

AIR CONSTRUCTION PERMIT BASIC INSTRUCTIONS

The DNR wants to make sure your air construction permit application submittal is successful; therefore, at any time during the application process, please contact the DNR at 1-877-AIR-IOWA (1-877-247-4692) for help or clarification.

Starting January 1, 2023, applications are required to be submitted through the <u>lowa EASY Air</u> (Iowa <u>Environmental Application System for Air</u>) online application system. It is a web-based, secure system available for submitting permit applications.

For more information on Iowa EASY Air, instructions for creating an account, or instructions for completing the various application types, please visit the DNR <u>Air Quality's eServices</u> webpage. If you have any system-related comments or questions, please contact the Iowa EASY Air Help Desk by email at <u>easyair@dnr.iowa.gov</u> or by phone at 515-725-9569 or 515-725-9547.

As indicated in Iowa rules (567 IAC Chapter 22), an air construction permit is required before installing or altering any equipment that emits, or potentially emits, an air contaminant. The DNR's Air Quality Bureau is responsible for the review and approval of all air construction permitting in Iowa with the exception of Linn and Polk counties where local air programs are present. Please contact the appropriate local air program if your facility is located in one of these counties.

The purpose of the air construction permit application is to provide complete data about the equipment, emission point(s), and control equipment in your project to help the DNR ensure, not only that your facility complies with state and federal laws, but also that the air quality in the State of Iowa is protected. There are several pieces of information the DNR needs to be able to issue a permit; therefore, to ensure your application is complete and can be processed expediently, please follow these steps:

1. Familiarize Yourself with the Application Types

Depending on the purpose of the project, your application will be identified as one of the following application types:

- **Construction Permit Standard Application.** This application type is the most common and it is used when the application types described below are not applicable.
- **Construction Permit Templates.** Applicants may use a permit template if the equipment and processes meet the type, limitations, and conditions in the applicable template.
 - a. Aggregate Processing Plant. This permit template is only applicable to an "aggregate processing plant" not otherwise excluded.
 - **b. Bulk Gasoline Plant.** This permit template is only applicable at a "bulk gasoline plant" as defined in the permit that is located at an area source of hazardous air pollutants (HAP) and that is has a gasoline throughput of less than 20,000 gallons per *month* (Small Bulk Gasoline Plant or less than 20,000 gallons per *day* (Large Bulk Gasoline Plant).
 - **c. Concrete Batch Plant.** This permit template is only applicable to a "concrete batch plant" not otherwise excluded or in prohibited location.
 - **d. Group 2 Grain Elevator.** This permit template is only applicable to country grain elevators, country grain terminal elevators, and grain terminal elevators as defined in 567 lowa Administrative Code (IAC) subrule 22.10(1) that meet the Group 2 requirements specified in 567 IAC 22.10(3).
 - **e. Hot Mix Asphalt Plant.** This permit template is only applicable to a "hot mix asphalt facility" not otherwise excluded.



- Construction Group 1 Grain Elevator. The Group 1 Grain Elevator Registration applies to grain elevators meeting all applicable requirements established in 567 IAC 22.10(3)"a" and with a PM₁₀ potential to emit of less than 15 tons per year.
- Construction Paint Booth Permit-by-Rule. To be eligible for a permit by rule for spray booths, a facility must meet all applicable requirements established in 567 IAC 22.8(1) and must certify that the facility currently is or will be in compliance with or otherwise exempt from the requirements of National Emissions Standards for Hazardous Air Pollutants (NESHAP) Subparts HHHHHH and XXXXXXX.
- **Construction Permit Determination.** Facilities wishing Department input on whether a propose change requires a new construction permit or the modification of an existing permit may submit a construction permit determination request.
- **Construction Permit Pre-Application.** Facilities wishing Department input on their draft permit application or any other information associated with a future application may submit a construction permit pre-application.
- **Construction Permit Plantwide Applicability Limitations (PAL).** Facilities subject to New Source Review may request a PAL on emissions, provided the provisions in 40 CFR 52.21(aa) are met.

2. Familiarize Yourself with the Application Forms

Below is a list of all the standard application forms that could be included in an air construction permit application. These forms are built into the Iowa EASY Air application and are no longer available in paper format. Depending on the nature of the project, choose the forms needed for the equipment you are installing or modifying. Instructions for how to complete each form may be found at <u>Air Quality's eServices</u> webpage under the instructions tab, under Construction Standard Application Instructions.

- Form AF: Construction Permit Application Fee. This form identifies the fee required for the review of the air quality construction permit application(s).
- Form FI: Facility Information. This form identifies your company or facility, equipment location, and personnel involved in the permit application.
- Form CP: Project Cover Page. This form provides a description of your company or facility and the purpose for your application and project.
- Form EU: Emission Unit Information Forms: Include in your application a form for *each* emission unit in your project, even if multiple emission units vent through the same emission point. Choose the EU form for your equipment type.
 - a. Miscellaneous (for any equipment not identified below).
 - b. Internal Combustion Engine
 - c. Nonmetallic Mineral Processing Plant (Fugitive Only)
 - d. Spray Paint Booth

Note: When completing a Spray Paint Booth EU form, you will need to include a specific Form CE for dry filters, if they are used. However, fill out the general Form CE if control equipment other than a dry filter system is applied to the booth.

e. Cooling Tower

Note: When completing a Cooling Tower EU form, you will need to include a specific Form CE for a mist eliminator, if it is used.

- f. Boiler
- Form CE: Control Equipment Forms: If applicable, include in your application a form for *each* piece of control equipment or control measure. Choose the CE form for your control equipment or control measure type.
 - **a. Miscellaneous** (for any equipment not identified below).
 - b. Fabric Filter
 - c. Cyclone
 - d. Wet or Dry Scrubber
 - e. Thermal Oxidation
 - f. Catalytic Oxidation



- g. Catalytic and Non-Catalytic Reduction
- h. Dry Filter
- i. Mist Eliminator
- **Form EP: Emission Point Information.** This form identifies the emission point (stack or vent) associated with the emission unit(s) included in the permit application.
- Form EC: Emission Calculations. This form aids in understanding the processes being permitted and to verify the methodology of emission calculations. The information on this form is critical, because it provides the most accurate description of your potential air emissions.
- Form EI: Facility Emission Inventory. This form provides information on plant-wide total emissions and emissions from each emission point. Total emissions are used to classify the plant into the appropriate categories for the Prevention of Significant Deterioration (PSD) and Title V programs.
- Form GHG: Project Greenhouse Gas Emission Inventory. This form provides information on total greenhouse gas emissions for the project and for each emission point in the project.
- Form MD Non-PSD Modeling Determination. This form assists applicants in determining whether an air
 dispersion modeling analysis will be required for non-PSD construction permit projects. It is used for both new
 construction permit projects and for modifications to previous projects.
- **lowa Easy Air Attachments.** Attachments may be uploaded to the application electronically to assist the assigned engineer with completing the project.
- Multiple Emission Points or Control Equipment: Remember to include an emission unit form for each emission unit that vents to an emission point; a Form EP for each emission point being permitted and a control equipment form for each piece of control equipment or control measure included in the project. If a source has more than one stack per emission unit, then it will need a separate Form EP for each stack.
- PSD Application: If you are submitting a PSD application, additional information may be required. Please contact
 Peter Zayudis, Construction Permit Supervisor, at peter.zayudis@dnr.iowa.gov or 515-201-4596, prior to
 submitting the application.

3. Gather Additional Information to Help You Complete the Application

Several pieces of information and resources will help you complete the application. These include:

- Manufacturer's Design Literature or Operation Manual
- Manufacturer's Emissions Data
- Safety Data Sheets
- Fuel description and specifications from fuel supplier
- EPA Emission Factors at https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-air-emission-air-e
- SIC Codes at https://www.osha.gov/pls/imis/sicsearch.html
- NAICS Codes at http://www.naicscode.com/
- Estimation of Emissions for Form EC (https://www.iowadnr.gov/portals/idnr/uploads/air/conpermit/estimation_methods_form_ec.pdf)
- Construction Permit Application Detailed Instructions (https://www.iowadnr.gov/Environmental- Protection/Air-Quality/eAirServices?utm medium=email&utm source=govdelivery#Instructions-274)



4. Confidentiality Requests

If confidentiality is requested, two copies of the construction permit application must be provided - one with all required information (via paper only) and the second with the requested confidential information redacted (through our on-line system). Please note that the confidentiality request must use our confidentiality request form and it must be reviewed by DNR legal counsel to ensure it meets the requirements specified in 561 IAC 2.5(7). For questions regarding confidentiality requests, please contact Kelli Book, DNR Attorney, at Kelli.Book@dnr.iowa.gov or at 515-210-3408.

5. Submit Your Application

Please use the lowa EASY Air to submit air construction permit applications. Please use one submission to include multiple emission points.

6. Track Your Application

Once your application is submitted, you may track its receipt and progress through the permitting process using either the Iowa EASY Air Public Inquiry Portal or the Construction Permit Search page on our website.

Iowa EASY Air Public Inquiry Portal https://programs.iowadnr.gov/easyair/Public/GovEnt/Shared/Pages/Main/Login.aspx

Construction Permit Search https://idnraqrr.iowadnr.gov/ConPermitSearch