



# IOWA DEPARTMENT OF NATURAL RESOURCES

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LEADING IOWANS IN CARING FOR OUR NATURAL RESOURCES

## Iowa Title V Operating Permits

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# Presentation Outline

- Iowa DNR Title V Services
- Title V Program Basics
- Permitting Statistics
- Title V Process Improvements



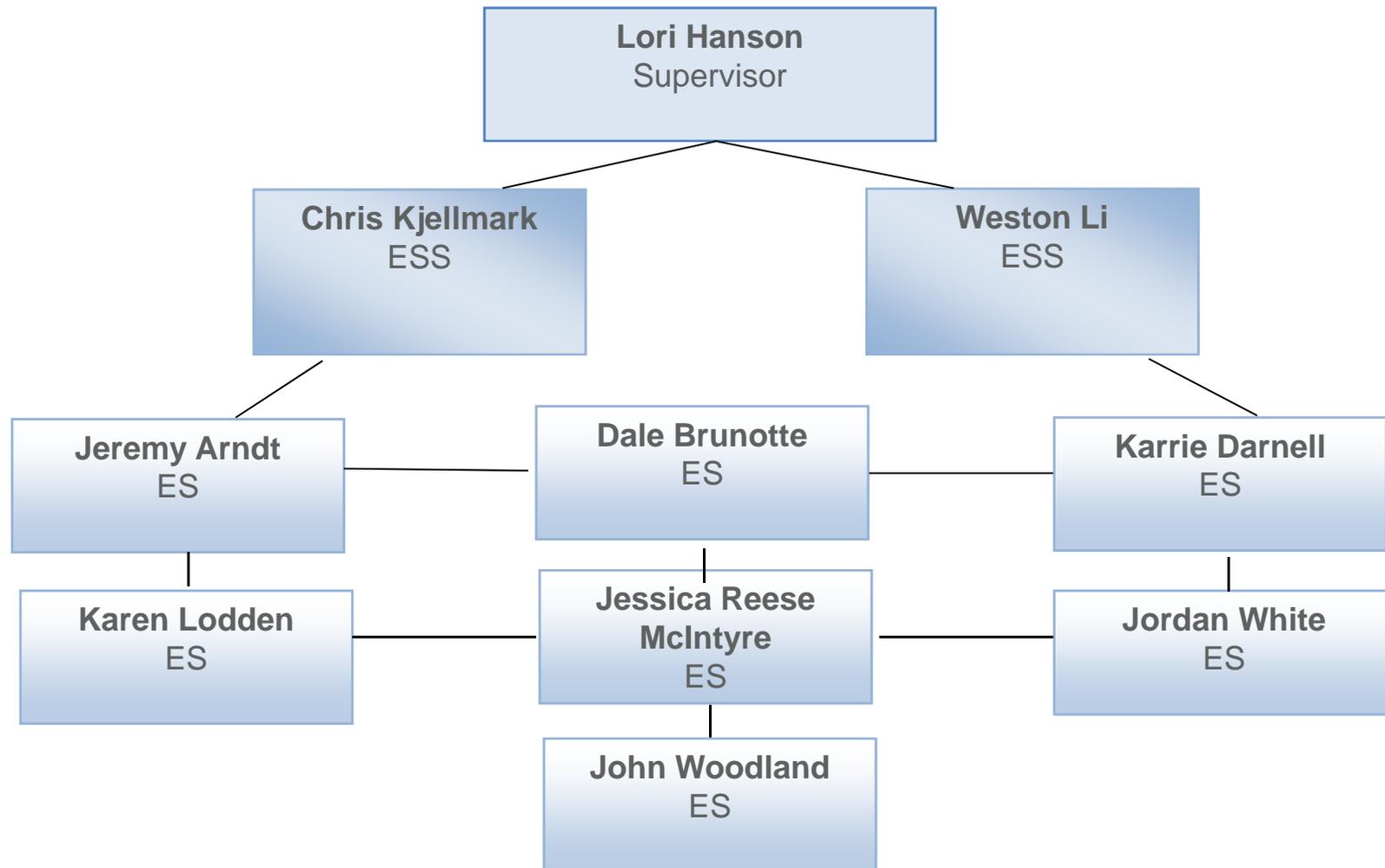
# Iowa DNR Title V Services

## Title V Permits Benefit:

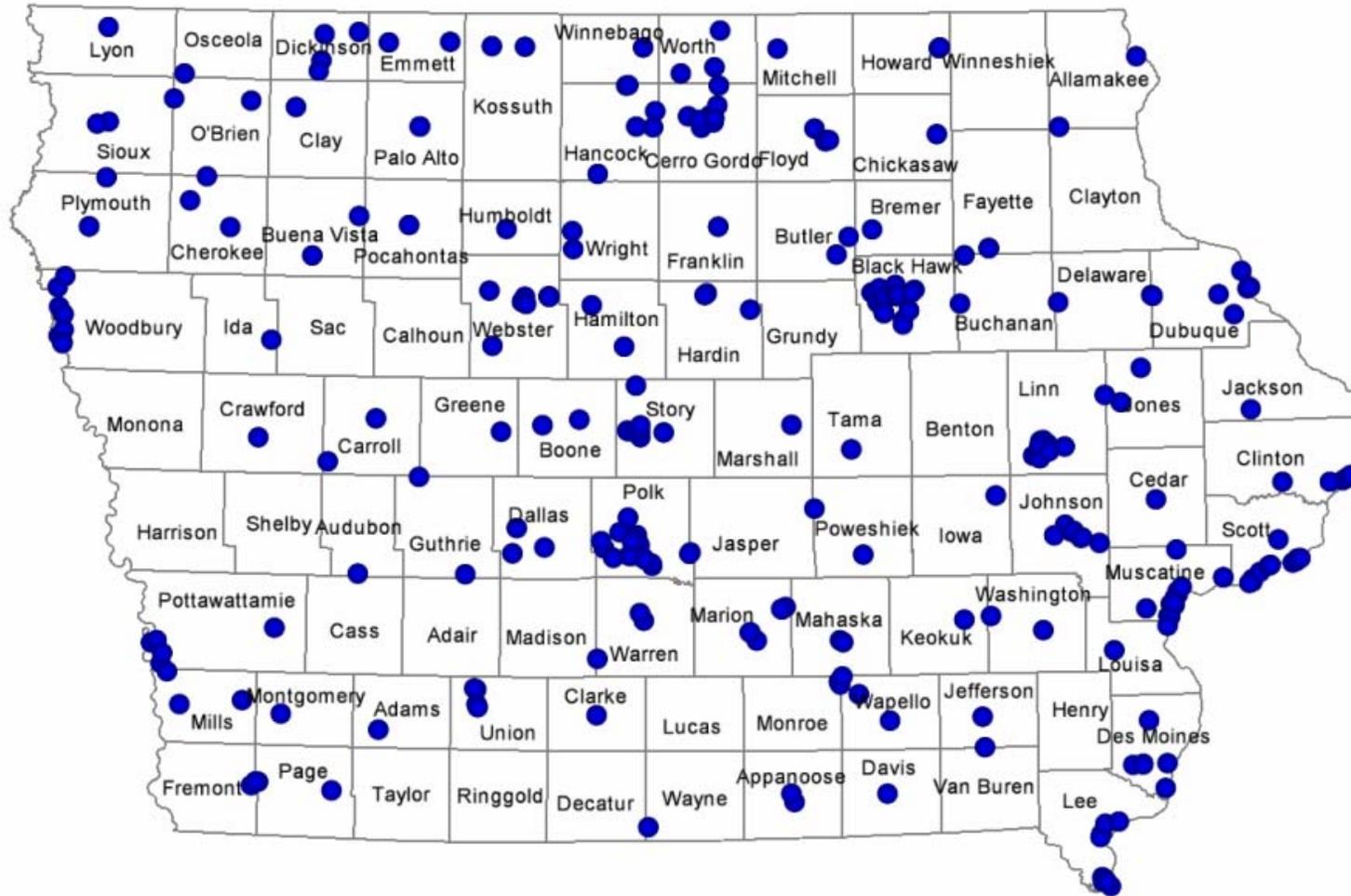


- Industry
  - Provides a concrete consolidated resource of all requirements for environmental managers to utilize
  - Identifies new requirements not previously recognized
  - “Locally” negotiated permit terms in Iowa vs. Kansas City
- Public
  - Emissions monitoring requirements lead to better air quality
  - One document describes all air quality requirements
  - Provides opportunities for active participation in the process
- State
  - Uniform and efficient mechanism to consolidate and administer the requirements of CAA

# Title V Organization Chart



# Iowa Title V Facilities



# Iowa Title V Statistics

	5-yr Average (2009 – 2013)	2013
Number of facilities	279	286
Total tons of pollution	297,238	260,809
Tons subject to fees	161,362	147,914
Fee per ton	\$56	\$56
Title V Fees paid	\$9.0 million	\$8.3 million
Percent of air program funded	77%	75%

# Title V Program Basics

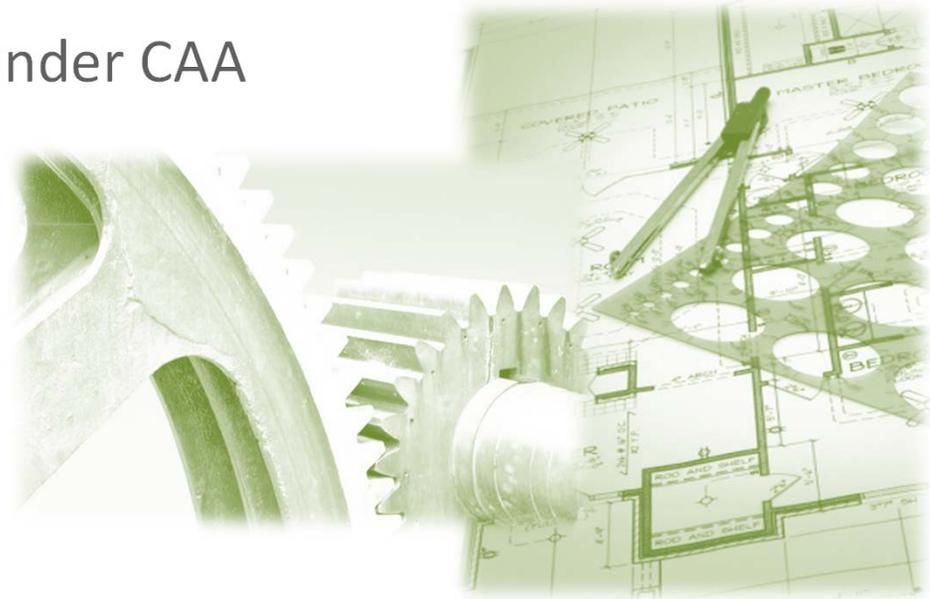
# The Title V Program

- Primarily affects the largest industries (major sources) with potential emissions of **any** of the following:
  - 100 tpy any regulated pollutant
  - 10 tpy any single hazardous air pollutant (HAP)
  - 25 tpy combination of HAPs



# The Title V Program

- Select smaller industries referred to as “area sources” are subject to Title V due to:
  - New Source Performance Standards (NSPS)
  - National Emissions Standards for Hazardous Air Pollutants (NESHAP)
- Solid waste incinerators under CAA section 129



# The Title V Program

- Incorporates ALL air requirements into a single document:
  - Federal regulations
  - State regulations
  - Pre-construction permits
  - Judicial and Administrative Orders
- Adds monitoring requirements to ensure continued compliance and protect public health



# The Title V Program

- Enforceable requirements:
  - Consolidates into a single document
  - Facilities file semi-annual monitoring reports
  - Certify their compliance annually
  - Submit annual emissions inventory
- Permits renewed every 5-years
- Pay annual fee on emissions
  - Fees are based on actual tons of pollution emitted
  - Based on annual emissions inventories



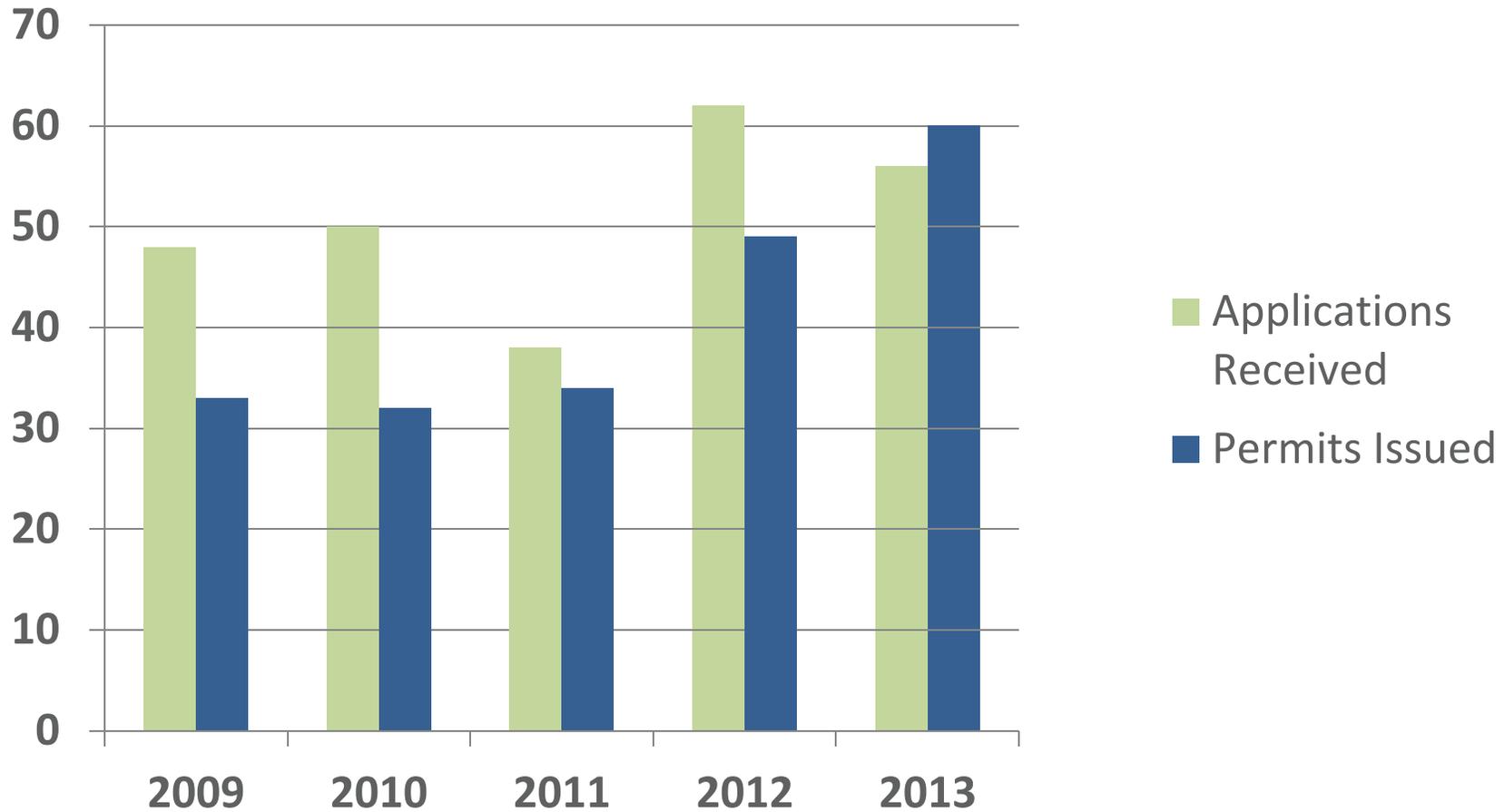
# The Title V Program

- Public review – provision for citizen involvement:
  - 30 days public notice
  - 45 days for EPA to object
  - +60 days citizens can petition EPA to object
  - +60 days for EPA to grant or deny permit

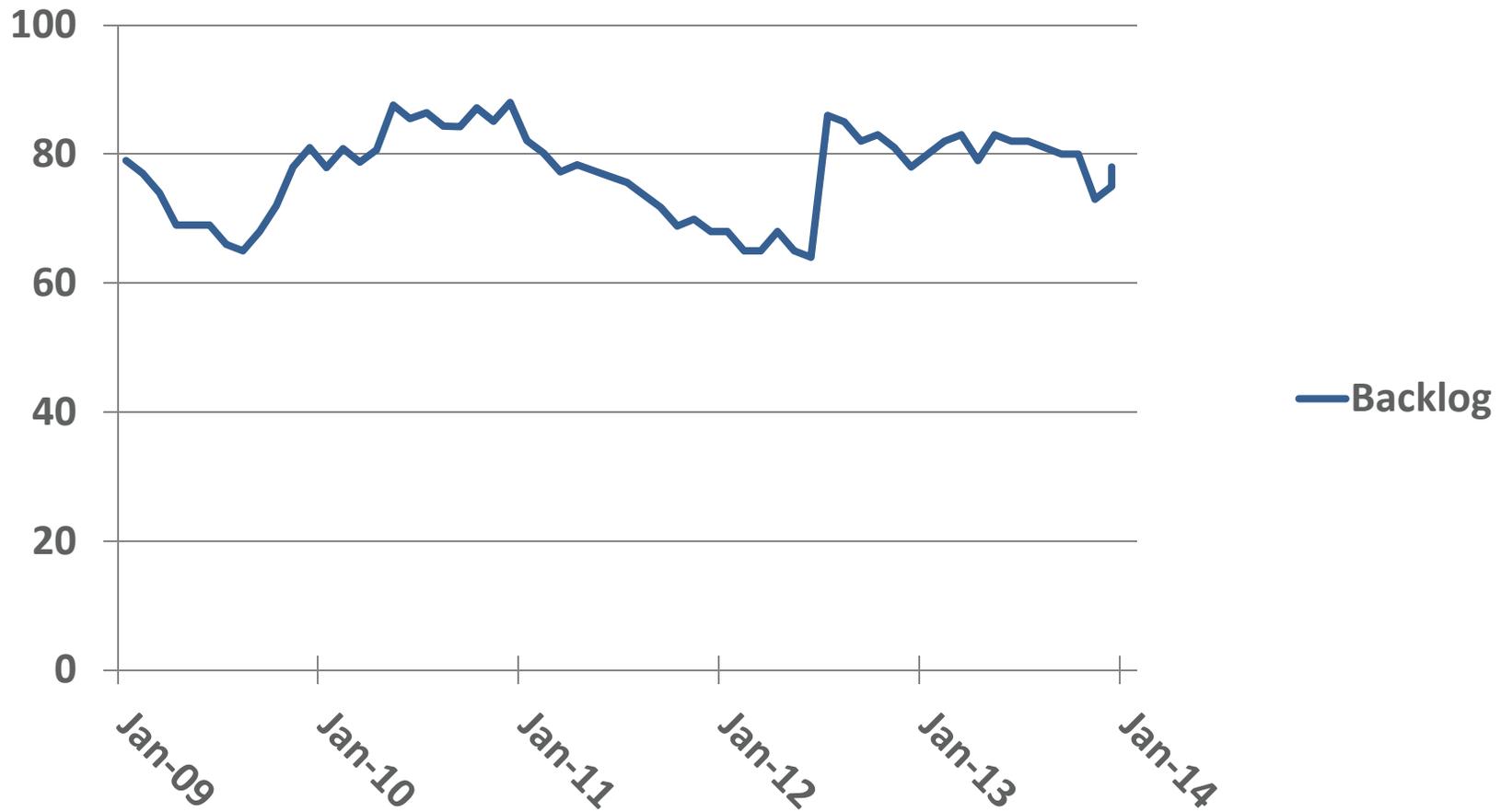


# Permitting Statistics

# Title V Application and Permitting History 2009 - 2013



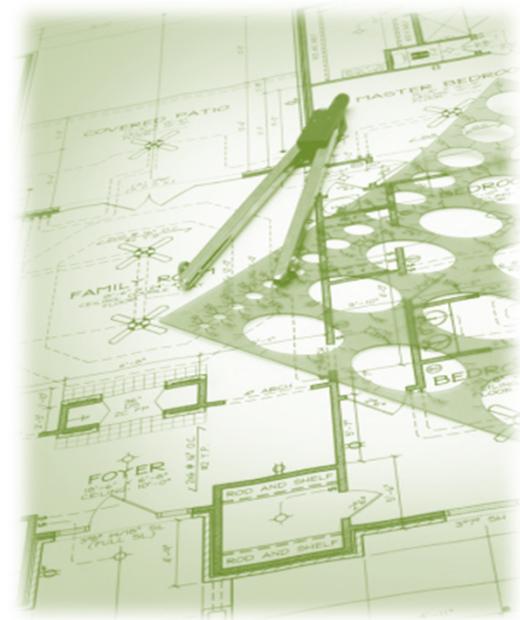
# Title V Permit Backlog



# Title V Process Improvements

# Title V Improved Efficiency

- 2012 Kaizen process improvement event:
  - Develop new Part 1 application - spreadsheet format
    - Not pursued due to limitations of the event
  - Created new Part 2 application
  - More informative instructions
  - Provide training/workshop
  - Increase intra-bureau coordination



# Title V Improved Efficiency



- 2012 Value Stream Mapping event:
  - Reviewed all Bureau activities and the value they bring to our mission, our customers and the public
    - Prioritize/eliminate/keep
  - Increased bureau-wide focus on Title V backlog
  - 76% increase in permit issuance between 2011 and 2013



# Title V Improved Efficiency

- Future streamlining 2014:
  - Initiative to help facilities exit Title V
    - 44 facilities with emissions < 25% TV thresholds
      - 6 may be eligible to exit
    - Additional 30 facilities < 50% TV thresholds
      - Additional 13 may be eligible to exit
  - Remove Voluntary Operating Permit rules
  - Allows DNR to focus on largest facilities



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# Questions?