

IOWA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

REC-111-00 P. 1-02 POLICY/PROCEDURE STATEMENT

TOPIC: Construction Initiation Timing (For All Non PSD Sources)

Policy Procedure Number: 3-b-0.7

Replaces Number:

Date: 5/1/98

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Preparer: David Phelps

Reviewer:

Approval: Bureau Chief: Peter Hamlin

PAN

Date: 6/15/98

Division Administrator: Allan Stokes

[Signature]

Date: 5/27/98

Applicable Code of Iowa or Iowa Administrative Code Rule:

IAC 567 Chapter 22

Attachments: NONE

REASON OR BACKGROUND

Section 22.1 of the Iowa Administrative Code defines when a source is required to obtain a construction permit. It further states "A permit shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary sources." The delay between the time the construction permit application is submitted and when a permit is issued is an imposition on the regulated community. In limited applications when Prevention of Significant Deterioration (PSD), New Source Performance Standards (NSPS) and National Emissions Standards for Hazardous Air Pollutants (NESHAPS) have not been involved, the Department has allowed construction to begin. The purpose of this policy is to add guidance and consistency to those situations in which an applicant wishes to start preparatory work prior to obtaining the construction permit.

DETAILS

For sources which do not invoke PSD, NSPS, and NESHAPS requirements, the applicant will be allowed to do preparatory work if a construction permit application for the project has been submitted. This work may only be started after notifying the IDNR in writing of the applicants intentions. The applicant must assume any liability for this activity and will be required to make any modification to the source that may be imposed in the final construction permit different from what has been installed, or remove the equipment. Initiation of preparatory work is not a guarantee that a permit will be issued.

For purposes of this policy preparatory work will be defined as moving dirt, installing foundations, erecting buildings, and locating equipment. In no case shall the applicant be allowed to hook up the equipment to the exhaust stack and/or operate the equipment in any way that may emit any pollutant prior to receiving a construction permit.