Iowa Title V Operating Permits

Lori Hanson, Title V Operating Permit Section Supervisor
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

- Lori Hanson
  Supervisor

- Chris Kjellmark
  ESS

- Weston Li
  ESS

- Jeremy Arndt
  ES

- Karen Lodden
  ES

- Dale Brunotte
  ES

- Jessica Reese
  McIntyre
  ES

- Karrie Darnell
  ES

- Jordan White
  ES

- John Woodland
  ES
Iowa Title V Facilities
### Iowa Title V Statistics

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

Applications Received
Permits Issued

2009 2010 2011 2012 2013
Title V Permit Backlog

- Backlog

- Jan-09
- Jan-10
- Jan-11
- Jan-12
- Jan-13
- Jan-14
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
Lori Hanson
Title V Operating Permit Supervisor

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Questions?