



# IOWA DEPARTMENT OF NATURAL RESOURCES

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LEADING IOWANS IN CARING FOR OUR NATURAL RESOURCES



# How Iowa's Permitting & Enforcement Groups Work Together and Lessons Learned

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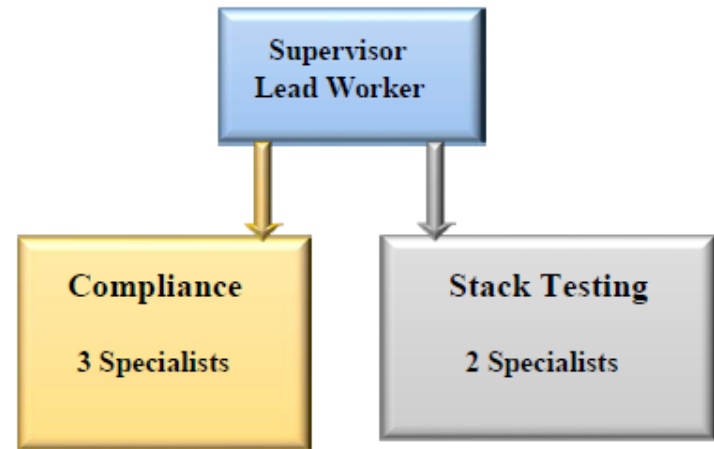
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# Central Office – Des Moines

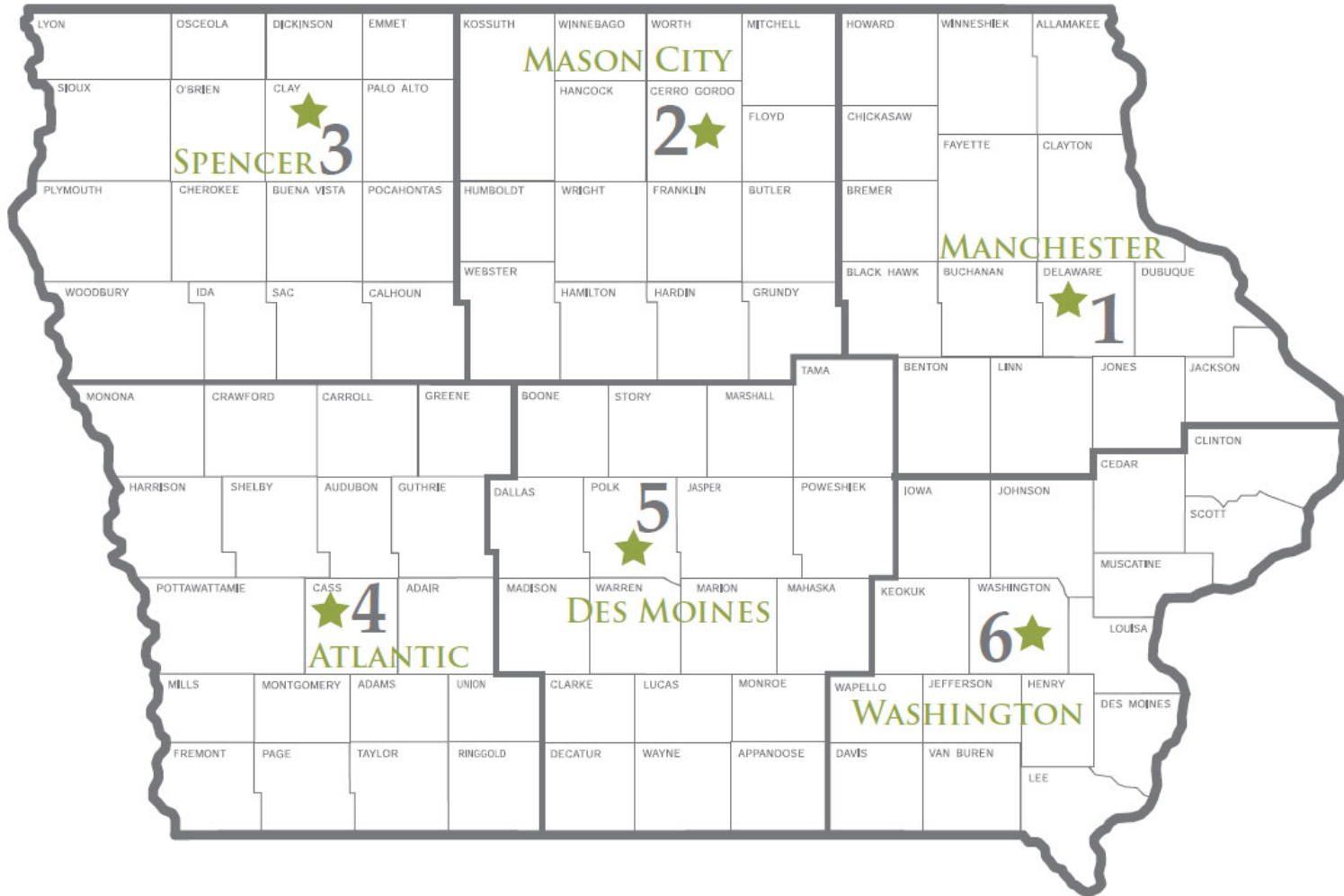
## Permitting Sections



## Compliance Section



# Field Offices



# Air Quality – Core Purpose

- Protect Public Health & Welfare
  - Health
    - National Ambient Air Quality Standards (NAAQS)
  - Public Welfare
    - Economic viability of an area
    - Property values
    - Other more traditional measures



# What is a Permit?

- Legal tool
  - Extension of the regulations
    - Reflects outcome of permit review process
    - Defines what is expected of source
    - Primary basis for enforcement
  - Basically a contract
    - Between company and regulatory agency



# Permitting & Enforcement

- Separate but linked
- Enforceability
  - Chief concern
    - Clarity of standards important to:
      - Permit writers
      - Compliance
      - Regulated community
      - Public
    - Recordkeeping, reporting, and monitoring



# 2009 CAA Enforcement Workshop

- Disconnect between enforcement & permitting?
  - Possible reasons
- Opportunities for better coordination
  - Avoid “commingling”
- Best practices to ensure effective coordination





# Effect of Little to No Coordination

- **The Good**

- Reduced emissions example



- **The Bad**

- Misuse of the term BACT
  - Causes confusion
  - Companies try to use Consent Order “BACT” limits in future permitting



- **The Ugly**

- No NAAQS review
- Consent Order terminated early
  - Lost limits



# Iowa – Separate Job Functions

## Permitting

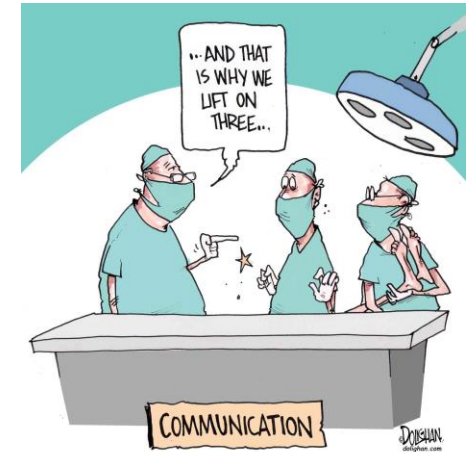
- Applicability determinations
  - PSD
  - NSPS
  - NESHAP
- Permit writing
- Requests for information
- Site visits
- Technical assistance

## Compliance

- Stack test reviews
- Variances
- Investigate potential violations
- Compliance reports
- Inspections (Field Offices)
- Enforcement letters
- Referrals
- Compliance assistance

# Communication/Coordination

- Section meeting attendance
  - Representative from each section
- Work requests
  - Provides documentation
- Some draft permits sent to compliance
  - Evaluate enforceability & testing
- Some draft referrals sent to permitting
  - Review technical aspects and applicability
  - Review permitting timelines





## Lessons Learned

- Constant communication is necessary
  - Regular meetings
  - Talk to other sections ➡ ask questions
- Discuss specific areas of concern
  - Permit or Consent Order language
    - Enforceability
    - Agreement on what the language says
  - Stack testing requirements
- Training
  - Basic understanding of other areas

**Mistakes**  
**Are The**  
**Stepping Stones**  
**To Learning!**



Questions?



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