Client Contact Meeting
November 19, 2020

Sarah Piziali, Supervisor
Iowa DNR Air Quality Construction Permits
## EPA Guidance and Rulemaking

- Significant guidance/rulemaking for NSR program

<table>
<thead>
<tr>
<th>Rule or Guidance</th>
<th>Date</th>
<th>DNR Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reclassification of Major Sources as Area Sources Under Section 112 of the Clean Air Act (FINAL)</td>
<td>Signed 10/1/2020</td>
<td>Reviewing changes from draft rule</td>
</tr>
<tr>
<td>Project Emissions Accounting Rulemaking (Final)</td>
<td>Signed 10/22/2020</td>
<td>Reviewing changes from draft rule</td>
</tr>
<tr>
<td>PALs Guidance (FINAL)</td>
<td>8/5/2020</td>
<td>Implementing</td>
</tr>
<tr>
<td>EPA Guidance; Administrative Procedures for Issuance and Public Petitions (FINAL)</td>
<td>Published 10/19/2020</td>
<td>Implementing</td>
</tr>
</tbody>
</table>
EPA Guidance and Rulemaking

- Significant guidance/rulemaking for NSR program

<table>
<thead>
<tr>
<th>Rule or Guidance</th>
<th>Date</th>
<th>DNR Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>NSR Error Corrections Rulemaking (DRAFT)</td>
<td>11/26/2019</td>
<td>Waiting for final rule - expected Fall 2020</td>
</tr>
<tr>
<td>Construction Allowed Prior to Permit Issuance Guidance (DRAFT)</td>
<td>3/25/2020</td>
<td>Waiting for final guidance - expected Fall 2020</td>
</tr>
</tbody>
</table>
ABI and Industry Permitting Feedback

• Industry representatives provided feedback to Director Lyon in Fall 2019 and Spring 2020.

• Focused on five key areas:
  – Consistency
  – Communication
  – Customer Focus
  – Lead Times
  – Unneeded Data
Communication Plan

• Focus on:

  Communication and Lead Times

  – Creating CP dashboard on website
  – More emphasize on pre-application discussions
  – EASY auto email that application is received to RO
Communication Plan

- Focus on:
  Consistency, Communication, Lead Times and Customer Focus
  - Consistent engineer (when possible)
  - Add engineer to EASY project dashboard
  - Welcome email to permit contact
  - Project kick-off meeting

Completeness Review
Communication Plan

• Focus on:
  Consistency, Communication, Lead Times, Customer Focus, and Unneeded Data
  – Discuss permit requirements
  – Use consistent terminology
  – Reset lead time expectations, if needed
Communication Plan

• Focus on:

  Consistency, Communication, Lead Times, and Customer Focus
  – Standardized information request email
  – Company check-in near due date
Communication Plan

• Focus on:
  Communication, Lead Times, Customer Focus, and Unneeded Data

  – Provide explanation of requirements (stack testing, recordkeeping, or emission limits) with draft permit if unexpected
  – Company check-in ~3 days after receive draft permit
Communication Plan

- Focus on:
  Communication, Lead Times, Customer Focus, and Unneeded Data
  - EASY auto email that permit is issued to RO
  - Communication survey
Communication Plan

• Started Implementation November 1\textsuperscript{st}

• Still Working On:
  – CP dashboard on website
  – Adding engineer to EASY project dashboard
  – Communication Survey
Sarah Piziali
email: sarah.piziali@dnr.iowa.gov
phone: 515.725.9549