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 Area Changes
- Any other Project requiring Public Comment
## Construction Permit Statistics

<table>
<thead>
<tr>
<th></th>
<th>5-yr Average (2011 – 2015)</th>
<th>2016 (as of 10/5/2016)</th>
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<tbody>
<tr>
<td>Standard Projects</td>
<td>430</td>
<td>351</td>
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<td>Standard Permit Actions</td>
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<td>Standard Project Average Leadtime</td>
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<td>Other Complex Project Average Leadtime</td>
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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