



IOWA DEPARTMENT OF NATURAL RESOURCES

LEADING IOWANS IN CARING FOR OUR NATURAL RESOURCES

CAP – A New Way to Permit

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A History of Construction Permit Efficiencies

Construction Permit Efficiency History



- Eight formal kaizen events since 2003
 - Focused on:
 - Flow of application
 - Standard versus complex applications
 - Consistency of review
 - Obtaining accurate information
 - Providing applicant assistance
 - Efficient intra-agency interaction
 - Eliminate unnecessary processes or programs

Construction Permit Efficiency History



- Goals:
 - Increase permit issuance rate (i.e. shorten leadtime)
 - Provide better communication with applicants and public
 - Improve consistency in permits
 - Eliminate non-value added and non-mandatory activities
- Continually looking for additional improvements

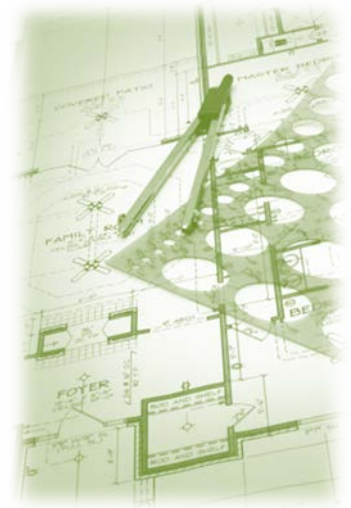
2015 Dual LEAN Design Events



- November 30 – December 4, 2015
- **Event 1:** Create multiple emission point permit
 - Result = CAP (Collection of Air Permits)
 - Available March 16, 2016
- **Event 2:** Redesign permit framework
 - Result = New permit layout
 - Available February 4, 2016

Permit Framework Redesign

- New format with emphasis on improving compliance through:
 - Improved readability; and
 - Important requirements up front
- Highlights
 - General conditions in back
 - NSPS/NESHAP tabular format
 - Combined operating limits and monitoring sections



Collection of Air Permits (CAP) Permit Option

What is a CAP?



- CAP = Collection of Air Permits
- A consolidation of multiple permits into one document
 - Still have an individual permit for each emission point.
 - Important for severability

CAP Benefits

- Eliminate duplication of identical requirements
- Eliminate potential for inconsistencies of language between permits with identical requirements
- Consolidate more requirements and permit conditions into tables
- Potential cost savings in modifying one document versus multiple individual permits





Best Uses for a CAP (1 of 2)

- Organize emission caps over several permitted pieces of equipment
- Combine permits for emission point/units often modified together
- Combine emission units with multiple emission points



Best Uses for a CAP (2 of 2)

- Combine all emission points/units within a process or process line
- Combine all emission points/units with same federal requirements (e.g. NESHAP limitations)

How do I apply for a CAP?

- Check the box on the Form CP
- NOTE: Review Engineer may mention as option if they see value for your facility or application



CAP Resources Available

- CAP Fact Sheet
- CAP Frequently Asked Questions (FAQ)

www.iowadnr.gov/airconstructionpermits

– General guidance tab



CAP Progress

- Since March 16, 2016
 - 20 CAP documents
 - Combining 83 individual permits
 - For 17 different facilities
 - 50/50 major and minor sources



Construction Permits: Future Efficiency Focus

2015/2016 Efficiency Improvements

- 2 LEAN Design Events
 - Permit Framework
 - CAP
- New Guidance
 - Permit modification necessary FAQ?
- Revitalized Application Forms
 - Culminated in some significant improvements



Types of Construction Permit Projects

Standard

- Any Project that is Not Classified as Complex

PSD / NA NSR Complex

- New Major Sources in both Attainment and Non-attainment Areas
- Major Modification at Existing Sources in both Attainment and Non-attainment Areas
- Amendments to PSD / NA NSR Permits (even if change is not a major modification)

Other Complex

- Greenfield Ethanol Plants
- PSD / Non-attainment NSR Netting
- PSD / Non-attainment NSR Synthetic Minor
- Projects involving Legal (e.g. Consent Order, Compliance Order, Permit Appeal)
- State Implementation Plan Maintenance Area Changes
- Any other Project requiring Public Comment

Construction Permit Statistics

	5-yr Average (2011 – 2015)	2016 (as of 10/5/2016)
Standard Projects	430	351
Standard Permit Actions	1413	967
Standard Project Average Leadtime	68 days	39 days
PSD/NA NSR Complex Projects	25	29
PSD/NA NSR Complex Permit Actions	142	141
PSD/NA NSR Complex Project Average Leadtime	186 days	138 days
Other Complex Projects	32	38
Other Complex Permit Actions	377	224
Other Complex Project Average Leadtime	297 days	269 days

Future Efficiency Focus

- New Applicant Guidance
 - Allowed Construction Activities
 - Change in Ownership
- Continued Internal Consistency Focus
- Additional Form Updates
- Explore Additional Permit Streamlining Options
- e-Application

