

Improving Public Access to Iowa's Water Pollution Control Permits
Concept Paper
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Project Sponsor: Jeffery Vonk, Director, Iowa Department of Natural Resources
(Department)

Project Points-of-Contact: Angela Chen, Environmental Program Supervisor, 281-4736
Fran Amin, Information Technology Specialist, 281-7834

Goal: To provide increased public access to water pollution control permit information and to provide improved services to Iowa's local governments and industries

Project Purpose: The purpose of this project is to increase public access to water pollution control permit information. This will be accomplished by developing a web front end for an existing database which contains the permit data. Web access will be provided for two user groups – general public and permit holders. The general public will be able to review each permit and its supporting rationale. The permit holders would have the additional capabilities of submitting permit renewals and reviewing proposed permits online. This project will encourage the public to be more actively involved with regulating and protecting Iowa's waters, which is one of the goals outlined for the Environment in the Vilsack/Pederson Leadership Agenda.

Background: Department administers the National Pollutant Discharge Elimination System (NPDES) program under delegation from U.S. EPA. It is a program designed to regulate wastewater discharges into Iowa's water bodies through issuing and enforcing NPDES permits. By federal and state regulations, public involvement during permit development process is required and public access to permits is also required.

Currently, the most common way the public can get access to the permits or draft permits (permit on public notice and not yet finalized) is to visit the Department's Record Center located on the fifth floor of the Wallace State Office Building in Des Moines, Iowa. Alternatively, the public could call Department's permit writers or the Record Center, request the files to be copied at a cost to them, and send to them via mail. In either case costs to the public are incurred through traveling time or copy charges. In addition, access to this public information is slow and becomes an inconvenience.

By law, the public has 30 days from the date a draft permit is put on public notice to send any comments to the Department. The public notice is accomplished by publishing on a statewide newspaper for one day and post the notice at the business locations of the permitted discharge for 30 days. In some instances, the public still is not aware that a draft permit is on public notice.

The permitted facilities apply for permit renewals every five years. This is currently accomplished through the following steps:

1. The Department's permit writers pre-fill part of the application forms with existing data in the permit files and a custom built permit management database (called NPDS (National Pollutant Discharge System))
2. The Department sends a renewal notice with pre-filled application forms to the permitted facility (applicant)
3. The applicant completes the application forms on paper and submits to the Department

4. The Department's permit writers review the application forms for completeness and request missing information when needed.

Both the permit file review and public comment procedures are not efficient or convenient to the public. Due to the time sensitive nature of public notice and comment period, the public had requested to receive notification of public notices in addition to newspaper publication. Additionally, the public had requested web access to both the permit files and draft permits. However, due to lack of funding, these requests have not been fulfilled.

The permit renewal application manual process is time consuming for both the Department and the permit applicants. Because the applicants typically only work with the application forms every five years, the application forms submitted are often incomplete, even after the Department provided pages of instructions and conducted training sessions at regional meetings around the state. At least 10% of Department's permit writers' time is spent on requesting missing information from the applicants – this is time that could be better spent on drafting and finalizing permits, and providing technical assistance to the permitted facilities.

The Department is proposing to enhance web access to provide the following:

1. Web posting of all the existing NPDES permits. This would include generating the permit files electronically and converting them into read-only formats; scanning the permit pages that could not be generated electronically; saving each permit on a network server; linking to the website; and updating the web page at least once a week. This web front end will include a search function where the public can search by facility name or city or county. This page would also give a list of draft permits currently on public notice, and link to the draft permits and supporting fact sheets.
2. Web-based NPDES permit renewal applications. This would include developing a web front end, which will access Department's permit management database (called NPDS); pre-fill the application forms using data from NPDS database; accept data from applicants and save in a separate table/file for Department's review and acceptance into NPDS; check for data validity and completeness before accepting submittals; and provide online instructions and help functions to explain the fields on the application forms. This would also include setting up a security process for user identification and electronic signature acceptance according to EPA protocols. Once an applicant is authorized for electronic access, he/she would also be given access to a web page where he/she can review the proposed permit before it goes on public notice so that the Department and the applicant could resolve potential disagreement.

Request: \$15,000 for planning phase of this project

Deliverables: For the planning phase, the deliverables will include all the requirements gathering (from both department's employees and the public users), design and screen mockups, and statement of work. Also, during the planning phase, alternative approaches (such as off-the-shelf solutions vs. applications from other agencies) will be explored to seek the most cost effective method.

Cost Avoidance: Once the project is fully implemented, it is estimated that at least \$50,000 of tax money could be saved annually from reduced phone calls, copying and mailing; and from reducing the time permit writers work on incomplete application forms.

Project Funds: At this time, the Department of Natural Resource had secured grant money from U.S. EPA to update the NPDS data tables to match Iowa's One-Stop environmental database (web-based). The Department wishes to update the data tables at the same time the web-front for NPDES program is developed to improve the entire project's efficiency. Since EPA's grant only updates the database backend, the department intends to come back to the Council for additional funding to implement the web-application and posting portion of the project.

Interested Parties: Parties interested in this project include the following: Iowa's cities and businesses, Department of Natural Resources, environmental groups, citizens interested in knowing about and help regulating water pollutions in their areas.

At this time, the department intends to work with ITE to complete the work in the planning phase if ITE can complete the planning phase by March 31, 2006. If not, an outside consulting firm will be used.

Some of the Recipients of this Service: Iowa's cities and businesses; environmental groups, general public, and the Department of Natural Resources