options	Response Count
	44
<i>answered question</i>	44
<i>skipped question</i>	65

Is there any way the DNR could improve its Air Quality construction permit process for your organization in the future? Response Text

Our vendors (cat and cummins) both struggle to answer certain standard pollutant questions on IDNR forms. Something needs to be done to get this resolved. Takes too much time to get answers from vendors to IDNR.

Reduce the overall wait time between application submittal to the permit being issued.

Combine the construction and operating permit process. Issue one permit like many other states.

It would be helpful to clarify if there are any permit applications that do not require listing of all facility equipment, including small units, on the emission inventory forms.

No

Not really, they are easy to work with.

Not at this time.

Not in my opinion. I've worked with the air quality construction engineers for years and everyone of them have done everything possible to help me and ensure that I receive my air construction permit in a timely manner. Even when it was poor planning on either my companies or my fault.

No

Seems as if the process could be greatly simplified for Portable Crushing plants.

They were very helpful, thank you.

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No. I would like to compliment [Engineering staff]. He has been very helpful over the years. Thank you, [client].
The length of the process makes in hard to respond to business opportunities. A temporary or provisional permit would be helpful for simple/small applications.
Gain maturity and experience within the field staff.
None that I can think of.
Make the minor source modeling checks speedier.
Log-in applications more quickly. Perhaps establish an on-line process of checking on permit status updates to minimize the need to bother staff with these type of questions.
Not really. This was my 1st experience with an Air Quality Permit so information was really new to me. The polite staff were awesome in not making me feel too uneducated. :)
A minor point, but I don't know why you don't just include stack test protocol questionnaires with the permits. It would save me from having to remember to request them by the deadline, and save DNR the need to respond to these requests. We all know stack tests will be required, so why not incorporate them?
Maintain the local knowledge of the regulations as it proves valuable to industry that we can call or meet in person with people in our state to decipher these complex rules.
timely assign projects
Be more timely and open on assigning the permit engineer.
None that I can think of right now.
Perhaps shorten the length of time between the date the application is deemed complete and the date the application is picked up by the permit engineer who drafts the construction permit. In this case, it was approximately six weeks.
Provide more basic training sessions for newcomers so they can learn correct procedures to submit permit applications.
The construction permit process and forms for Title V facilities should be the same as those for a Title V application. It shouldn't matter what throughputs each unit has, but what the overall emissions from each emission point is.
There was concern of the duration of time before the application was picked up by a review engineer. A month had passed before the project was assigned. Not sure of a solution to this but until a the permit application is reviewed the submitter does not know if something was missed in the application.
Nothing comes to mind. It is a very good process. The team is excellent to work with and very helpful.
Nothing that I can think of. IDNR staff are very professional.
No,
We would like to see a permit engineer assigned to a company or facility. We experience significant variability in permits depending upon which permit engineer wrote the permit.
Too complicated to tell.
Perhaps hold an air permitting workshop specifically focused on filling out the permit application forms.
Employ staff that understands the feed industry. Make the permitting process understandable and use language that normal people can understand.
It would be helpful if the DNR could or would project a permit issuance timeframe upon receipt but I also can understand the challenges with doing this.
Having the ability to call the help line and/or a DNR agent directly really makes the process user-friendly. It is invaluable to have a real person (with real experience) aide in any questions that arise throughout the permitting process.
It would be nice to be able to tell clients how long it may take to get their application approved. When the monthly DNR newsletter is sent out, could you put how many reports are being reviewed in different areas and an estimated time for approval. Sometimes it can take a couple of months for the application to be reviewed and it would be helpful for us to know what kind of time frame we are looking at.
Standardization, expectations seem to change depending on the permit engineer.

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Proof read entire contents of permit to ensure that sections that were not requested for change - once change is made - still apply. in our case - we changed something in section 14, as requested - but draft permit maintained language in other sections of 14 and 15 that were then in conflict with the change - so had to do several rounds of revision. Likely could have avoided that if IDNR staff had re-read all permit terms prior to sending draft and caught those conflicts.

No, I've always been very satisfied with training and information provided.

Suggest increasing the draft permit review time to 5 business days, especially near holidays, and/or copying multiple individuals to ensure the draft permits can be reviewed in the allotted time frame if the primary contact is out of the office.

No

Make the minor source modeling process more transparent and easier for business to understand.

By assigning, a DNR Engineer to facilitate the process... We should be okay!