



IOWA DEPARTMENT OF NATURAL RESOURCES

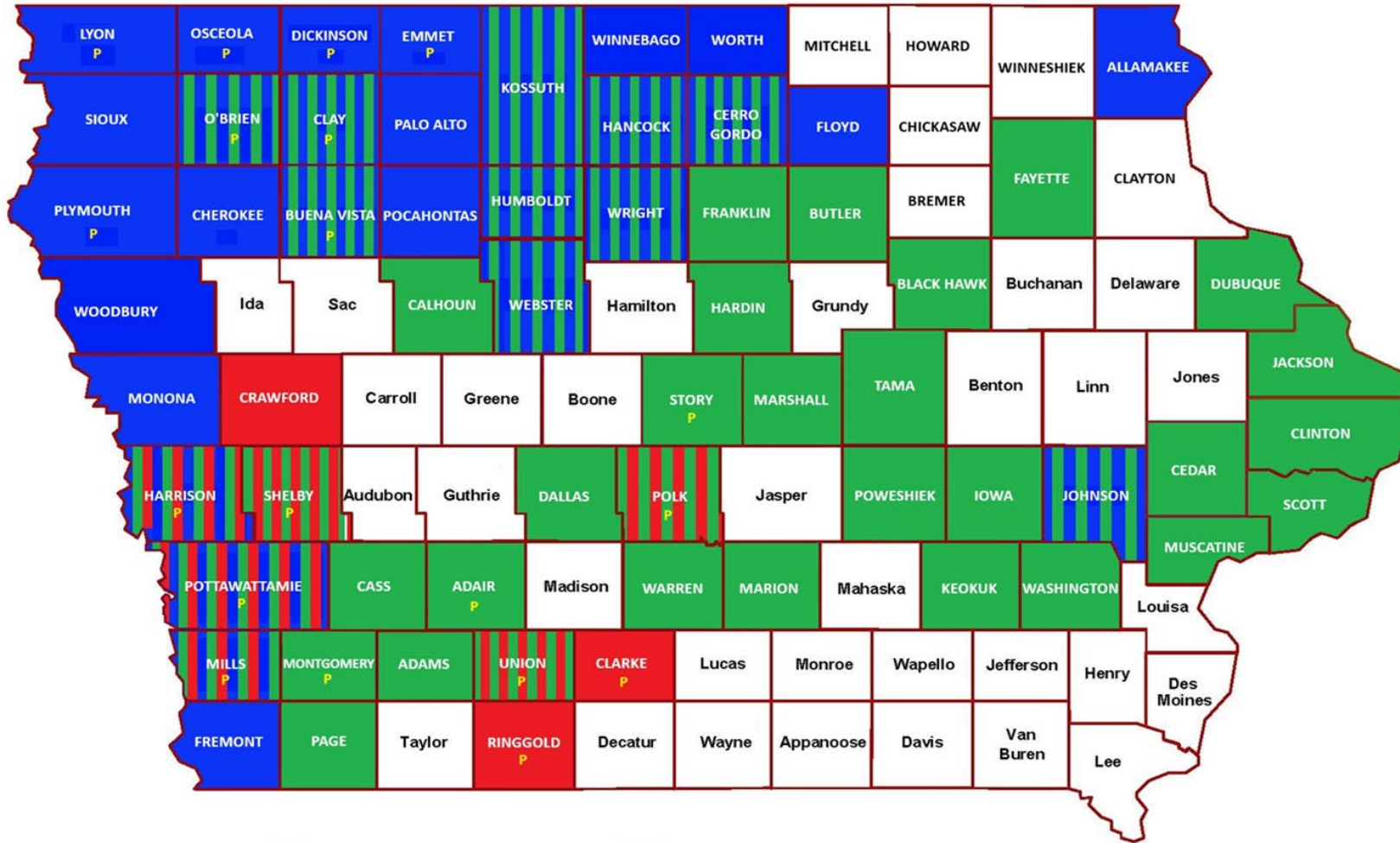
Leading Iowans in Caring For Our Natural Resources

Ed Tormey, ESD Division Administrator

2024 Natural Disaster Events

Ten separate natural disaster events hit Iowa in four consecutive months, impacting **62 counties**

2024 SPRING DISASTER DECLARATIONS



■ APRIL DISASTERS ■ JUNE DISASTERS
■ MAY DISASTERS P PRESIDENTIAL DISASTER DECLARATIONS

Spring 2024: Severe Storms, Tornadoes & Flooding



Photo credit: Des Moines NWS

Disaster Assistance and Recovery

April 2024 Tornadoes – Minden, Avoca and Greenfield

- 40 percent of Minden homes (pop. ~600) damaged or destroyed, and water supply facility was completely destroyed.
 - Iowa DNR worked with the city, Iowa Rural Water, and other agencies to quickly establish a temporary system for safe drinking water until a new facility is built.
- Greenfield – more than 150 homes damaged or destroyed
 - Iowa DNR provided debris management guidance, working closely with local, state and federal officials to assist clean-up.

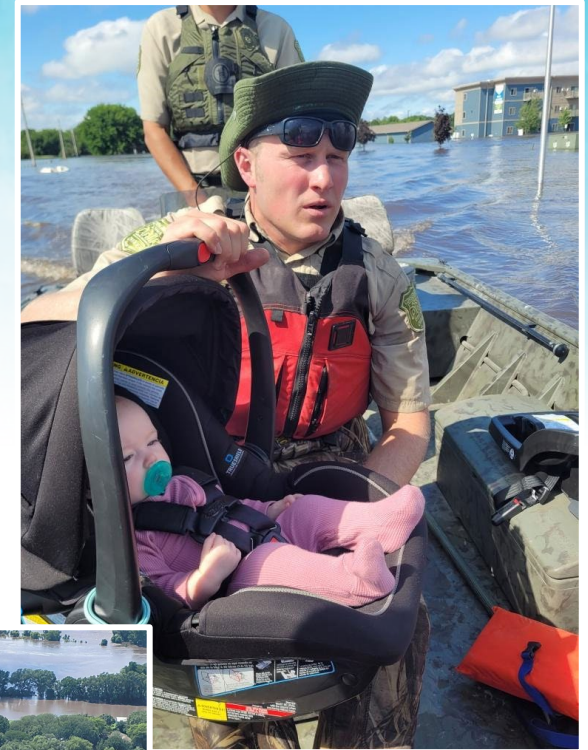


*Above: Greenfield
Left: Minden*

Disaster Assistance and Recovery

Northwest Iowa Flooding – June 2024

- **250 Iowans rescued from rising flood waters** by COs in Spencer, Rock Valley, Hawarden and Correctionville
- **34 drinking water supplies impacted**
- **88 wastewater facilities impacted**, ranging from bypasses to system failures; some still recovering
- DNR also provided engineering expertise and numerous other emergency response and assistance



Spencer – water rescue



Hawarden – flooding in June 2024





Disaster Assistance and Recovery

Debris, HHMs and Solid Waste Management During Disasters

- Disaster debris staging areas -- temporary solid waste transfer stations
- DNR Field Offices work with impacted communities to create and approve plans for efficient, fast, safe and responsible clean-up of solid waste
- Minimize long-term impacts to public health and the environment



Minden – HHM collection



Spencer – appliance debris staging area

Executive Order 10

Topics

- Moratorium
- Review entire volume
- Retrospective Analysis
- Rule Report
- Regulatory Analysis
- Rescind & Replace or Rescind – Notice of Intended Action

Moratorium

- Uniform application: February 1, 2023
- Lifts on a rolling basis: ends after EO10 review is complete for *that* chapter
- **EXCEPTION TO MORATORIUM:**
 - Reduce or remove a regulatory burden
 - Remove obsolete, outdated, redundant, or verbatim statutory language
 - Comply with a new law or court order
 - Prevent a threat to public health, peace, or safety
 - Reduce state spending

Review entire volume

- 567 --- 571 --- 561 --- 575
- Must review every chapter in a volume and evaluate: KEEP or DELETE
- Delete? → antiquated, unfunded, legal authority gone/changed/questionable, statute is self-enacting
- Keep?
 - What edits can be made?
 - Identify specific statutory authority for each rule

CALENDAR

- 2023 –
 - 567 (EPC): 1, 3, 9-35, and 65
 - 571 (NRC): 1,10, 12-35, 61, 91, 94, and 106
- 2024 –
 - 567: 38-93
 - 571: 36-74; various 92-116
 - 561 (Director): all
- 2025 –
 - 567: 2, 4-8 and 13, 100-213
 - 571: 2-8 and 11, 76-90; various 96-116
 - 575 (SPAB): all

Retrospective Analysis

- Cost-benefit analysis of current rule → *are the benefits of the rule actually being achieved AND do the benefits justify the cost?*
 - Are there cheaper, less burdensome alternatives to get the same result?
- Meet with stakeholders

Retrospective analysis, cont.

What is the intended benefit of the rule?

Is the benefit being achieved? Please provide evidence.

What are the costs incurred by the public to comply with the rule?

What are the costs to the agency or any other agency to implement/enforce the rule?

Do the costs justify the benefits achieved? Please explain.

Are there less restrictive alternatives to accomplish the benefit? YES NO

If YES, please list alternative(s) and provide analysis of less restrictive alternatives from other states, if applicable. If NO, please explain.

Retrospective analysis, cont.

METRICS

Total number of rules repealed:	
Proposed word count reduction after repeal and/or re-promulgation	
Proposed number of restrictive terms eliminated after repeal and/or re-promulgation	

Rule Report

- All Retrospective Analysis documents ~ defacto KEEP / DELETE LIST
- Due NLT Sept 1 of assigned year

Regulatory Analysis

- Regulatory Analysis forms – publish via Administrative Bulletin & on website
- Public comment period and public hearing
- Stakeholder support / neutrality on proposed new rules
- Submit for IGOV review
- Draft NOIAs before Commissions in November
- File by Dec 6; published Dec 27
- Proceed with normal rulemaking ~ RESCIND or RESCIND AND REPLACE
 - ONE DIFFERENCE: two public hearings

RECOMMENDATIONS

- Be aggressive with KEEP / DELETE review
- Consolidation
- Simplify language
- Identify statutory language
- Look at other states

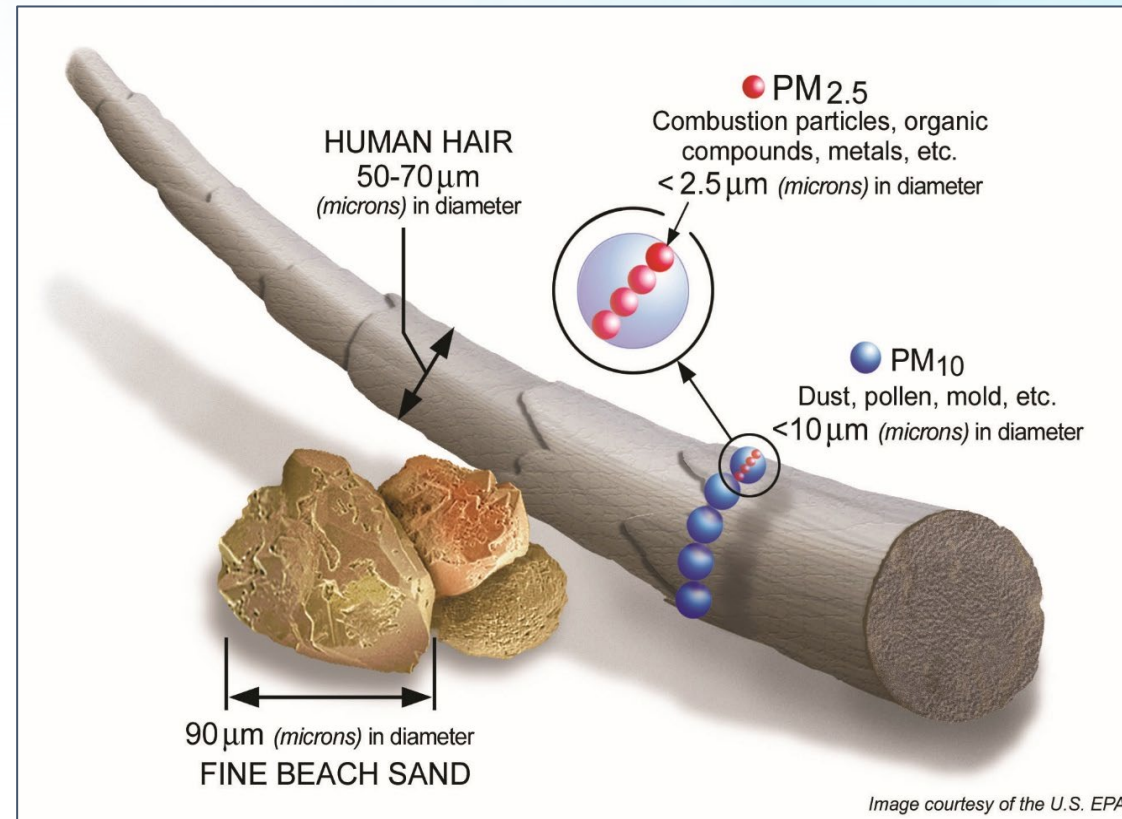
Metrics

- EO10 stats to date (all of 2023 and 2024 combined*), **approximately-->**
- 54 chapters
- 467 pages
- 3,571 restrictive terms
- 207,591 words

Air Quality Bureau Activities

PM2.5 NAAQS

- EPA strengthened the annual standard from 12.0 to 9.0 $\mu\text{g}/\text{m}^3$
- What's happening in Iowa?
 - Since May 2024: new standard applies to PSD projects major for PM2.5
 - Working through designations process:
 - Feb 2025: State recommendations sent to EPA using 2021-2023 DV
 - Feb 2026: EPA makes final designations using 2022-2024 DV
 - Next up:
 - Fall 2026: Convene stakeholder process to discuss emissions standards and exemptions
 - Feb 2027: State Infrastructure Plans due
 - Feb 2027: New PM2.5 standard applies to all permit projects in Iowa



Preliminary PM2.5 2022-2024 DV

- Preliminary results show PM2.5 concentration declines across the state
- Examples:

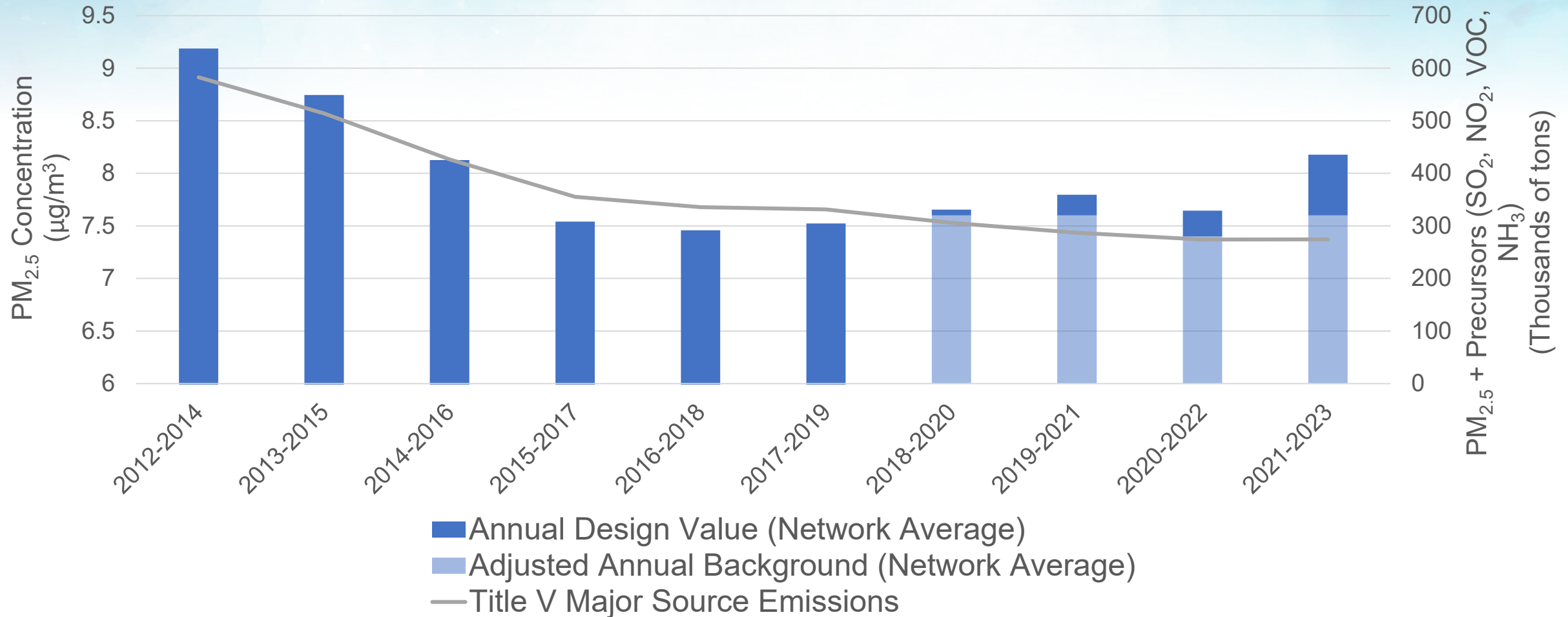
	2021-2023 DV ($\mu\text{g}/\text{m}^3$)		2022-2024 DV ($\mu\text{g}/\text{m}^3$)	
	24-hour	Annual	24-hour	Annual
Davenport, IA (Jefferson)	21	8.4	19	7.8
Des Moines, IA (Health Dept)	23	8.2	22	7.8
Council Bluffs, IA	25	8.7	23	8.4

Dispersion Modeling Revisions

- Finalized September 1, 2024
- Revisions include:
 - Modeling triggers on an averaging period basis for each pollutant
 - Use site-specific PM2.5 and PM10 backgrounds in modeling determinations
 - Cease evaluation of combined impacts on shared boundaries where access is precluded.
 - Develop site-specific background data annually that excludes influence of smoke events.

PM2.5 Background Concentrations

Method to Remove Smoke Events



Stakeholder Fee Discussions

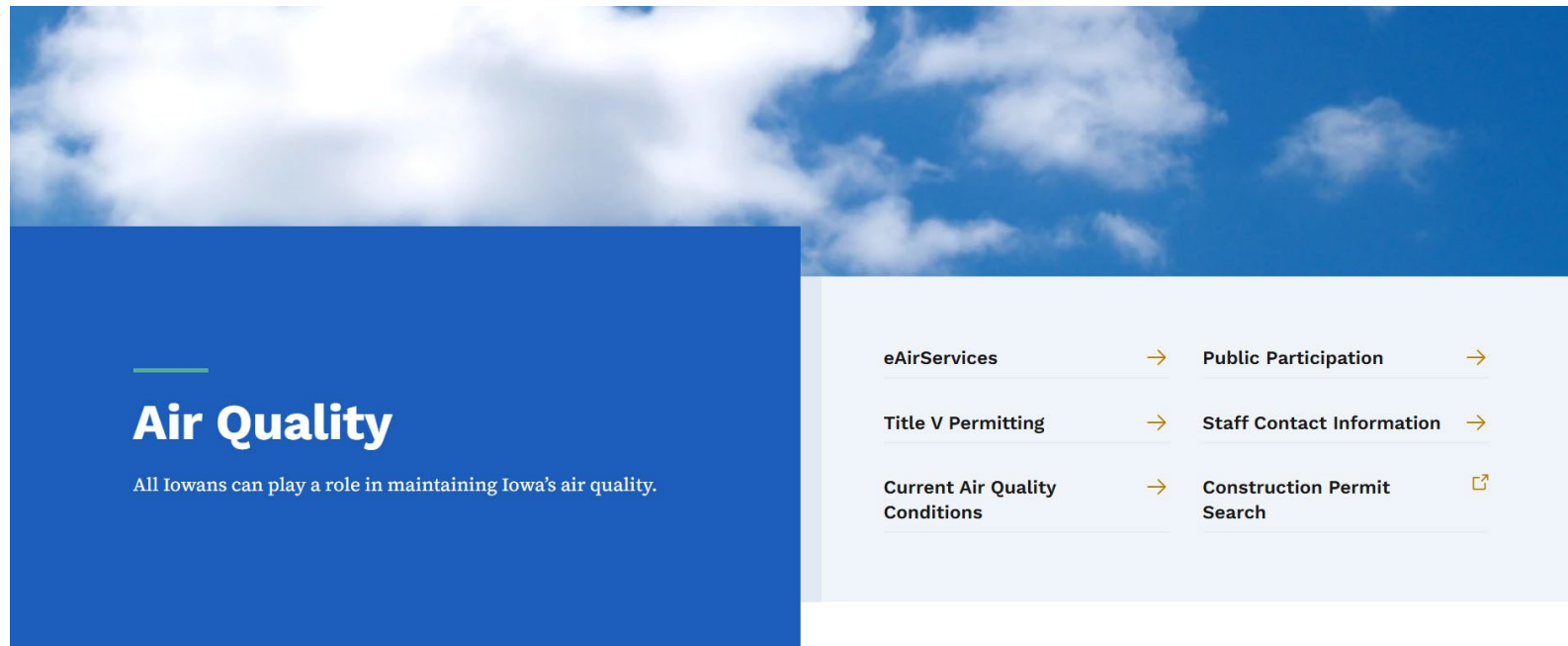
- Convened small stakeholder fee workgroup starting in June 2024
 - Review AQ budgets and expenses
 - Investigate revenue shortfalls in 3-5 year horizon
 - Determine potential fee options for the different accounts
- Three broad stakeholder meetings
 - One with minor sources only October 7th
 - All affected sources October 30th and December 10th
 - All comments received after meetings support raising fees
- Next step is administrative rulemaking
 - Ability to comment at multiple points
 - www.iowadnr.gov/environmental-protection/air-quality/public-participation

New Electronic Submittal Options Available

- AQRR - **Air Quality Records and Reporting**
 - Current Reports Accepted
 - Title V Annual Compliance Certifications
 - Title V Semi-Annual Monitoring Reports
 - National Emissions Standards for Hazardous Pollutants
 - New Source Performance Standards
 - Continuous Emissions Monitoring/Continuous Opacity Monitoring
- Portable Plant Relocation Notices
 - Submit to one email address to satisfy central and field office notification requirements

www.iowadnr.gov

- New DNR website went live on February 18, 2025.
- More streamlined and user-friendly experience for visitors.
- Redirects in place for many prior webpages, however recommend updating bookmarks as you view the pages.





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