



# Title V: Air Permits for Iowa's Largest Facilities

Created as part of the federal Clean Air Act Amendments in 1990, the Title V program ensures larger industries comply with air quality requirements - protecting health, safety and economic opportunities for Iowans. Air quality regulations placed upon industry through state and federal rule requirements are varied and can be quite complex. A Title V permit compiles these regulations for a facility into a single document. Part of this permitting process includes deciding if existing monitoring requirements are enough to ensure ongoing compliance with the appropriate requirements. Once completed, a Title V permit helps the facility comply, and the DNR inspect and review compliance. Consistent compliance and comprehensive inspections lead to improved air quality.



Clean air is vital for everyone. The Title V program is part of a comprehensive regulatory system that works on the local, state and federal levels to ensure healthy air quality for all.

### OTHER BENEFITS INCLUDE:

- Ensure states have sufficient resources to administer the program by charging fees.
- Provide practical methods for determining compliance with requirements.
- Require regular reporting on the facility's compliance with emission limits and monitoring requirements.
- Opportunity for public participation.

### FACILITY RESPONSIBILITIES

- Submit annual compliance certifications, stating compliance status of each requirement included in the Title V permit.
- Submit semi-annual monitoring reports
  - Report summarizes the monitoring requirements included in the Title V permit.
  - The report also includes all instances of deviations from permit requirements.
- Yearly emissions inventory
  - Facilities submit an inventory of the actual emissions of air pollutants from each emissions source at the facility in tons per year.
  - Annual fees are assessed on each facility based on total tons of pollution emitted.

## MONITORING

Under the Title V program, two levels of monitoring ensure proper operation and maintenance of pollution control units.

- Periodic Monitoring - Using Iowa DNR's *Periodic Monitoring Guidance*, the facility collects data demonstrating the emission unit's ongoing compliance with permit limits.
- Compliance Assurance Monitoring (CAM) - This is a federal requirement implemented through the Title V program.
  - CAM plans are required for the largest controlled emission units at a facility. These emission units would cause a greater impact on the surrounding area if the control equipment was not operating correctly.
  - Establishes "indicators" and minimum observation frequencies for the facility to monitor in order to assure compliance with the permit.

### Who Needs a Title V Permit?

Only the largest industrial facilities.

- Facilities with potential air emissions of greater than 100 tons per year of any of the following pollutants:
  - Particulate Matter less than 10 micrometers in diameter (PM<sub>10</sub>)
  - Sulfur Dioxide (SO<sub>2</sub>)
  - Nitrogen Oxides (NO<sub>x</sub>)
  - Volatile Organic Compounds (VOC)
  - Carbon Monoxide (CO)
  - Lead
- Or, facilities that have the potential to emit Hazardous Air Pollutants (HAP) as follows
  - 10 tons per year for any single HAP
  - 25 tons per year of total HAPs from the source

## TITLE V PERMITTING PROCESS

- Once a facility becomes subject to Title V, they have 12 months to submit a complete application to the permitting authority.
- Before a Title V permit can be issued, it must go through two review periods.
  - A 30-day public comment period where concerned citizens can review the draft permit and submit comments on the permit or request a public hearing.
  - A 45-day U.S. Environmental Protection Agency (EPA) review period where the EPA regional office can review the draft permit and submit comments.
- Within 60 days after the EPA review period closes, citizens can petition the EPA regional office requesting an objection to the permit.
- The DNR issues each permit for up to five years. Near the end of the permit term, the facility must apply for a complete renewal of the Title V permit, which will be reviewed by DNR.

While a Title V permit does not impose new emissions requirements on affected facilities, air quality is improved through a greater understanding of the requirements and compliance status of the largest industries in the state.

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