



AIR QUALITY CONSTRUCTION PERMITS

PERMIT LENGTH

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

IOWA AIR CONSTRUCTION PERMIT LENGTH

One of the items evaluated was the average length (# of pages) of each Iowa air construction permit document. Permits issued between June 1, 2015 and October 31, 2015 were evaluated in one (1) of five (5) categories:

- PSD – permits issued as part of projects subject to review under the Prevention of Significant Deterioration Regulations.
• SIP – permits issued to facilities that impacted areas identified with ambient concentrations of pollutants exceeding the National Ambient Air Quality Standards (NAAQS).
• GIP – permit issued to facilities that have a large number of identical units subject to the same requirements.
• Minor Title V – permits issued to facilities that are not subject to the Title V permitting program and do not fall in one of the categories listed above.
• Major Title V – permits issued to facilities subject to the Title V permitting program and do not fall into one of the categories listed above.

Table 1 below summarizes the Iowa DNR’s analysis:

TABLE 1 – SUMMARY OF LENGTH OF PERMIT ANALYSIS

Table with 6 columns: Category, # of Projects, # of permits, Highest Average # of Pages per Permit, Lowest Average # of Pages per Permit, Average # of pages per permit for this type of projects. Rows include PSD, SIP, GIP, Minor Title V Source, Major Title V Source, and All Projects*.

* Excludes the project using the GIPs.

PERMIT LENGTH IN OTHER STATES

As part of the survey the Iowa DNR asked other states in the Midwest about the average length of their typical construction permit. One of the factors that impact the permit length is whether the permit is for an emission unit, emission point, project, or a facility. Another factor is how the federal New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) are incorporated. Table 2 shows the results of the survey of the other states.

TABLE 2 – SUMMARY OF PERMIT LENGTH FOR OTHER STATES

State	What Does Permit Cover?	NSPS/NESHAP Incorporation	Permit Length
Illinois	Project	Varies. Usually by reference to applicable requirements identifying in permit the applicability, emission standards, control requirements, testing, monitoring, recordkeeping/reporting, etc.	2 – 100 pages
Indiana	Facility	Federal rules are incorporated by reference and the applicable subpart is attached to the end of the permit.	40 – 400 pages
Kansas	Project	Only discussed if triggered. Generally referenced as “Significant Air Quality Regulations” initially in the permit and then referenced by paragraph for each unit (or group of units) to which they apply. How incorporated varies by permit writer.	5 – 100 pages
Minnesota	Facility	Entire NSPS/NESHAP reprinted in the permit.	1 – 100 pages
Michigan	Project	Varies. Either incorporates by reference or reprints the relevant regulations.	4 – 60 pages
Missouri	Project	By reference in the construction permit.	15 – 30 pages
Nebraska	Facility	By reference. Might cite general requirements, but do not spell out. Used to have more detail, but changed due to compliance issues when subparts changed.	~ 20 pages
Ohio	Emission Unit	Varies. Either by reference to the regulation or by incorporating the relevant requirements in the permit.	5 – 20 pages
South Dakota	Project	Varies. Might just reference the federal standard (PSD permits) or write out the applicable standard (minor construction). Also depends on facility timeline and whether standard language for that rule has already been developed for incorporation into the permit by SD staff.	12 - 100 pages
Wisconsin	Usually Project (Emission Point or Facility possible)	Reprints the relevant parts of the rule in the permit (e.g. emission limits, work practices, etc.)	10 – 100+ pages