



# IOWA DEPARTMENT OF NATURAL RESOURCES

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LEADING IOWANS IN CARING FOR OUR NATURAL RESOURCES

## Title V – Increasing Efficiency

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# Presentation Outline



- Streamlining the Application Process
- Assisting Facilities to Exit Title V Program

# Streamlining the Application Process

# Efficiency - Streamlining the Application Process

- 2012 Kaizen Process Improvement Event
  - Collaborative effort with 9 stakeholders
  - Several improvements
    - Increased bureau-wide coordination
    - More informative instructions
    - Provide training / workshop
  - New Part 2 application forms (general facility requirements and emission point information)



## Efficiency - Streamlining the Application Process

- New Part 2 Application forms
  - **Flexible** submittal of information
  - **Easier** for industry to use
  - Number of forms **reduced** from 20 to 6
  - Result in **faster**, more **seamless** permitting process
- Compliance Assurance Monitoring (CAM) spreadsheet
- Additional information requested (boilers & process heaters, engines, NESHAPS)



## Efficiency - Streamlining the Application Process

- New Title V forms completed in February 2014
- Applicants use new forms starting in August 2014
- Increased efficiency starting early in 2016
  - Copy & paste from application
  - More accurate applications
  - Fewer requests for additional information
- We welcome feedback!



# Assisting Facilities to Exit the Title V Program

## Efficiency – Assisting Facilities to Exit Title V

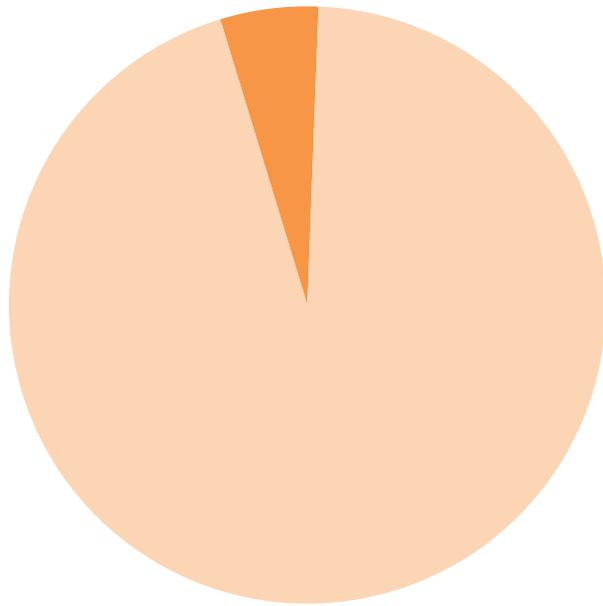
### Goals:

- Minimizes regulatory burden on industry
  - Permits do not need to be renewed every 5 years
  - No Title V fees
- Allows DNR to focus on assisting largest facilities
- Provide better services without compromising air quality

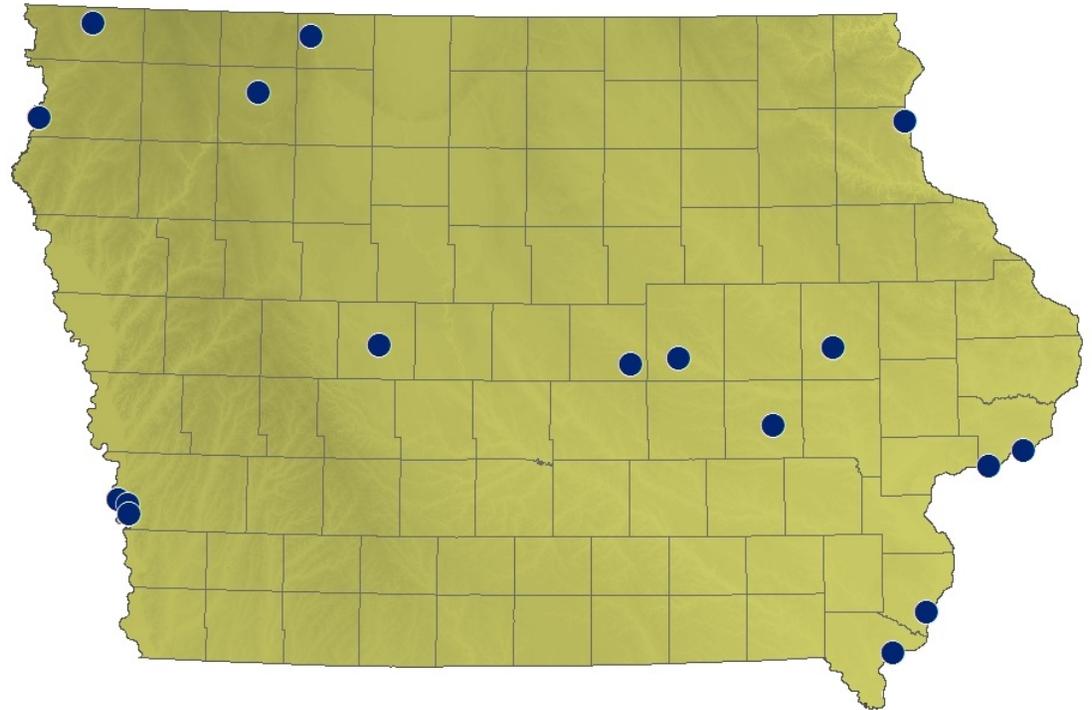


# Efficiency – Assisting Facilities to Exit Title V

17 VOP facilities transitioned out of Title V



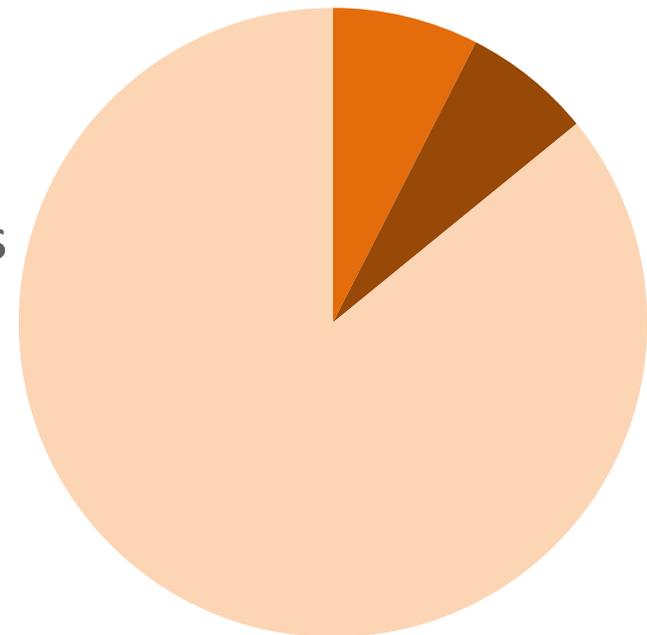
■ VOP Facilities ■ Total



## Efficiency – Assisting Facilities to Exit Title V

New initiative to help facilities with relatively low emissions to exit Title V

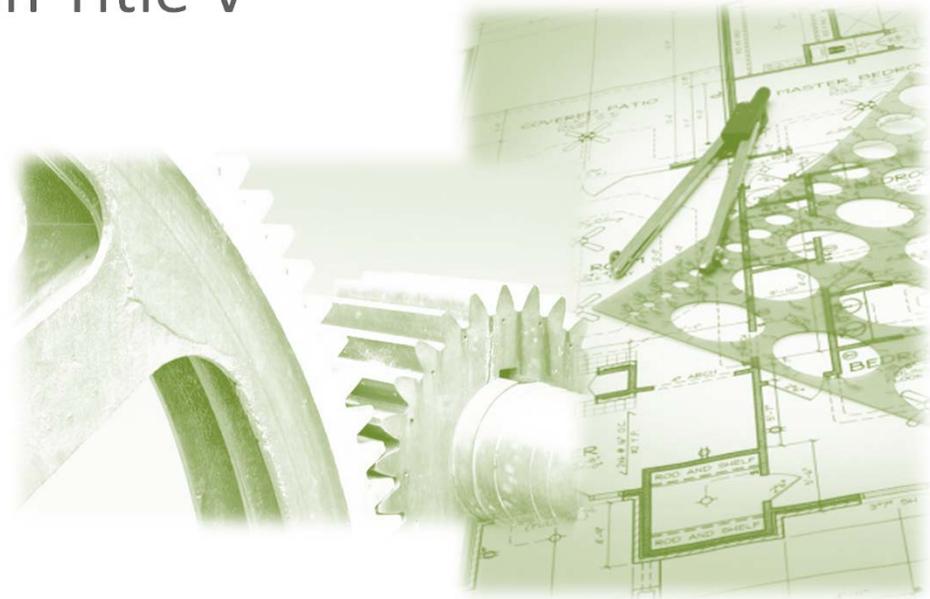
- Eligible facilities identified by the DNR based on actual emissions
  - 25 facilities < 25% TV thresholds
  - 22 additional < 50% TV thresholds
  - 16 of these may be eligible



■ < 25 % TV Thresholds   ■ < 50% TV Thresholds   ■ Total

## Efficiency – Assisting Facilities to Exit Title V

- Some facilities may chose to stay in Title V due to business plans
- Some facilities not eligible due to federal regulatory requirements to stay in Title V



## Efficiency – Assisting Facilities to Exit Title V

Process for initiative:

- 2 facilities selected as pilot projects
- Establish construction permit limits to ensure potential emissions are below Title V thresholds
- Rescind Title V permit
- Protocol developed from pilot projects
- Eligible facilities will be notified to gauge interest in participation

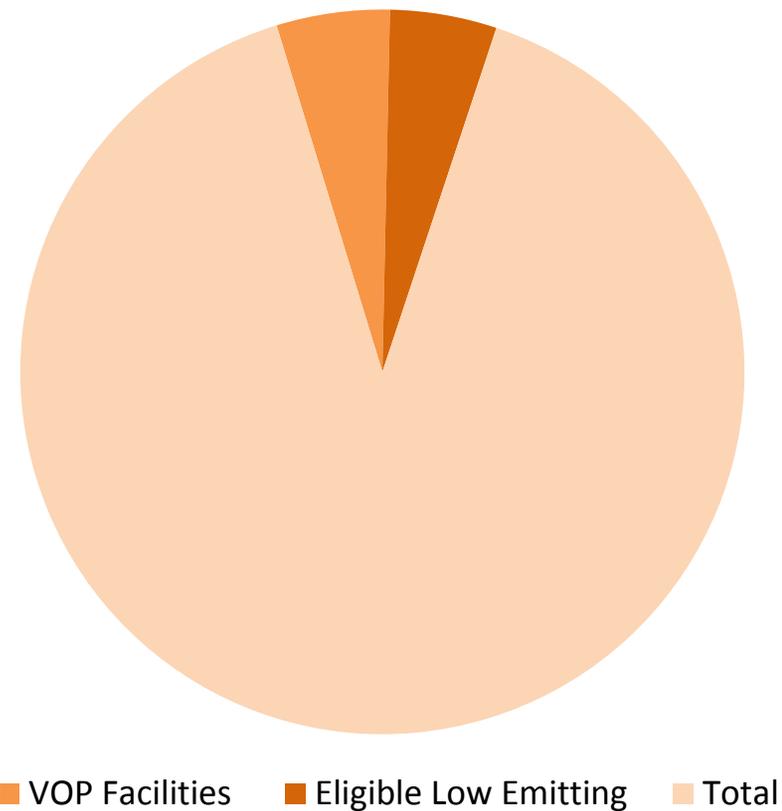
## Efficiency – Assisting Facilities to Exit Title V

- Timing of initiative
  - Currently working with pilot facilities
  - Contact other eligible facilities by December 2014
- Challenges
  - Requires staff resources
  - Especially, technical assistance from Construction Permit staff



## Efficiency – Assisting Facilities to Exit Title V

- Summary:
  - 17 VOP facilities transitioned out of Title V
  - 16 Facilities estimated to be eligible to exit Title V due to low emitting facility initiative
- Looking for additional incremental improvements through collaboration with partners



# Questions?

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