Asbestos NESHAP Notification Trends

- Since 2012 there has been a decline in the number of asbestos NESHAP notifications for building demolitions, renovations, and abatement
- The 2014-2016 average number of notifications is 3,875
- Beginning in January 2016, the notification fee applied to all required original notifications
- The fee does not apply to revised or cancelled notifications
- Of the 3,643 notifications submitted in 2016, the fee applied to 2,287 notifications

Asbestos NESHAP Program Updates

- DNR added one asbestos inspector in August 2016 (now have two)
  - After three month training and certification period more inspections are now being conducted
- Increased response to complaints with two inspectors
  - Can get an inspector onsite more often to investigate and provide needed assistance
- Continue to conduct outreach/education to communities
  - redevelopment projects, and
  - response to natural disasters, i.e. tornadoes and floods
- Provided new electronic asbestos notification system in March 2017
  - Notify and pay fees online
  - Access system 24/7
  - Easily revise and cancel notifications

<table>
<thead>
<tr>
<th>Activity (FY 17)</th>
<th>Number</th>
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</thead>
<tbody>
<tr>
<td>Asbestos Inspections</td>
<td>152</td>
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<tr>
<td>Outreach Visits</td>
<td>46</td>
</tr>
<tr>
<td>Complaints Received</td>
<td>85</td>
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Construction Permit Slides

Construction Permit Issuance and Lead Times

- Chart showing the total number of actions for each calendar year from 2012 to 2017.
- Graph with bars indicating the number of actions and lines showing the 2017 projection and standard average leadtime.
Recent Efficiencies

• Easier to Complete Application Process
  – Common sense forms with clear instructions
  – Stable and predictable leadtimes
  – Development of SPARS replacement criteria and evaluation of replacement options

• Easier to Understand Permits
  – Updated Permit Framework
  – Creation of collection of air permits (CAP) option

Recent Efficiencies

• More Consistent Permits
  – Established internal consistency coordinator
  – Updated Manual and SOP

• Business Assistance Tools
  – Permit modification necessary factsheet
  – Construction activities allowed prior to permit issuance factsheet
  – Change in ownership FAQ
Business Assistance Tools

- Reduced model concentrations through improved characterization of surface friction velocity (Adjusted-\(u^*\))
  - Updated 19 preprocessed meteorological data sets to include new algorithm
    - Conducted sensitivity analysis: Significant concentration reductions from emissions releases in complex terrain, from ground-level sources, and for short term averaging periods
Business Assistance Tools

• Reduced model over-prediction and allowed for more appropriate source characterization
  — Implementation of Appendix W changes
    • Regulatory options to address plume rise for horizontal and capped stacks
    • Nitrogen Dioxide Tier 2 and Tier 3 screening techniques
  — Reviewed and updated modeling guidance, checklists, and templates to incorporate Appendix W changes

Business Assistance Tools

• Simplified, easier to use approach for modeling determinations
  — Updated Form MD
  — Common sense instructions
• Implementation of new methodology for determination of air resource use
  — Database of modeled concentrations
  — Air Summary Report
Air Program Assistance Activities

• Ensured no impact of monitoring network changes on background values
• Fast tracked modeling for construction projects in nonattainment & maintenance areas
  – Muscatine (SO2 and PM2.5)
  – Buffalo (PM10)
• Reduced costs for implementation of SO2 Data Requirements Rule
  – Round 2: modeled three areas
  – Round 3: modeled three areas (one cross state)
Title V Permits Issued & Lead Time
2013 - 2017

- Permits Issued
- Lead Time
- Permit Goal
Recent Improvements

- Timely permits:
  - 41 hrs/permit (avg since 1/15/16)
  - < 5 month turnaround time (avg since 1/15/16)
- Reduced backlog (applications older than 18 months)
  - 48% reduction since 1/15/16
  - Highest % of on-time permits in EPA R7

Recent Improvements

- Easier to Apply (2016 VSM)
  - Allowing use of old forms & photocopies
  - Simplified forms, including Excel versions
  - Pre-application meetings
- Timely modifications
  - 240% increase between 2015 and 2016