

Prevention of Significant Deterioration (PSD)

Pre-application Meeting

Frequently Asked Questions (FAQ)

Disclaimer

This document is intended to serve as guidance only, and does not take the place of any rule or law. This document may not reflect changes in rule or law that occur after the date noted below. Please contact DNR for the most recent applicable rules.

Finally Linn and Polk Counties have their own permit programs and may have differing or additional guidance.

1) Is a pre-application meeting required? Should I request a pre-application meeting with IDNR?

A pre-application is not required, however without a pre-application meeting the Department cannot stand by its one hundred eighty (180) day goal for the issuance of permits for a PSD project.

2) What is the purpose of the pre-application meeting?

The pre-application meeting provides the Department an opportunity to review the draft application and provide guidance to the applicant of suggested changes and potential issues with the project. This allows the applicant an opportunity to update the application prior to submittal so a better final application can be submitted which in turn reduce the number of information requests during the official review of the project.

3) When is the pre-application meeting to occur?

The pre-application should take place when the application is nearly complete (approximately 80% complete) and within ninety (90) days of submitting the final complete application to the Department.

4) Does the meeting have to be at the Air Quality Bureau Office?

The pre-application meeting may take place anywhere. Generally this takes place at the Air Quality Bureau offices. In some circumstances it may be helpful to have the meeting at the facility so that department staff can get a better understanding of how the new equipment will contribute to the rest of the facility.

5) When does EPA Region 7 get involved in PSD projects in Iowa?

EPA will review and comment, when necessary, on all draft PSD permits. EPA asks for two (2) weeks to review the draft prior to the public comment period. EPA will participate earlier in the permitting process if requested. Typically for new projects the Department tries to involve EPA

Region VII in the process as soon as possible to avoid delays during the comment period. For modifications of past PSD permits the Department does not involve EPA until the end of the project unless specific guidance is needed from EPA.

6) Can you have an introductory meeting prior to application development?

Yes, one or more introductory meetings can be held at the applicant's discretion. However, an 80% pre-application meeting not more than ninety (90) days before the planned submittal of the final application to the Department is still recommended.

7) What should happen if a company wants to start the process earlier than when the application is nearly complete and nearing submittal?

The Department has no problem having additional meetings about the proposed project further than three (3) months from the submittal period. However, the Department would like the opportunity to discuss the application at the 80% stage within three (3) months of submittal to provide greater assurance of a complete final application.

8) What is needed for the pre-application meeting?

The applicant should submit an agenda and the 80% application.

The agenda should include:

- Items applicant wishes to discuss at the meeting
- List of people attending
- List of staff you'd like to have attend
- Whether or not the company wishes for EPA to be involved in the pre-application meeting.
- Preferred meeting location
- Estimated meeting duration

9) Is the 80% complete application to be submitted before the pre-application meeting?

Yes, the Department requests that the 80% complete application be submitted at a minimum two (2) weeks prior to the pre-application meeting so that the applicant can get the best feedback possible.

10) For the pre-application meeting and the requirement of having the application nearly complete, the Responsible Official does not want to sign this document, how should this be handled?

For the pre-application and the 80% complete application, the Responsible Official does not need to sign the application. Only the final application that is submitted to the Department needs to be signed.

11) What do you expect in an 80% complete application?

An 80% complete application would include

- a full description of the project (including any debottlenecking and other associated emission changes),
- Location of the new or modified facility
- List of nearby facilities that could be considered support facilities or are under common

control

- Preliminary BACT analysis
- Anticipated controls and emission rates with emission calculations,
- construction quotes, bids, estimates,
- a preliminary soils and vegetation analyses,
- a modeling protocol (if it has not already been approved) and any modeling that has been done to date,
- Drafts of completed application forms, etc.
- [MACT / NSPS](#) applicability
- Company's plans to address pre-construction monitoring

12) What does the Department what to accomplish at the pre-application meeting?

The Department is interested in covering the following items:

- [Forms required in the application](#)
- Clarify the permitting process for company and public.
- Discuss site-specific issues.
- Discuss control technologies that are anticipated/acceptable.
- Local air quality concerns (NAAQS, increment, others).
- Explore pre-construction monitoring and dispersion modeling.
- Modeling Protocol
- Additional Impact Analysis
- Identify similar permitting examples
- BACT process and documentation requirements
- Monitoring, testing, recordkeeping
- Economic feasibility
- Establish communication expectations, procedures and responsibilities.
- Discuss application formatting and number of copies required.
- Confidentiality
- Allowable pre-permit activities
- EPA's role
- Establish the timeline for the review process.
- Discuss the DNR's policy for determining the priority of the project.

13) Does the Department charge for the pre-application review?

Yes. Form AF shall be submitted along with the first information submitted for pre-application review through either construction permitting or dispersion modeling. For example, if the ambient air analysis is submitted first for pre-application review then the applicant should submit the Form AF with ambient air analysis.