Iowa Access Project Plan

Project: Environmental Permitting

Project Lead(s): Stan Kuhn, DNR

Project Budget: $270,000

Updated Dated as of 7/15/97

Mission Statement:

To further the use of electronic technology for the submission, interactive review, public dissemination and comment, and issuance of environmental permits, and related reporting or renewal requirements.

Define the Problem or Need:

Needs Statement
A description and system summary, by type of permit, for each environmental permit issued by the DNR is needed by the project team to better understand DNR's current practices. This information will aid the project team in identifying opportunities for permit system improvements and making recommendations.

(Note) A narrative description of major environmental permitting systems is attached. This description was provided to team members and reviewed at the team meeting July 10, 1997.

Problem Statement
The Iowa Utility Association, the Iowa Association of Municipal Utilities, the Iowa Association of Business & Industry, and members of the regulated community are concerned that Iowa's environmental permitting process may be hindering business investment and development.

The Governor's Competitiveness Task Force Regulatory Reform Sub-Group issued a *Findings and Recommendations report* (Task Force Report) December 27, 1995. The Task Force Report made a number of recommendations, focusing on the desirability of improving permitting turn-around time and improved communications with customers.

The focus of this concern is DNR's implementation of the federal Clean Air act. Upwards of 1,800 construction permits for air-related facility development must be issued annually. Prompt handling of construction permit applications is highly desirable to enable business to keep construction of new or renovated facilities on schedule.

Additionally, facility Air operating permits must be reviewed, issued and renewed every five years. Operating permits heavily impact 300 or so major Iowa industries and utilities. The applications have been submitted. Related permits must be issued within the next three years. These industries and utilities must provide annual reports and some have special reporting requirements.

The Task Force Report commented extensively on problems with current paper-based applications and permits. Documents are lost or misfiled. Information cannot be easily retrieved for reporting or analysis. Resubmitting information is costly.

The DNR and business agree an extensive database for air related information would be a cost-effective tool, both for DNR and for the private sector. National reporting to the EPA could be done more effectively with a comprehensive database.

Similar issues exist in other Environmental Permitting areas.

The associations' concerns are focused in three areas:
1. Application turn around time. Implementation of new or upgraded facilities and processes is delayed until a permit is received.
2. Application status. Applicants want the capability to readily check on application status.
3. Data availability. Applicants want the ability to easily retrieve information previously provided to the DNR. The DNR cannot easily retrieve and provide this information from existing paper-based records.

Related concerns revolve around the necessity of protecting propriety business information from disclosure to unauthorized parties, and meeting legal requirements, i.e., electronic signatures.

Electronic permitting systems can be used in other environmental permit areas such as water supply and wastewater. However, business and industry are supporting development of electronic technology within the Air permitting programs and expect DNR's efforts to address air permits first.

Client Population

Air construction permits affect approximately 1,000 small and 500 to 800 large businesses and utilities annually. Approximately 300 large air emission sources are required to obtain air operating (Title V) permits. These 300 emission sources comprise the largest employers, both industry and utilities with facilities in Iowa. About 50% to 60% of the larger firms use consultants to apply for permits. About 80% of the consultant work is done by 25 firms. Another 300 or so businesses obtain voluntary operating air permits. (Accepting limits significantly less than the theoretical maximum voluntarily avoids the work associated with a higher level Title V permit application.)

A subset of the Air data must be reported to the EPA periodically. Additionally, the DNR is working with the Great Lakes Basin States Association (Illinois, Indiana, Michigan, Minnesota, Pennsylvania, Wisconsin, Ohio, New York, and Ontario, Canada) to jointly develop an Oracle database known as RAPIDS (Regional Air Pollution Inventory Data System). Development of Air software later described in this plan will be incorporated in the RAPIDS development process.

Establish the Project Scope

Project Purpose

To establish electronic means of accepting air operating permit applications and air related construction permits electronically, and to provide the capability for applicants to check the status of all environmental permit applications through the Web.

Project Parameters

- Coordination with the BLIC project.
- Use of EDI, electronic legal documentation and security protocols in common with other State agencies.
- Assure confidentiality of propriety business information.
- Recognizing what can reasonably be accomplished by summer of 1998.
- Using project resources only for work elements not in the current agency budget and work plan.
- Continued involvement of established Air and EPD client advisory groups.
- Coordination with Linn and Polk county air programs. (Under general oversight of the DNR/EPA, Linn and Polk have delegated authority to directly manage their Air programs.)

Anticipated Solution Approach

Electronic Permit Application: Using Microsoft Visual Basic or similar software, an application would be developed which would enable the applicant, using a PC running Windows 95 or Windows NT, to prepare the application electronically. The application software could be downloaded over the internet or provided in the form of a floppy disk. This general approach applies to both Air Operating and Air Construction permits. The Environmental Protection division and their client contact (advisory) groups have already done considerable work toward designing effective paper forms. This effort can readily be incorporated in the design of electronic submission software.

Initially, the application would be submitted by sending a floppy disk or a CD-ROM to the DNR. At this time, the internet would not be used for submittal because of difficulty in sending large graphic files. However, the DNR intends to work toward using the internet for submission when technology improves to this point this is cost-effective.

Development of Air Operating Permit Software: Development of an Oracle database (RAPIDS), or "back-end" is underway. The DNR, under IowAccess, anticipates spending about $45,000 for a consultant-developer to write the "front-end" executable problem to be used by the applicant.

Development of Air Construction Permit Software: The general approach is similar to the Air Operating Permit area. A developer-consultant would be used to write the "front-end" executable program to be used by the applicant. In addition, it is necessary to write software to link the application data to the Oracle database. Estimated cost is $180,000.

Application Status Information: The DNR intends to develop a unified tracking system for all environmental permits. A database would be developed for maintaining permit application status information. Data elements might include the application receipt date, the name and E-mail address of the project lead, number of applications in the queue, current status, etc. Interested parties would access this information through DNR's home page on the Web.

A significant portion of this application, primarily the database, can be developed in-house. Available commercial software should be reviewed for suitability before attempting to develop the database in-house. Software will be necessary to link the Web to the status database. Modest consulting help may be necessary. Total development cost is initially estimated at $20,000, not including in-house efforts.

Customer Coordination: It is necessary to coordinate software development, and the IowAccess project, itself, with business and industry. The DNR intends to use current communication channels as much as possible. However, we expect it will be desirable to solicit input and feedback on application permit software design and tracking system data elements. Estimated cost $25,000.

Steps in the Process
See previous

Resources Needed to Proceed with Project
See previous

Broad Timeline for Project

Develop DNR Project Support Structure	**July 31, 1997**
Prepare Specific Project Statements for Consultant RFP's	**July 31, 1997**
Brief EPD Client Contact Group	**July 17, 1997**
Brief Business and Utilities Through Associations' Media	**August 15, 1997**
Issue RFP	**August 15, 1997**
Select Consultants	**October 1, 1997**
Complete Operating Permit Software	**January 15, 1998**
Test, Debug and Implement Operating Permits	**March 15, 1998**
Complete Construction Permit Software	**March 1, 1998**
Test, Debug and Implement Construction Permit	**May 1, 1998**
Review Sources for Possible "off the shelf" Tracking System	**August 15, 1997**
Select Tracking System Concept	**September 1, 1997**
Test and Debug Tracking System	**January 1, 1998**
Purchase and Install Tracking System Components	**November 1, 1997**
Implement Tracking System Reporting	**January 1, 1998**

Target Population

The Air Operating Permit initiative will affect approximately 300 of the largest Iowa businesses and utilities. Air Construction Permit applications impact about 1,800 businesses and utilities annually. Tracking system information will be useful for all business and utilities. Additionally, Iowa Citizens interested in environmental policy will be able to access tracking and accomplishment data on the Web.

Two counties, Linn and Polk, have delegated air permitting authority. The DNR has a duty to report relevant air data to the Environmental Protection Agency. These systems will be developed so that links to these counties and the EPA are fully supported.

DNR's strategy is to input both the Air data in an Oracle database, RAPIDS. This database is being developed jointly with states in the Great Lakes Basin States association. Standards are jointly agreed to, and module development is coordinated with other states. The development of software through IowAcess will be coordinated and shared with other states in the association.

Determine Project Goals

Goals

The DNR intends to respond positively to the needs of business and industry for timely issuance of environmental permits and concurrently insuring Iowa's citizens of a healthy environment which meets state and federal standards. The IowAccess project will be used as a primary element in improving environmental permitting systems.

Develop the Means of Evaluating the Project

Steering Committee/Citizen Council Evaluation

This portion of the evaluation will encompass three elements:

1. The project Plan, Budget, and Work Plan will be reviewed through the IowAccess process. Feedback will be incorporated in each project element.
2. Work Plans and Project Plans from each Project Team will be presented to citizens through business and utility associations and client-contact groups already established at the DNR. Feedback will be addressed by the Project Team.
3. As part of their Quarterly Reports, each Project Team will be required to submit an update on their project evaluation. This evaluation must involve citizens.

Internal Project Evaluation:

- Establish internal DNR project implementation team.
- Report progress monthly to DNR Director and IowAccess leadership.
- Document current paper-based work flow and communications. After project implementation, document new work flow and communications. Evaluate the differences in terms of staff time and attitude, and customer communications.

External Evaluation:
A written survey will sample attitudes and priorities of Title V and Construction Permit customers, including prime consultants and other environmental permitting areas. This survey as an opportunity to introduce them to the IowAcess project, and to establish a baseline for process improvement

The IowAccess project with focus on Environmental Permitting will be presented at monthly DNR client-contact meetings. Incorporate feedback as possible or necessary. A control group, a representative sample of consultants and businesses, will be used to test proposed system improvements.

Followup survey after implementation of the project asking a sample for their estimate of time and resources required with the electronic approach. Compare the two estimates to determine effectiveness.

Determine current staff and resources required to process applications using the current paper-based system. Measure staff and resources used after electronic permit application is started. Calculate difference and savings.

For application status component, use a survey after the system is implemented to ascertain the value, or lack thereof, to our customers.

Using the project team, compare Iowa's project with similar efforts by other states, i.e., Indiana.

Determine How the Project Team will Address Privacy and Security Issues in the Project Design

- Use recently acquired DNR Air Quality firewall in conjunction with the ITS's plan for security.
- Specifically devise policy and procedures to insure that propriety business information is protected from unauthorized disclosure.
- Coordinate with and utilize the authentication protocols being developed within the Electronic Commerce project.

Determine Approaches to Public Education About the Project

- Inform the Air customers through the existing DNR newsletter and an article in the "Iowa Conservationist.".
- Inform business and industry through association media and meetings.
- Brief customers regarding project status and anticipated benefits through the periodic information sessions conducted on the ICN.
- Involve the existing customer partnership teams.

- Use the DNR's Web presence to provide project information and status, with a link to the IowAccess home page.

Determine Project Benefits

This will be done concurrently with project evaluation. See also discussion under project evaluation.

Estimate productivity gains in permit systems, both by DNR and customers. Measure gains periodically after implementation.

Determine Possible Means of Sustainability of the Project

The DNR intends to expand this approach to other, similar environmental permitting systems. We expect an increase in staff efficiency. Thus, we expect to finance continuation and expansion by reallocation of internal resources. Ideally, our customer groups will experience similar cost reductions. We would ask their assistance in obtaining reasonable levels of State financial support or move toward direct fee-based support.

Environmental Permitting Work Plan

Activity	Date to be Accomplished	Responsible Entity
Brief DNR Client-Contact Group	7/17/97	Project Leads
Develop DNR Project Support Structure	7/18/97	DNR Director, Kuhn, Stokes and Clasen
Complete Project Budget and Work Plan	7/20/97	Project Leads
Establish Project Team Meeting Schedule	7/20/97	Project Leads
Prepare Project Scope for RFP's	7/31/97	Air Quality Staff, G. Welch, Lynn Hall
Prepare General Survey for Associations	7/31/97	Project Leads
Issue RFP's	8/15/97	Project Leads
Review "Tracking" Software Sources	8/15/97	DNR, Kathy Clasen Team
Select "Tracking" System Concept	9/1/97	DNR, EPD Mngt, Director, Kathy Clasen
Select Software Developer Consultants	10/1/97	IowAccess Lead, Project Leads
Prepare or update strategic plan for incorporating electronic technology in other DNR permitting areas	11/1/97	DNR, Director and Division Administrators
Procure "Tracking" System Software	11/1/97	DNR, Coordinate with IowAccess
Test & Debug "Tracking" System Software	1/1/98	DNR, EPD Staff and Mngt.
Complete Operating Permit Software	1/15/98	Consultant
Implement "Tracking" System Software	2/1/98	DNR, EPD Staff and Mngt.
Complete Construction Permit Software	3/1/98	Consultant, DNR Air Staff
Test, Debug and Implement Operating Software	3/15/98	Consultant, DNR Air Staff
Test, Debug & Implement Construction Software	5/1/98	Consultant, DNR Air Staff

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Project Budget

Project Element	Date	Amount
Air Operating Permit Executable Program, "Front-End" to be used by the customer to prepare Air Operating Permit applications. Cost of Developer-Consultant.	10/1/97	45,000
Air Construction Permit Executable Program, "Front'End to prepare permit applications, plus "translator" and links to "back-end" Oracle database system, Cost of Developer-Consultant	10/1/97	180,000
Purchase or Development of "Tracking" System Software	11/1/97	25,000
Customer Outreach, Testing and Review of "Front-Ends" and Tracking System elements. plus development of a "before" and "after" evaluation instrument.	1/1/98	20,000
Total		275,000