



AIR QUALITY CONSTRUCTION PERMITS

OTHER DNR ENVIRONMENTAL SERVICES DIVISION PERMITTING PROGRAMS

In an effort to evaluate the existing air pre-construction permitting program administered by the Iowa Department of Natural Resources (DNR), the Construction Permits Section of the Air Quality Bureau conducted a survey of other permitting program areas within the Environmental Services Division (ESD). The results of this survey are summarized below.

PERMITTING PROGRAMS

The Air Quality Bureau is not alone within ESD when it comes to issuing permits. Both the Land Quality Bureau and Water Quality Bureau have sections that issue some form of permit or certificate. The following sections were contacted and surveyed regarding their permitting programs:

Land Quality Bureau

- Cathode Ray Tube (CRT) Device Collection and Recycling
• Appliance Demanufacturing Permitting (ADP)
• Municipal and Industrial Solid Waste Landfills
• Solid Waste Transfer Stations

Water Quality Bureau

- Flood Plains/Dam Safety
• Stormwater
• National Pollutant Discharge Elimination System (NPDES)
• Wastewater Engineering
• Water Allocation
• Water Supply Engineering
• Water Supply Operations
• Wetlands (401/404)

PROGRAM SETUP

Each of these programs is set up differently for permitting purposes. Not all of these programs issue construction permits. Some issue operational permits or certificates. Many of these permits or certificates are required to be renewed periodically. Table 1 provides a summary of the above programs permitting processes.

TABLE 1 – SUMMARY OF PERMITTING PROCESS

Table with 3 columns: Program, Initial Permit, and Modification. Rows include CRT Device Collection and Recycling, ADP, and Municipal and Industrial Solid Waste Landfills.

Program	Initial Permit	Modification
Solid Waste Transfer Stations	One permit per facility.	Permit amendment letters are issued.
Flood Plains/Dam Safety	One permit for each type of project (e.g. bridges, stream bank stabilization, levees, buildings, dams, etc.)	The previous permit is updated and reissued.
Stormwater	One permit for facility listing each discharge point.	Issuing an amendment addressing only conditions that are changed from original permit.
NPDES	Two types issued: -Individual: one permit is issued per application. - General: one general permit for each Notice of Intent submitted. Permittees may seek coverage under more than one general permit, and coverage may be required under a general permit in addition to an individual NPDES permit.	Individual: In the majority of cases, specific permit pages are modified and sent to the permittee as replacement pages. General: these permits are not modified. Company may submit another Notice of Intent.
Wastewater Engineering	Generally one permit per application. However have started issuing multiple permits per project.	Either modify the permit or issue a Supplemental Construction Permit letter, which can add items to the originally issued permit.
Water Allocation	Generally one permit per application.	A new permit is issued.
Water Supply Engineering	Generally one permit per application.	Made through an addendum or change order to previous issued permit.
Water Supply Operations	One permit for the entire facility with subparts for source water, water treatment and water distribution.	These are operating permits and are renewed every 3 years. Revisions can be made and are done by reissuing the entire previous permit. Renewals and revisions can be done at same time.
Wetlands (401/404)	One permit/certificate for each project.	Either reissue the entire 401 certificate or modification with a letter.

PERMIT LENGTH

As a part of the survey, the Iowa DNR asked the other permitting sections in ESD about the average length of their typical permits. One of the factors that impact the permit length is how much of the facility the permit

covers and how any applicable federal standards are incorporated into the issue permit. Table 2 shows the results of the survey.

TABLE 2 – SUMMARY OF PERMIT LENGTH

State	What Does Permit Cover?	Federal Rule Incorporation	Permit Length
CRT Device Collection and Recycling	Activity	Both by referencing and reprinting the rule.	4 pages
ADP	Activity	Both by referencing and reprinting the rule.	2 pages
Municipal and Industrial Solid Waste Landfills	Facility	Construction permits do not incorporate the federal rules as they are in the operating permit which must be active prior to issuing a construction permit amendment.	1 page
Solid Waste Transfer Stations	Facility	Construction permits do not incorporate the federal rules as they are in the operating permit which must be active prior to issuing a construction permit amendment.	1 page
Flood Plains/Dam Safety	Activity	Does not have to incorporate federal rules as state rules are fairly comprehensive.	2 pages
Stormwater	Facility	Federal requirements are generally spelled out in the permits with or without the CFR reference.	10 – 25 pages
NPDES	Application ¹	Are either stated briefly or referenced.	30 pages
Wastewater Engineering	Application ²	Incorporated by reference if needed.	1 – 5 pages
Water Allocation	Application	No uniform federal rules.	3 pages
Water Supply Engineering	Application	Both by referencing and reprinting the rule.	1 page
Water Supply Operations	Facility	IAC is incorporated by reference and the IAC mirrors the federal rules.	4 – 15 pages
Wetlands (401/404)	Activity	The 401 certificate issued by DNR is part of the federal 404 certificate issued by the Army Corps of Engineers. 404 certificate lists federal requirements.	2 – 10 pages

¹ The permittee can seek coverage under more than one general permit and coverage may be required under a general permit in addition to an individual NPDES permit.

² Due to project phasing and permit complexity, there has been a gradual increase in multiple permits being issued for one (1) project. This has led to multiple permits under one (1) project number.