IOWA Department of Natural Resources

Air Quality Construction Permits

Is Modification to My Air Construction Permit Needed?

This fact sheet provides additional clarification on when an air construction permit modification may or may not be needed, as specified in 567 Iowa Administrative Code (IAC) Chapter 22.1(1). The administrative code states *"no person shall construct, install, reconstruct or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit."* Table 1 pairs common modification scenarios with the appropriate action steps to be taken by the applicant. If the scenarios in Table 1 do not address your particular situation, please either refer to the Equipment Modification FAQ or contact our toll free helpline at 1-877-AIR-IOWA for assistance.

Table 1 groups modifications into four common categories: General, Equipment Relocation, Stack Parameter Alterations and Emission Unit Alterations. Within these categories, 23 common scenarios are identified with a corresponding action step for each scenario ("Yes," "No" or "Maybe").

A modification of your air construction permit may not be necessary for all "Maybe" scenarios, but a determination request regarding the proposed change, as specified in 567 IAC Chapter 22.1(3)"a", is required so the DNR can determine if the proposed change meets all regulatory requirements. Or, the applicant may choose to submit an air construction permit application rather than make a determination request due to project time constraints.

The purpose of evaluating stack parameter changes or equipment relocations is to ensure any changes do not affect attainment of the National Ambient Air Quality Standard (NAAQS). Even if the altered stack parameter has not been relied on in a previous NAAQS analysis, some changes may still require modification of your air construction permit.

Action Steps for Modification Scenarios

- ✓ **Yes:** The applicant should submit an air construction permit application.
- ✓ **No:** An application does not need to be submitted to the DNR. If multiple changes are proposed, then each proposed modification must meet the "No" criteria specified in Table 1 before no further action is required of the applicant.
- ✓ **Maybe:** The applicant should either submit a request that the DNR determine if an air construction permit modification is necessary or submit an air construction permit application to the DNR.

For alterations to an emission unit, a determination request or permit application is required. A DNR engineer will evaluate your request and determine if a permit modification is needed. A formal written response of the DNR's determination will be sent to the applicant once our review is complete.

For assistance, contact the DNR Air Quality Construction Permit Help-line at 1-877-AIR-IOWA.

TABLE 1: COMMON MODIFICATION SCENARIOS

		Scenario	Modification Needed?		
			Yes	Maybe	No
General	1	Change in Ownership[1]			✓
	2	Change in Facility Name			✓
	3	Complete removal of all permitted equipment associated with an emission point[2]			✓
Equipment Relocation[3]	4	Relocation of internally vented equipment within the same building			✓
	5	Relocation of internally vented equipment to a new building		✓	
	6	Relocation of externally vented equipment or stack		✓	
Stack Parameter Alterations[3]	7	Stack discharge style changes from Downward to Horizontal/Vertical Obstructed/Vertical Unobstructed			✓
	8	Stack discharge style changes from Horizontal/Vertical Obstructed/Downward to Vertical Unobstructed			✓
	9	Stack discharge style changes from Vertical Unobstructed to Horizontal/Vertical Obstructed/Downward	✓		
	10	Any stack, whose actual height is ≥ 125% of the permitted value	✓		
	11	Any stack, taller than 52 feet, whose actual height is within one foot of the permitted value			✓
	12	Any stack, with a height ≤ 52 feet, whose actual height is less than the permitted value	✓		
	13	Any stack, taller than 65 feet, whose actual diameter is within 10 inches of the permitted value			✓
	14	Any stack, with a height ≤ 65 feet, whose actual diameter does not conform to the permitted value		✓	
	15	A change in exhaust flowrate more than ± 25% of the permitted value in scfm	✓		
	16	A change in exhaust temperature more than ± 25% of the permitted value in °F	✓		
	17	Replacement of a stack that conforms to all permitted values at the same location except for deviations allowed above.			✓
Emission Unit Alterations	18	Change in emission limit, operating limit, recordkeeping requirement or monitoring requirement in a permit	✓		
	19	Complete replacement of permitted equipment	✓		
	20	Partial replacement of permitted equipment[4]		✓	
	21	Replacement or modification of control equipment		✓	
	22	Any change in capacity or a change in the method of operation of existing permitted equipment		✓	
	23	Removal or addition of equipment to a permitted emission point[4]	✓		

[1] See 567 IAC 22.3 (8) for ownership change notification requirements.

[2] Submit a written request to rescind your air construction permit to the DNR Air Quality Bureau that includes your plant number and applicable permit numbers.

[3] If the equipment involved in PSD, NA NSR or SIP maintenance plan permitting then additional evaluation may be necessary. Please contact DNR for additional guidance.

[4] Refers to replacement, removal or addition of an emission unit when multiple emission units exhaust to a single stack.