

Program Review

of

Iowa Department of Natural Resources'
Air Permitting Programs

Conducted: July 2021 & November 2021

U.S. EPA, Region 7

Air Permitting and Standards Branch
Air and Radiation Division

Iowa Air Quality Bureau Permitting Program Review Report Contents

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IOWA DEPARTMENT OF NATURAL RESOURCES

AIR QUALITY BUREAU

AIR PERMITTING PROGRAMS

PROGRAM REVIEW REPORT

A. INTRODUCTION

The comprehensive review of the Iowa Department of Natural Resources' (IDNR's) air permitting programs was part of the U.S. Environmental Protection Agency Region 7's efforts to fulfill the EPA's oversight responsibility to ensure adequate implementation of the Clean Air Act (CAA). The overall scope of this review included assessment of the state agency's performance regarding: 1) Prevention of Significant Deterioration (PSD)/New Source Review (NSR) construction permitting including synthetic minor construction permitting, 2) Title V operating permitting, 3) New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) determinations, 4) the establishment of enforceable permit conditions, and 5) the collection and use of Title V operating permit fees. Although PSD permitting and Title V operating permitting were a component of this program review, these permitting programs are regularly reviewed as part of the routine oversight of IDNR's air permitting program and were not the primary focus of the permit file review. The focus of the file review was on synthetic minor construction permitting and the collection and use of Title V operating permit fees.

The review was initiated by a letter from the EPA to the IDNR dated April 12, 2021. In that letter, the EPA requested a list of construction permits issued by the IDNR over the previous three years. The EPA also requested that the IDNR complete two questionnaires, one for NSR and one for Title V. The EPA requested that the IDNR submit responses to both questionnaires prior to our review of the selected permitting files. We also requested that the IDNR complete Attachment C from the March 27, 2018, guidance "Program and Fee Evaluation Strategy and Guidance for 40 CFR Part 70." EPA Region 7 has historically conducted air permit program reviews at the office of the state under review, but due to the COVID-19 pandemic, this permit program review was conducted through video meetings and off-site review of electronic permitting documents. The majority of the documents that the EPA reviewed were available from the IDNR's website.

A program review entrance meeting was held virtually on July 14, 2021. Attachment E lists the attendees of the meeting. The EPA staff reviewed permit project files from approximately July 19 to July 30, 2021. The following EPA Region 7 staff participated in the review of the permitting files: Ward Burns, Bob Cheever, David Peter, Pat Scott and Bob Webber. A total of 46 construction permitting project files were reviewed regarding the above-mentioned actions

(see **Attachment A**). The EPA summarized our initial findings and provided the next steps associated with the review during a recurring monthly permit meeting between the IDNR and the EPA on August 17, 2021. Attachment F lists the attendees of that meeting. The EPA conducted a review of the Title V fee information in the months of October and November 2021. Kathy Finazzo coordinated the EPA's review of the IDNR's Title V fee information.

IDNR staff assisted the review team by ensuring access to the requested electronic permit files, providing financial information related to Title V fees and answering questions that arose from the review team during the review. The review team appreciates all of the assistance that IDNR staff provided during the permit program review.

B. SUMMARY of FINDINGS and CONCLUSIONS from PERMIT FILE REVIEW

The permit review team concluded that IDNR implements adequate construction and operating permit programs. In general, we found that the projects we reviewed were permitted appropriately. We made the following observations during our permit file review. These observations are in no particular order.

1. The following observations are related to the evaluation of the application:
 - a. IDNR appears to use appropriate emission factors when evaluating the increase in emissions from the project being evaluated.
 - b. IDNR appears to adequately document the source of the emission factors used as part of the permit application evaluation.
 - c. It appears that the NSPS and NESHAP applicability determinations that were made as part of the permitting actions that we reviewed were correct.
 - d. We reviewed the construction permitting records for evidence that the IDNR was considering the impact to air quality when issuing permits. 40 CFR §51.160(a) states: *“Each plan must set forth legally enforceable procedures that enable the State or local agency to determine whether the construction or modification of a facility, building, structure or installation, or combination of these will result in— (1) A violation of applicable portions of the control strategy; or (2) Interference with attainment or maintenance of a national standard in the State in which the proposed source (or modification) is located or in a neighboring State.”* EPA notes that IDNR developed a modeling guidance document that establishes which projects require a modeling analysis and how that modeling analysis is to be conducted. IDNR appears to conduct modeling analyses in accordance with its modeling guidance document as part of the construction permit application review process to ensure compliance with the National Ambient Air Quality Standards (NAAQS).

- e. IDNR recently implemented an online permit application titled Iowa EASY Air. The EPA recognizes that Iowa EASY Air has numerous benefits in relation to the permit application process. One significant benefit that IDNR identified in Question (A)(1) of the Title V Questionnaire is that the online application system has mandatory field entry and a completeness check which has all but eliminated incomplete applications. The EPA commends IDNR for undertaking the implementation of this online application system.
 - f. In response to the Title V Questionnaire Question (A)(6)(c), IDNR identifies several other benefits of the Iowa EASY Air online application system. These benefits include less data entry, accurate data, streamlined permitting process, online fee payment, saving time and resources, data sharing capabilities, and improvements to the emission inventory process. The EPA agrees that this system appears to have numerous benefits to both IDNR and the permittee.
 - g. In response to Title V Questionnaire question (I), the IDNR describes a “Trello” visualization board that is utilized to allow IDNR staff and management to quickly and easily track permit application status. IDNR identified several benefits from the use of this tracking system. EPA reviewed the tracking system and agrees that system provides many benefits. The EPA commends IDNR for implementing this permit tracking system.
2. The following observations are related to the development and use of technical support documents and other permit record documentation:
- a. In general, it appears that the Fact Sheets/Technical Support Documents that IDNR develops as part of the permitting action adequately explain the state's rationale for permitting and regulatory decisions, including NSPS and NESHAP applicability determinations.
 - b. IDNR appears to appropriately rely on and implement EPA guidance documents to determine the projects’ permit and air regulatory applicability.
 - c. It appears that the permitting record for the projects we reviewed include all of the relevant documents associated with the permitting action, including all relevant email correspondence.
 - d. IDNR provides access to permitting documents to the public. IDNR’s electronic records system, “DocDNA”, appears to include most of the relevant permitting documents associated with the facility. In addition to DocDNA, IDNR provides access to permitting documents on its construction and operating permits websites and the newly developed Iowa EASY Air. The combination of these resources

provides the public an inexpensive and quick resource to obtain air permitting documents related to permitted facilities.

3. The following observations are related to the permit contents:
 - a. The permits that we reviewed appeared to adequately identify the equipment that was being installed or modified.
 - b. The permits that we reviewed appeared to include the appropriate conditions to ensure that the limits were enforceable as a practical matter, including conditions to ensure ongoing compliance demonstration.
 - c. IDNR's construction permits appropriately include a condition that describes when construction must commence and when construction must be completed.
 - d. IDNR's construction permits appear to adequately describe what constitutes excess emissions and the appropriate actions the permittee must take if excess emissions occur.
 - e. It appears that construction permits receive an adequate amount of peer review.
 - f. For the permits that we reviewed, the averaging period of emission limits included in the permit appear to align with the averaging period of the NAAQS when appropriate.

4. The following observations are related to the permit issuance timeliness:
 - a. The permits we reviewed appeared to be issued in a timely manner, although there is no regulatory deadline for permit issuance of synthetic minor construction permits.
 - b. IDNR has a relatively small amount of "backlogged" Title V permits. EPA recognizes that IDNR made efforts beginning in 2014 to reduce the Title V permit backlog. The EPA also recognizes that staff turnover in the last year or so has resulted in a slight increase in the backlog over that period. However, since February 2021, IDNR's Title V permit program has been fully staffed and IDNR has indicated that it plans to reduce the backlog by over 50% in 2022.

5. The following observations are related to the permit staff training:
 - a. As discussed in Question (I)(B)(7) of the NSR Questionnaire, although IDNR indicated that they have little turnover, it appears that the agency has a robust training program for new employees. This robust training program would likely

decrease the time for a newly hired permit reviewer to begin reviewing and processing permit applications.

- b. The EPA recognizes the various activities that IDNR has undertaken to ensure continuous improvement in their Title V program including developing a defined training program for new employees and initiating several Kaizen and other process improvement activities. IDNR listed these activities in Question (A)(4) of Title V Questionnaire. EPA commends IDNR for undertaking these activities and encourages IDNR to continue these activities in the future.
6. The following observation is related to IDNR's coordination with EPA on PSD permit applications. IDNR adequately informs EPA of pending PSD permitting projects, including providing modeling analyses and permit applications prior to the permits being placed on public notice. Further, IDNR typically invites EPA staff to PSD pre-application meetings. EPA appreciates being informed of these projects early in the permitting process and believes that such coordination usually results in a more efficient permit issuance process.

EPA also made the following observations as part of this program review. These observations, in general, highlight potential areas of improvement and do not necessarily indicate program deficiencies.

1. The majority of the permits that EPA reviewed that included 12-month rolling limits didn't specify the consequences of exceeding the limit in the first months the limit applies (for example, the limit is exceeded in the 9th month after the limit is applicable). Although EPA believes that it would not be a compelling argument, an argument could be made that a violation couldn't possibly occur until the 12th month of operating under the limit, since one could argue that a full 12-month period is needed to compare to the 12-month rolling limit. The EPA recommends that IDNR consider including a statement in the permit that an exceedance at any point in the first 11 months that the limit applies would constitute a violation of the limit at the time that the limit is exceeded.
2. IDNR indicated in Question (II)(B)(3)(4) and (VI)(A)(1) that environmental justice issues are currently not generally considered in its permitting issuance process. We recognize that Iowa does not have any EJ legislation, policy, or general guidance related to permitting. We further recognize that IDNR interprets the Clean Air Act (Act) and their State Implementation Plan (SIP) to not address EJ in permitting actions. However, other states with similar SIPs have received comments alleging that a minor construction permit violated Title VI of the Civil Rights Act of 1964. Therefore, we encourage the IDNR to consider EJ issues and engage with communities as appropriate. Further, EPA R7 is aware of IDNR's interest in potentially utilizing EJ considerations in the future. To that extent, EPA encourages IDNR to consider potential EJ concerns in future permitting activities. IDNR did state that they work diligently to ensure their work is transparent to

the public. They have several ways the public can stay informed about proposed construction or Title V permit applications in their area. Iowa EASY Air does provide the public access to applications and issued permits. They also have a website that allows the public to search construction permits by criteria such as city or county and provides access to issued permits and applications under review. They have a similar site for Title V permits. Both provide the direct contact information for the staff member assigned to review the permit so the public can directly contact them for questions or submit comments. Also, IDNR recently released a new GIS-based method the public can use to search for active applications. The Environmental Services Dashboard allows the public to use a map tool to target areas of interest and display active construction and Title V permit applications in those areas along with a link to Iowa EASY Air to further view the application information. The dashboard also provides summary information for the public on the number of active applications by submission type and review status in the selected areas of interest.

In addition to their public permit information, the IDNR maintains a public participation website that lists all opportunities for the public to make recommendations on rulemakings and planning activities, including meetings and workgroups.

IDNR has also recently launched an environmental justice website that outlines IDNR's language and disability plans and reflect IDNR's commitment to serving Iowans of all backgrounds and cultures, including individuals with limited English proficiency and providing individuals with disabilities the opportunity for full participation in its programs, services, and activities. To further that effort the following language has recently been added to our air quality public notices:

“Individuals with disabilities or limited English proficiency are encouraged to participate in all DNR activities, including submitting public comments. If a reasonable accommodation or language services are needed to participate, contact the Air Quality Bureau staff member listed or Relay Iowa TTY Service at 800-735-7942 in advance to advise them of your specific needs. DNR's language access and disability nondiscrimination plans are available at <https://www.iowadnr.gov/About-DNR/Environmental-Justice>”

3. As part of this permit review, the EPA determined that IDNR appeared to appropriately identify all of the applicable requirements, including the applicable NSPS and NESHAP subparts, in the permitting actions that we reviewed. As part of our routine review of Title V permits proposed for issuance by IDNR, EPA also has determined that the IDNR, in general, identifies all of the appropriate applicable requirements. However, we do note that the level of detail of the applicable requirements in Title V permits has not necessarily been consistent from permit to permit, sometimes even for the same subpart. The EPA recognizes that there are several approaches to incorporating applicable requirements from an applicable subpart. On one end of the spectrum, the permit could

simply indicate the facility or affected source is subject to a certain subpart and refer the permittee to the Code of Federal Regulations. On the other end, the permit could include the entire subpart verbatim, with no identification of the specific paragraphs that apply to the affected source. The EPA recognizes that there are issues with both of these extreme approaches, as neither approach adequately informs the permittee or the public of the specific applicable requirements that the permittee is required to comply with. Typically, the most useful approach would be one that is a balance of these two extremes. The EPA recommends that IDNR work toward achieving consistency in how applicable requirements are included in the draft permit, especially for permits with affected sources subject to the same subpart. This approach would ensure that the permittee and the public are made aware of the applicable requirements in a clear and consistent manner.

4. IDNR has included the phrase “of the source category” when indicating that the facility is subject to certain NSPS and NESHAP subparts in Title V permits. IDNR staff have indicated in the past that the reason this phrase was used for certain subparts was because the IDNR has not adopted that federal rule and that they have no authority to determine whether the rule applies or doesn’t. Regardless of the rationale for the use of its phrase, the phrase leads to ambiguity on whether the rule actually applies or not. As stated at 567 IAC 22.108(1)(f), the Title V permit should clearly identify all applicable requirements. Should IDNR have any question whether a federal rule that IDNR has not adopted is applicable, IDNR should coordinate with EPA Region 7 for a determination such that the Title V permit will clearly identify whether the rule is applicable to the facility. In response to this observation, the IDNR stated that this language was discontinued in January 2013 and that any use of that language in any current Title V permit is an oversight.
5. During routine reviews of IDNR’s proposed draft Title V permits and follow-up discussions with IDNR staff, it is EPA’s understanding that the statement of basis or Title V permit writer notes typically only address changes that occurred since the previous Title V was issued (such as physical changes at the facility or changes in the applicable requirements). While this approach likely has benefits, such as highlighting the changes to the previous permit so that the focus of the review can be on those changes, it also doesn’t provide a complete summary of the rationale for all applicable requirement determinations for the facility. As Title V permits are generally renewed every five years, there is the likelihood that interested parties including the public and permitting staff from IDNR, EPA and the affected facility may not have been involved in the drafting and issuance of the previous Title V permit. Therefore, EPA recommends that the statement of basis or permit writer notes reference the previous statement of basis in some manner. A couple of options that EPA identified, but there are certainly others, include making the previous statement of basis part of the permitting record for the renewal permit or clearly indicate where the public or other entities can easily obtain the previous statement of basis.

6. In response to Title V Questionnaire question (E)(2), the IDNR stated that Title V permit modifications are not being prioritized primarily due to the fact that IDNR is not authorized to charge application fees for modifications. The EPA recognizes this challenge. However, Title V permit modifications often have significance to the permittee and the public. For example, 567 IAC 22.105(1)(a)(8) and 567 IAC 22.113(3) state in cases in which an existing Title V permit would prohibit such construction or change in operation, the owner or operator must obtain a Title V permit revision before commencing operation. Further 567 IAC 22.113(3) states that unless the director determines otherwise, review of significant Title V permit modification applications shall be completed within nine months of receipt of a complete application, which is consistent with 40 CFR 70.7(e)(4)(ii) which states that “the permitting authority shall design and implement this review process to complete review on the majority of significant permit modifications within 9 months after receipt of a complete application.” The EPA recommends that IDNR investigate opportunities to assess application fees for significant modification applications such that this potentially important component of the Title V permit program is fully implemented.

C. SUMMARY of FINDINGS and CONCLUSIONS for TITLE V FEE REVIEW

Section 502(b)(3)(A) of the Clean Air Act (Act) requires Title V operating permit programs to fund all “reasonable direct and indirect costs” of the permit programs through fees collected from Title V sources and requires the fees to be sufficient to cover all reasonable Title V permit program costs. 40 CFR §70.9(a) requires state Title V programs to collect fees sufficient to cover the permit program costs and “ensure that any fee required by this section will be used solely for permit program costs.”

In response to an EPA Office of Inspector General 2014 report, regarding the importance of enhanced EPA oversight of state, local, and tribal fee practices under Title V of the Act, the EPA issued a March 27, 2018 guidance titled “Program and Fee Evaluation Strategy Guidance for 40 CFR Part 70.” This guidance recommends the EPA seek internal assistance for fee evaluations from staff with governmental accounting, financial, or economics expertise, who work outside the Part 70 program. For this review, Kathy Finazzo from the EPA Region 7’s Resources and Financial Management Branch in the Mission Support Division provided assistance.

IDNR’s Title V permit program is funded by two sources – annual emission fees and hourly application fees. The current annual emissions fee is \$70 per ton for the first 4,000 tons of each regulated air pollutant. The current hourly application fee is \$100 per hour for initial Title V permits and Title V renewals. IDNR is currently not authorized to assess fees for Title V permit modifications. Annual emissions are reported to IDNR using SLEIS and fees received are tracked by IDNR using a Microsoft Access Database.

The Iowa fiscal year runs from July 1 to June 30. The EPA's presumptive Title V fee that applied during Iowa's 2020 fiscal year was \$52.03 per ton. The total emissions from Iowa sources during Iowa's 2020 fiscal year that were used for the presumptive fee calculation were 102,814 tons. Therefore, the presumptive minimum fee collection amount is calculated to be \$5,349,415 (102,814 tons x \$52.03/ton). Iowa actually collected \$12,388,558, which included a carryover from the previous fiscal year. Therefore, Iowa collected an amount greater than or equal to the presumptive fee required by the EPA and is therefore presumed to have adequate fees to fund the Title V program. Further, Iowa spent \$7,115,259 to fund the Title V program in FY 2020, which is less than the amount collected for FY 2020.

As is expected, the largest expense of IDNR's permit program is personnel cost. IDNR Title V permit writers work exclusively on Title V permits. Certain other IDNR staff, such as compliance, legal, field office, IT and program support, may also work on Title V-related issues. Personnel time spent working on Title V permits and other Title V permit activities is tracked in the Iowa EASY Air system. Application fee statements are sent to the facility based on the hours included in the Iowa EASY Air system. There are currently five Title V permit writers, two lead workers, and approximately one FTE shared by Linn and Polk counties.

Based on our review of IDNR's financial data, it does not appear that IDNR is using funds designated for Title V activities for any other purposes. Nor did it appear that IDNR uses non-Title V funds for Title V activities. However, EPA does recommend that IDNR ensure that the "Workday" Title V work tags are sufficiently descriptive to demonstrate that the activities and expenses being claimed for Title V activities actually qualify as valid Title V activities. IDNR believes the work tags combined with staff time use data provides IDNR with adequate information that the activity and expenses qualify as valid Title V activities.

In addition, the amount of regulated air emissions in Iowa that are covered under the emissions fee program are trending down. Therefore, Iowa informed the EPA that it is considering potential actions that it may need to take in response to this reduction to ensure that the Title V permit program is adequately funded.

In summary, the EPA did not observe any significant concerns with how IDNR is managing the Title V program in relation to the use of Title V fees and the ability for the state to adequately fund the Title V permit program at the current time.

D. SPECIFIC PERMIT FILE REVIEW FINDINGS

Staffing

The IDNR air permitting program is divided into two groups – Construction Permit Section and Operating Permits and Emissions Inventory Section.

Based on information provided by IDNR as part of the NSR Questionnaire, the Construction Permit Section has a total of 14 staff positions. This includes a one supervisor, five senior engineers, and nine engineers. The average length of NSR permitting experience is over 17 years.

Based on information provided by IDNR as part of the Title V Questionnaire, the Operating Permit and Emissions Inventory Section has a total of eight staff positions related to Title V permit development. This includes one supervisor, two senior environmental specialists, and five environmental specialists. The average length of operating permitting experience is over nine years.

Permit Project File Review

1. For AGP Eagle Grove project 17-314, it appears that the emission factors for certain units associated with the project are developed from stack testing. We recommend that, in future permitting actions, IDNR provide more detail in either the permit writer notes or the permit itself on the specific procedure from converting stack test results to an emission factor that will be used in compliance demonstrations.
2. For Flint Hills Menlo project 20-282, section 6 of permit indicates that a CEMS was not required by the permit. However, it appears that to demonstrate compliance with certain NOx limits, a CEMS is utilized.

ATTACHMENT A: List of Construction Permit Files Reviewed

Facility Name	Project ID	Location
3M	19-218	Knoxville
3M	19-268	Knoxville
3M	20-241	Knoxville
ADM Clinton Corn Processing	19-419	Clinton
Ag Processing, Inc. Eagle Grove	17-314	Eagle Grove
Ag Processing, Inc. Eagle Grove	19-040	Eagle Grove
Ag Processing, Inc. Sergeant Bluff	18-027	Sergeant Bluff
American Popcorn Company	18-492	Sioux City
Anamosa State Penitentiary - Iowa Prison Industries	18-406	Anamosa
Burke Corporation	18-490	Nevada
Cambrex Charles City, Inc.	19-006	Charles City
Cargill, Inc. - Sioux City	20-092	Sioux City
Cemstone Concrete Material	19-368	Northwood
CHI Health Mercy Council Bluffs	18-459	Council Bluffs
Climax Molybdenum Company	20-024	Fort Madison
City of Eagle Grove	18-119	Eagle Grove
Farmers Feed and Supply	19-197	Boyden
Fletcher Wood Products	19-338	Fort Dodge
Flint Hills Resources Menlo, LLC	20-282	Menlo
Grain Processing Corporation	18-269	Muscatine
Gregory Manufacturing	19-039	Fort Madison
Hawkeye Pedershaab Concrete Technologies, Inc.	18-397	Mediapolis
Karl Chevrolet of Stuart Collision Center	19-030	Stuart
Kent Nutrition Group	19-095	Sheldon
Kiliper Corporation	19-191	Ames
Lincolnway Energy	19-078	Nevada
Muscatine Water & Resource Recovery	19-383	Muscatine
NEW Corporative, Inc. - Cooper	20-281	Jefferson
Pella Corporation - Carroll Division	20-217	Carroll
Pella Corporation - Sioux Center Operations	20-063	Sioux Center
REG Ralston, LLC	20-034	Ralston
Responsible Transportation LLC	19-332	Sigourney
Sabre Towers and Poles	18-432	Sioux City
Seabee - Hampton Hydraulics	19-310	Hampton
Siouxland Energy Cooperative	19-278	Sioux Center
Smithfield Fresh Meats Corp.	18-302	Denison
TCC Materials	20-172	Muscatine

Facility Name	Project ID	Location
Tyson Fresh Meats, Inc.	20-208	Waterloo
University of Iowa - Oakdale Utility Power Plant	18-261	Coralville
University of Northern Iowa - Power Plant	19-429	Cedar Falls
University of Northern Iowa - Power Plant	18-273	Cedar Falls
City of Waterloo, Wastewater Treatment Plant	17-211	Waterloo
Wausau Supply Company	20-033	Stuart
Whirlpool Corporation - Amana Appliance Division	19-169	Amana
Whirlpool Corporation - Amana Appliance Division	20-021	Amana
Whirlpool Corporation - Amana Appliance Division	18-022	Amana

ATTACHMENT B: Completed NSR Questionnaire

Returned by IDNR prior to Audit.

[see the attached copy]

NSR Program Self-Evaluation Questionnaire

Last Updated: December 5, 2006

Instructions for completing the New Source Review (NSR) Permit Program Self-Evaluation Questionnaire

- When answering Yes or No questions, please add explanation as appropriate to clarify your response.
- This self-evaluation questionnaire does not address implementation of changes made to the federal major NSR rules in EPA's rulemaking on December 31, 2002 (as amended November 7, 2003)
- Please skip any sections of the self-evaluation questionnaire that do not apply within your permitting jurisdiction rather than answering hypothetically. For example, skip the nonattainment major NSR sections if you do not have any nonattainment areas.
- If you have a written policy or guidance document that substantially answers any question in this self-evaluation questionnaire, please so indicate and either attach a hardcopy to your response or point to a specific URL on your public web server where the document may be found.
- This self-evaluation questionnaire was developed by EPA Headquarters and Regions to assist in the agency's NSR oversight program. As part of its peer review process, EPA sought review and comment from STAPPA-ALAPCO. While this questionnaire has undergone a make-over from the original, the scope and detail of the questions asked remains the same for all agencies.

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I. Overview of New Source Review (NSR) Permitting Program

A. NSR Permits

1. Permit Tracking

- Y N 1. Do you have an established procedure for tracking synthetic minor permits?

If yes, please describe how your permits are being tracked (e.g., in an electronic database)

- Y N 2. Do you have an established procedure for tracking major NSR permits?

If yes, please describe how your permits are being tracked (e.g., in an electronic database)

2. Permit Issuance Rates

Note: 2020 was an abnormally slow year for permit issuance due to the global pandemic. In a more typical year, Iowa DNR reviews between 460 to 500 projects and issues between 1700 and 2200 permits annually.

1. How many PSD permits did you issue last year?

In 2020, Iowa DNR completed 16 PSD projects, issuing 152 permits in those projects. (Note: not all of these permits were PSD permits. A file review of each project would be necessary to identify how many permits were actually PSD permits)

- a. If none, when was the last PSD permit issued?

2. How many nonattainment major NSR permits did you issue last year?

None

- a. If none, when was the last nonattainment Major NSR permit issued?

Unknown, prior to the year 2000.

3. How many synthetic minor NSR permits did you issue last year?

Iowa DNR does not track synthetic minor and true minor permits separately. In 2020, Iowa DNR completed 356 non-PSD projects, issuing 1080 permits and making 27 determinations.

4. How many true minor NSR permits did you issue last year?

As stated in response to question #3 above, Iowa DNR does not track synthetic minor and true minor permits separately. In 2020, Iowa DNR completed 356 non-PSD projects, issuing 1080 permits and making 27 determinations.

5. How many “as built” NSR permits did you issue last year?

Iowa DNR does not track “as-built” projects specifically. These permits would be included in the total number of permits listed above.

6. Did you issue any waivers or variances allowing a source to commence construction prior to receiving a permit?

Y N

a. For any PSD projects? If so, how many?

Y N

b. For any major source non-attainment projects? If so, how many?

Y N

c. For any synthetic minor NSR projects? If so, how many?

Y N

d. For any true minor NSR projects? If so, how many?

7. What is the average time, in months, it takes you to issue the following types of permits, starting from the time the application was determined complete?

Note: Iowa DNR does not track a date when the application is deemed complete. All of the Construction Permit Section’s performance tracking metrics are calculated from the date the application is initially received to the date the permits are issued.

a. PSD permits

PSD permits are taking us approximately 100 days (1.3 months) on average to complete. This includes new major sources and major modifications at existing major sources.

b. Nonattainment major NSR permits?

NA, none have been issued.

c. Non-major/synthetic and minor permits?

Projects reviewed in this category are tracked in two different groups. Most (approximately 90%) of the projects in this category are what IDNR refers to as “standard” projects. The lead time for these “standard” projects averages approximately 40 days (1.3 months).

The remainder of the projects in this category are considered “other complex” projects and include:

- projects associated with SIP maintenance areas;
- projects associated with compliance or other legal issues;
- complex Title V synthetic minors;
- complex PSD synthetic minors;
- complex greenfield facilities;
- netting projects.

Other complex projects take us an average of 180 days or approximately 6 month to complete.

d. “As built” permits?

“As-built” projects are not currently tracked separately and are included in the reported lead times for the appropriate category reported above.

8. Please provide an Excel spreadsheet listing all of the NSR projects permitted in the three calendar years preceding the program review. For example, if the review takes place in 2007, include data for calendar years 2004, 2005, and 2006. To the extent available, include 1) the source name, 2) general location, 3) general description of project, 4) standard industrial classification code (SIC), 5) date application received, 6) date permit issued, 7) the type of permit issued, 8) any identification codes (e.g. AFS source number, project number, permit number) that facilitate retrieval of the permit record, and 9) any NSPS, NESHAP, or MACT subparts triggered by the project. Also identify all projects where the permit was issued after the project had already commenced construction.

Provided as attachment (Document titled Section I.A_ Question 2.8 permitting projects completed CY18-CY20).

3. *Effective Permit Writing*

Do your NSR permits:

- Y N 1. Identify each emissions unit regulated?
- Y N 2. Establish emissions standards or other operational limits that must be met, including appropriate averaging times for numeric limits?
- Y N 3. Include specific methods for determining compliance and excess emissions, including reporting, record keeping, monitoring, and testing requirements?
- Y N 4. Outline procedures necessary to maintain continuous compliance with emission limits?
- Y N 5. Establish specific, clear, concise, and enforceable permit conditions?
- Y N 6. Include conditions necessary for a source to avoid otherwise applicable requirements (e.g., keeping a modification “minor”)?

7. Describe the consequences, if any, for failing to meet any permit limit taken to avoid a substantive requirement (e.g. an emission cap taken to avoid PSD, a number-of-hours restriction to avoid more stringent BACT)?

If so, describe the nature of the permit condition and what those consequences might be.

The consequences of failing to meet a permit requirement depend on the requirement that is violated.

Y N

8. Establish the “enabling legislative” and “legal” basis to issue and enforce the conditions of the permit?

PERMIT ISSUANCE

Iowa Code section 455B.134 states that the director shall:

...

3. *Grant, modify, suspend, terminate, revoke, reissue, or deny permits for the construction or operation of new, modified, or existing air contaminant sources and for related control equipment subject to the rules adopted by the commission. The department shall furnish necessary application forms for such permits.*
- a. *No air contaminant source shall be installed, altered so that it significantly affects emissions, or placed in use unless a construction permit has been issued for the source.*
- b. *The condition of expected performance shall be reasonably detailed in the construction permit.*
- c. *All applications for permits shall be subject to such notice and public participation as may be provided by rule by the commission. Upon denial or limitation of a permit, the applicant shall be notified of such denial and informed of the reason or reasons therefor, and such applicant shall be entitled to a hearing before the commission.*

567 Iowa Administrative Code section states:

567—22.1(455B) Permits required for new or existing stationary sources.

22.1(1) Permit required. Unless exempted in subrule [22.1\(2\)](#) or to meet the parameters established in paragraph “c” of this subrule, no person shall construct, install, reconstruct or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, or permit pursuant to rule [567—22.8\(455B\)](#), or permits required pursuant to rules [567—22.4\(455B\)](#), [567—22.5\(455B\)](#), [567—31.3\(455B\)](#), and [567—33.3\(455B\)](#) as required in this subrule. A permit shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source or anaerobic lagoon.

22.1(3) Construction permits. The owner or operator of a new or modified stationary source shall apply for a construction permit.

567—22.3(455B) Issuing permits.

22.3(1) Stationary sources other than anaerobic lagoons. In no case shall a construction permit which results in an increase in emissions be issued to any facility which is in violation of any condition found in a permit involving PSD, NSPS, NESHAP or a provision of the Iowa state implementation plan. If the facility is in compliance with a schedule for correcting the violation and that schedule is contained in an order or permit condition, the department may consider issuance of a construction permit. A construction permit shall be issued when the director concludes that the preceding requirement has been met and:

- a. That the required plans and specifications represent equipment which reasonably can be expected to comply with all applicable emission standards, and
- b. That the expected emissions from the proposed source or modification in conjunction with all other emissions will not prevent the attainment or maintenance of the ambient air quality standards specified in 567—Chapter 28, and
- c. That the applicant has not relied on emission limits based on stack height that exceeds good engineering practice or any other dispersion techniques as defined in 567—subrule 23.1(6), and
- d. That the applicant has met all other applicable requirements.

22.3(2) Anaerobic lagoons. A construction permit for an industrial anaerobic lagoon shall be issued when the director concludes that the application for permit represents an approach to odor control that can reasonably be expected to comply with the criteria in 567—subrule 23.5(2). A construction permit for an animal feeding operation using an anaerobic lagoon shall be issued when the director concludes that the application has met the requirements of rule 567—65.15(455B).

22.3(3) Conditions of approval. A permit may be issued subject to conditions which shall be specified in writing. Such conditions may include but are not limited to emission limits, operating conditions, fuel specifications, compliance testing, continuous monitoring, and excess emission reporting.

- a. Each permit shall specify the date on which it becomes void if work on the installation for which it was issued has not been initiated.

- b. Each permit shall list the requirements for notifying the department of the dates of intended startup, start of construction and actual equipment startup. All notifications shall be in writing and include the following information:
 - (1) The date or dates required by 22.3(3)“b” for which the notice is being submitted.
 - (2) Facility name.
 - (3) Facility address.
 - (4) DNR facility number.
 - (5) DNR air construction permit number.
 - (6) The name or the number of the emission unit or units in the notification.
 - (7) The emission point number or numbers in the notification.
 - (8) The name and signature of a company official.
 - (9) The date the notification was signed.
- c. Each permit shall specify that no review has been undertaken on the various engineering aspects of the equipment other than the potential of the equipment for reducing air contaminant emissions.
- d. Rescinded IAB 3/18/15, effective 4/22/15.
- e. If changes in the final plans and specifications are proposed by the permittee after a construction permit has been issued, a supplemental permit shall be obtained.
- f. A permit is not transferable from one location to another or from one piece of equipment to another unless the equipment is portable. When portable equipment for which a permit has been issued is to be transferred from one location to another, the department shall be notified in writing at least 7 days prior to the transfer of the portable equipment to the new location. Written notification shall be submitted to the department through one of the following methods: electronic mail (email), mail delivery service (including U.S. Mail), hand delivery, facsimile (fax), or by electronic format specified by the department (at such time as an Internet-based submittal system or other, similar electronic submittal system becomes available). However, if the owner or operator is relocating the portable equipment to an area currently classified as nonattainment for ambient air quality standards or to an area under a maintenance plan for ambient air quality standards, the owner or operator shall notify the department at least 14 days prior to transferring the portable equipment to the new location. A list of nonattainment and maintenance areas may be obtained from the department, upon request, or on the department’s Internet website. The owner or operator will be notified by the department at least 10 days prior to the scheduled relocation if said relocation will prevent the attainment or maintenance of ambient air quality standards and thus require a more stringent emission standard and the installation of additional control equipment. In such a case, the owner or operator shall obtain a supplemental permit prior to the initiation of construction,

installation, or alteration of such additional control equipment.

- g. The issuance of a permit (approval to construct) shall not relieve any owner or operator of the responsibility to comply fully with applicable provisions of the state implementation plan and any other requirement under local, state or federal law.

ENFORCEMENT

Iowa Code section 455B.138 states:

Resolution of violations — appeal.

1. When the director has evidence that a violation of any provision of division II of this chapter or chapter 459, subchapter II, or rule, standard, or permit established or issued under division II or chapter 459, subchapter II, has occurred, the director shall notify the alleged violator and, by informal negotiation, attempt to resolve the problem. If the negotiations fail to resolve the problem within a reasonable period of time, the director shall issue an order directing the violator to prevent, abate, or control the emissions or air pollution involved. The order shall prescribe the date by which the violation shall cease and may prescribe timetables for necessary action to prevent, abate, or control the emissions of air pollution. The order may be appealed to the commission. The applicable time frames for the issuance and appeal of the order are defined in section 455B.110.
2. After the hearing on appeal, the commission may affirm, modify, or rescind the order of the director.
3. The director shall keep a complete record of the hearings and proceeding and the record shall be open to public inspection, subject to section 455B.137. Upon request, a copy of the transcript shall be furnished to the violator or alleged violator at the violator's or alleged violator's expense.
4. An appeal to the commission under this section shall be conducted as a contested case under chapter 17A.

Iowa Code section 455B.140 states:

Judicial review. Judicial review of actions of the commission or of the director may be sought in accordance with the terms of the Iowa administrative procedure Act, chapter 17A. Notwithstanding the terms of said Act, petitions for judicial review may be filed in the district court of the county in which the alleged offense was committed

Iowa Code section 455B.146 states:

Civil action for compliance — local program actions. If any order, permit, or rule of the department is being violated, the attorney general shall, at the request of the department or the director, institute a civil action in any district court for injunctive relief to prevent any further violation of the order, permit, or rule, or for the assessment of a civil penalty as determined by the court, not to exceed ten thousand dollars per day for each day such violation continues, or both such injunctive relief and civil penalty. Notwithstanding sections 331.302 and 331.307, a city or county which maintains air pollution control programs authorized by certificate of acceptance under this division may provide civil penalties consistent with the amount established for such penalties under this division.

Iowa Code section 455B.146A states:

Criminal action — penalties. 1. A person who knowingly violates any provision of division II of this chapter, any permit, rule, standard, or order issued under division II of this chapter, or any condition or limitation included in any permit issued under division II of this chapter, is guilty of an aggravated misdemeanor. A conviction for a violation is punishable by a fine of not more than ten thousand dollars for each day of violation or by imprisonment for not more than two years, or both. If the conviction is for a second or subsequent violation committed by a person under this section, however, the conviction is punishable by a fine of not more than twenty thousand dollars for each day of violation or by imprisonment for not more than four years, or by both.

4. *Project Discovery System*

As a permitting program matures, it should have a comprehensive system in place for informing potential applicants about the NSR permitting process and for assuring that the bulk of applicants obtain permits prior to construction. “As built” permits, for example, are an indicator of gaps in this discovery system.

1. What steps does your program take to inform sources of the need to obtain permits prior to commencing construction?

The Iowa DNR has developed relationships with both the Association of Business and Industry and Economic Development Authority and frequently works with those organizations to provide assistance and outreach to affected industrial categories and specific businesses. The Iowa DNR gives presentations at different business or industry association meetings. The Iowa DNR has also created a thorough website that discusses the need for air construction permits and has several fact sheets to assist facilities in determining which permits or requirements might apply. Additionally, the Air Quality Bureau maintains a toll-free construction permit assistance helpline to answer basic permitting questions and assist with

application completion.

The Iowa DNR has created a business liaison that assists applicants with all environmental permitting needs, including air quality. In addition, the Iowa DNR participates in those meetings by providing assistance to those companies that may need NSR permits.

Y N

2. Do you work with other agencies, for example economic development, zoning, or code departments to learn about the potential for new projects?

If so, please describe.

The Iowa DNR frequently works with the Iowa Economic Development Authority (IEDA) as they work with prospective businesses looking to locate in Iowa.

Y N

3. Do you act on other information you might gather through newspaper articles or other trade press announcements?

If so, please describe.

For prospective businesses, Construction Permitting staff will usually alert the DNR business liaison about the article and see if they can find a contact to reach out to the company to offer environmental permitting assistance. For companies that have already started or completed construction, the local DNR Field Office will usually be alerted so they can go on-site and provide compliance assistance and follow-up.

B. Staff and Training

1. What is the total number of staff dedicated to permitting for your NSR program? *Please provide an organizational chart.*

For questions 1 - 3 see organizational chart attachments.

2. For your NSR permitting program, please show a breakdown of staff by different job functions (e.g., number of modelers, review engineers, technicians, environmental scientists, clerical, supervisory, enforcement).

For questions 1 - 3 see organizational chart attachments.

3. Using the organizational chart provided above, please indicate the number of years of experience for each person involved with the NSR permitting program and summarize the total years of experience for your program.

For questions 1 - 3 see organizational chart attachments.

Y N

4. Does the department hire consultants or use other non-departmental staff to assist in permitting activities?

If yes, explain the scope of these activities including the types of projects reviewed, the fraction of time spent as a percentage of total resources dedicated to the state NSR program, the approximate cost to the department and whether these costs are recovered through permit fees.

- Y N 5. Does staff turnover affect the ability of the department to issue timely permits?

If so, does the department have any initiatives underway to reduce the level of turnover?

- Y N 6. Is the NSR program fully funded and staffed?

If not, please indicate the current level of staffing (e.g. 80% staffed with 16 of 20 positions filled).

7. Please describe your training program for new and existing staff that work on NSR permitting and issues. List any materials you use or training courses you try to attend.

For the new employee training, please see the document titled [Section I.B._Question 7_New Employee Training Checklist](#). Existing engineering employees are required to complete a minimum of five training classes each year. A five-year development plan is created for each employee taking into account their specific training needs and development goals. Also, see response to question V.1.9 regarding modeling.

8. Describe any additional training that you believe would be beneficial.

- Y N a. Would it be helpful if EPA provided more NSR training?

It would be helpful if EPA updated its existing training and provided training on additional topics, especially NSR applicability and NESHAP standards. See the document titled [Section I.B._Question 8.a_Additional Training](#) for more details on suggested training.

- Y N 9. Do you provide NSR program training opportunities for the public, including the regulated community?

If yes, please describe.

Annually, the Iowa DNR provides training to the public on a number of topics based on current needs, and this includes NSR training. Most recently Air Quality staff provided training on the Iowa Easy Air electronic application system (4 training sessions in the past two years) and used this training to provide training on the application process, including NSR topics.

The Iowa DNR also reviews recent NSR rule makings and guidance documents and decides if training is needed for the public. If it is determined it is necessary, the training will be provided either in person or as a webinar. The Air Quality Bureau also has a biannual client contact meeting. These meetings provide training on various permitting topics, including NSR. In these meetings the regulated community and the public are invited to attend via the Iowa DNR webpage and the AQ technical listserv (over 23,000 people). This is often a good opportunity to provide training on recent rule makings and guidance documents.

The Iowa DNR also develops a summary of important NSR topics or new guidance and provides the regulated community with a fact sheet on our website. These fact sheets contain staff contact information for further information on these topics.

The Iowa DNR also provides ongoing training through its permitting projects. Each project is an opportunity to teach the regulated community about NSR topics that are relevant in the project. In depth explanations of the concepts, relevant guidance, and rule requirements along with pertinent reference documents are provided as part of these projects.

C. NSR Implementation

- Y N
1. Do you implement EPA issued program guidance and policy for NSR?
- If not, please explain.
- Y N
2. Are you familiar with EPA's web-based NSR Policy & Guidance Database (<https://www.epa.gov/nsr/new-source-review-policy-and-guidance-document-index>) and do you use it? [NOTE: address updated by Iowa DNR]
- Y N
3. Does the department implement any NSR-related policies or guidance that deviate substantially from EPA's?
- a. If yes, do you seek peer review from staff, applicants, EPA and the public when developing the policy or guidance document?
- b. How do you make these documents available to staff, applicants, EPA, and the public?
4. In general, how do you learn about rule changes in the Federal NSR program?

DNR staff learn of rule changes through various mechanisms. These include, but are not limited to:

- Monthly calls between EPA staff and DNR staff,
- Federal Register notice emails,
- National Association of Clean Air Agency (NACAA) calls which are held typically monthly, and
- Central States Air Resource Agencies (CenSARA).

Y N

- a. Do you use EPA's website at <http://www.epa.gov/nsr/> to monitor NSR program changes and implementation issues?

D. Public Participation

1. What criteria are used to determine if a permit is public noticed?

Iowa DNR uses the criteria detailed in Iowa Administrative Code to determine if a permit is publicly noticed. This criteria is specified in Iowa Administrative Code at 567IAC33.3(17), 567IAC31.20(10), and 567IAC22.2(2).

2. Identify which of the following types of permits are noticed:

Y N

- a. PSD permits

Y N

- b. Major nonattainment NSR permits

Y N

- c. synthetic minor permits

NOTE: For proposed synthetic minor projects received by the Iowa DNR only the applications are posted to the Webpage for comment. All of the proposed synthetic minor projects are available for public inspection and comment which are directed to the applicable review engineer. A formal public review period is made available upon request from the public or other interested parties.

Y N

- d. minor permits

NOTE: For proposed minor projects received by the Iowa DNR only the applications are posted to the Webpage for comment. All of the proposed minor projects are available for public inspection and comment which are directed to the applicable review engineer. A formal public review period is made available upon request from the public or other interested parties.

Y N

3. Do you publish notices on draft NSR permits in a newspaper of general circulation?

The Iowa DNR publishes notices in a newspaper of general circulation in limited circumstances. These circumstances include draft NSR permits that affect NAAQS maintenance and nonattainment areas.

Y N

4. Do you use a state or other publication designed to give general public notice?

If yes, please describe.

EcoNewsWire Publication. EcoNewsWire is an electronic publication for Iowa DNR environmental topics that is provided to news outlets, interested subscribers and to social media outlets. In May of 2021, the EcoNewsWire Publication was sent to approximately 42,000 subscribers.

- Y N
5. Do you have procedures for notifying the public when major NSR permit applications are received?
- Yes, see attached public notice checklists used by the Iowa DNR to determine the necessary notifications as part of the NSR review process.
- Y N
6. Do you develop a mailing list of interested parties for NSR permit actions (e.g., public officials, concerned environmentalists, citizens)?
- Any interested parties may request to be added to the NSR mailing list. This request may be submitted to the Iowa DNR as a verbal, written or electronic communication request.
- Y N
7. Aside from methods described above, do you use other means for public notification?
- If yes, what are they (e.g., post notices on your webpage, email)?
- All proposed air construction permit applications (projects) received by the DNR are posted to the Webpage in numerous locations such as the public participation page (<https://www.iowadnr.gov/Environmental-Protection/Air-Quality/Public-Participation>). All proposed projects are available for public inspection and comment which are directed to the applicable review engineer. Other electronic means of communication are also utilized to inform the public such as email, AIR News, calendar of events and other notification methods if needed.
- Y N
8. Do your public notices clearly state when the public comment period begins and ends?
9. What is your opinion on the most effective ways to provide public notice?
- The Iowa DNR does not measure the effectiveness of its public notices or compare alternative methods, so there is no empirical information to provide.
- Y N
10. Do you provide notices in languages besides English?
- If yes, in which languages?
- Y N
11. Have you ever been asked by the public to extend a public comment period?
- If yes, did you grant the extension?

If not, please explain why you didn't grant the extension?

12. What percentage (approximately) of your major NSR permits are revised due to public comments?

The Iowa DNR does not track this metric. It is estimated that less than five percent are revised.

13. If a draft permit is revised, what criteria do you use to determine if a permit should be re-issued in draft?

The Iowa DNR uses the criteria detailed in Iowa Administrative Code to determine if a permit should be reissued as draft or may be issued as final. If the permit revision is not considered an administrative amendment as defined in 567 IAC 33.3(21) then the procedure defined in 567IAC33.3(17)"e" *Reopening of the public comment period* is followed.

567 IAC 33.3(17)"e" *Reopening of the public comment period*. If comments are submitted during the public comment period raise substantial new issues concerning the permit, the department may, at its discretion, take one or the following actions:

- (1) prepare a new draft permit, appropriately modified;
- (2) prepare revised fact sheet; prepare a revised fact sheet and reopen the public comment period; or reopen or extend the public comment period to provide interested parties an opportunity to comment on the comments submitted.

567 IAC 33.3(21) *Administrative amendments*. Upon request for an administrative amendment, the department may take final action on any such request and may incorporate the requested changes without providing notice to the public or to affected states, provided that the department designates any such permit revisions as having pursuant to subrule 33.3(21). "b" An administrative amendment is a permit revision that does the following:

- (1) Corrects typographical errors;
- (2) Corrects word processing errors;
- (3) Identifies a change in name, address or telephone number of any person identified in the permit or provides similar minor administrative change at the source; or
- (4) allows for a change in ownership or operational control of a source where the department determines that no other change in the permit is necessary, provided a written agreement that contains a specific date for transfer of the permit responsibility, coverage, and liability between the current permittee and the new permittee has been submitted to the department.

14. What type of comments or other concerns trigger a public hearing?

If requested by the public or interested parties, the Iowa DNR will provide the opportunity for a public hearing. This information is provided as part of the public notification process.

15. How are public hearings noticed?

Notification of public hearing is provided to the public through electronic notification on Iowa DNR website, EcoNewsWire, email, Iowa Events calendar or by certified letter if electronic means are not available. All notifications of proposed public hearing are provided to all interested parties.

a. How much notice is given?

As specified in Iowa Administrative Code, 567IAC33.3(17)(5), 30 day notification is provided prior to the proposed public hearing date.

16. What is your process for the public to obtain permit-related information (such as permit applications, draft permits, deviation reports, monitoring reports) especially during the public comment period?

All information on the project and draft permits is available in the affected areas, such as at the local library, on the Iowa DNR website, and EASY Air application portal. Compliance reports and other facility records are available on the Iowa DNR electronic records system (DOCDNA) or through the public records center.

Y N

17. Do you have a website for the public to get permit-related documents?

If yes, please answer the following:

a. What is available online?

b. How often is the website updated?

c. Is there information on how the public can be involved?

Y N

18. Do you provide training to citizens on public participation in NSR?

If yes, approximately how many training opportunities have been provided in the last five years?

19. How do you notify affected States (including tribes) of draft major source permits?

The Iowa DNR sends an email notification or by certified letter if electronic means are not available.

Y N

20. Do public notices for PSD permits specifically state the amount of increment consumed?

Y N

21. Are public notices for PSD permits sent to each party identified in 40 CFR 51.166(q)(2)(iv)?

E. Program Benefits

- Y N 1. In your opinion, is the NSR program (both PSD and nonattainment Major NSR) an incentive to reduce emissions below major source levels?
- In some circumstances it is. For example, if a business has a long range business plan that does not include any significant changes in operation or increases in volume, the facility may install additional controls to remain a minor source.
- Y N 2. In your opinion, have NSR permits been used as the authority to implement other priorities such as toxic emission reductions and improved monitoring and reporting?
- NSR permitting has not been used as the authority to implement other priorities beyond ensuring that permits contain practicably enforceable limits as to comply with applicable Clean Air Act regulations.
- Y N 3. In your opinion, does the case-by-case nature of a NSR permit allow you to implement emission reducing programs or controls more quickly than rulemaking?
- Y N 4. In your opinion, does the NSR program provide communities a mechanism to be involved in improving their own air quality?
- Y N 5. In your opinion, has the PSD program contributed to sustaining good air quality?
- It not only sustains good air quality but assures that as better emission reduction methods are developed and adopted by some, that other similar projects must meet those standards also.
- Y N 6. In your opinion, have the nonattainment Major NSR requirements contributed to reducing emissions or avoiding emissions increases in nonattainment areas?

II. Major NSR Permitting

a.

A. Applicability

1. Stationary Source Determinations

- Y N 1. Do your SIP-approved rules define stationary source differently than 40 CFR 51.165 or 51.166?
- If yes, please explain.

- Y N 2. When determining if emissions units are contiguous or adjacent, do you assess whether emissions units under common ownership or control may be a single stationary source regardless of the distance between the emissions units?
- If yes, please explain.
See “Single Source Discussion” after Question 4 for a complete discussion.
- Y N 3. Do you assess facilities’ financial, personnel, and contractual relationships to determine common ownership or control?
- Y N 4. Do you assess whether sources with different first two-digit SIC codes (*i.e.*, emissions units not in the same industrial grouping) may qualify as separate stationary sources?

Single Source Discussion:

DNR conducts a case-by-case analysis in those situations where the single source status comes into question for NSR, Title V, and/or NESHAP. The analysis considers all criteria (*i.e.* common control, SIC Code, contiguous/adjacent). In addition, all relevant and current EPA rules and guidance is used as part of the determination. Finally, in order to maintain consistency in determinations, one senior engineer signs off on all single source determinations.

When there is a question regarding the single source status, the process followed is:

- (1) A Single Source Questionnaire is sent to the company or companies in question. A copy of the Single Source Questionnaire is labeled “Section II.A._Questions 1-4_Single Source Questionnaire”.
- (2) Once the Single Source Questionnaire is returned it is reviewed by an engineer.
- (3) The engineer drafts a determination using the single source memo template. A copy of the template is attached as “Section II.A._Questions 1-4_single source memo template”.
- (4) The draft determination is sent to the senior engineer for approval. There could be some discussion between the senior engineer and the permit writer.
- (5) The company/companies are notified once the determination is approved.

The questionnaire is updated after new rules and guidance has been issued by EPA and there are no outstanding legal actions.

It should be noted that past single source determinations are not reevaluated based on new guidance unless circumstances/operating conditions have changed that would result in a reevaluation.

2. PTE Calculations

1. How do you determine if emissions factors (e.g., AP-42) are acceptable for NSR applicability purposes?

The Iowa DNR often uses emission factors to make emission estimates because it may be the best source of information available. In all cases, the Construction Permit staff reviews the emission factors and assesses the appropriateness of the emission factor for the application. The Iowa DNR understands even the best emission factor is an average of the considered source tests.

This assessment is made by understanding the limitations in the emission factors. This is accomplished by reviewing the information associated with the emissions factor. For AP-42, this includes reading the associated section for the source category. The data used to develop the emission factor is also reviewed along with any supplemental information provided (background documents). Specifically, the things considered are:

- Is the emission factor representative of the emission unit being evaluated?
- What is the emission factor's rating/ranking?
- How many tests were done to develop the emission factor?
- What is the quality of the data collected (appropriate test methods done, testing conditions etc.)?
- What is the age of the data?
- Were the source test data taken from many randomly chosen facilities in the industry population?
- Is the source category population for the emission unit specific or broad?
- What is the variability in sources tested and in emissions from the unit itself?
- Were the operating parameters evaluated and similar to the current case? If not, how will they affect the emissions?

The appropriateness for the application is assessed based on a review of these factors.

Additional data, testing done at the site or in the state on similar units, or information obtained from the manufacturer is often used to back up an emission factor if it is determined that the emission factor is of insufficient quality or not specific enough for the studied case. Material balance or other engineering estimates may be performed. In addition, if the data is not of sufficient quality or specific enough, a compliance margin is added to the emission factor or additional testing is required.

In addition, the use of the emission factor often depends on how close the estimate is to an emission limitation or threshold. If the data shows it is well below all applicable standards and thresholds it may be of enough quality to use for the project. If the estimates are close, additional data or stack testing would generally be required.

- Y N 2. Does the department routinely require sources to document whether emissions factors are appropriate and representative of emissions from the actual emission unit being permitted?

If yes, how is this information documented in the permit record.
If no, please explain why such documentation is not made.

The Iowa DNR routinely requires sources to document whether factors are appropriate and representative of emissions from the actual emission unit being permitted. This information is then reviewed as part of our project review using the procedures described in the previous question. A detailed discussion on the use of any emission factors (source, appropriateness, quality/limitations, derivation, etc.) is provided, as well as whether additional testing is required for validation, in the project engineering evaluation, which is required for each permit issued.

- Y N 3. Do you include PM₁₀ condensible emissions in the total amount of PM₁₀ emissions when determining NSR applicability, BACT/LAER evaluations, PSD increment consumption, and compliance with the NAAQS?

- Y N a. When PM₁₀ testing is required do you include a permit condition that requires testing and specifies testing methods for PM₁₀ condensibles?

3. Fugitive Emissions

1. Please provide your regulatory definition of “fugitive” emissions for major NSR applicability purposes.

Per 567 IAC 33.3(1) Definitions, “Fugitive emissions” means those emissions which could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening.

- Y N 2. Do you make a distinction between “fugitive” emissions and “uncontrolled” emissions?

If yes, please explain.

As defined in the Iowa Construction Permit Manual, page 5-13, “Uncontrolled emissions” are emitted while operating at the maximum design capacity and absent any federally enforceable operating restrictions. This means the unit is operating 8,760 hours per year without any control equipment.

- Y N 3. Do you include fugitive emissions in major NSR applicability determinations for new sources?

For PSD applicability determinations, fugitive emissions are included if the source belongs to one of the the 28 listed source categories or source categories subject to an NSPS or NESHAP promulgated prior to August 7, 1980, per 567 IAC 33.3(1), definition of a “Major source”, paragraph “3”. Once a pollutant triggers PSD, all emissions are subject to BACT and ambient air review.

- Y N a. For modified sources?

Existing PSD major sources include fugitive emissions for PSD applicability determinations, per 567 IAC 33.3(1), definitions of “baseline actual emissions” paragraph 1(a) and 2(a), and the definition of “projected actual emissions” paragraph 2. i.e., “The average rate shall include fugitive emissions to the extent quantifiable and emissions associated with startups, shutdowns, and malfunctions”

- Y N 4. Do you allow major sources to use reductions in fugitive emissions for netting purposes?

If yes, please describe how you determine the fugitive emissions “baseline” used for netting.

If allowed, it relies on the company having sufficient documentation available to calculate previous actual emissions [for example, several silt loading tests in conjunction with records of vehicle miles traveled (VMT)].

5. Please provide a description of your guidelines or calculation methodology used to quantify fugitive emissions.

If there is a standard calculation method, such as AP-42 for estimating haul road emissions, or EPA’s Protocol for Equipment Leak Emission Estimates (EPA-453/R-95-017) that is used, otherwise engineering judgement.

- Y N 6. Do your permits contain conditions for fugitive emissions consistent with requirements for BACT/LAER (i.e., specific emission limits, control methods, and/or work practice standards)?

4. *Debottlenecking/Increased Utilization*

- Y N 1. When determining if proposed modifications are subject to major NSR, do you include emissions increases from existing emissions units that are not physically modified (i.e., units that will be debottlenecked or have increased utilization such as boilers)?

2. What method is used to determine the emissions increase from these emissions units?

Any emissions increase that is a result of the project is included in the NSR determination. This includes unmodified units, debottlenecked units, and increased utilization.

- a. What EPA guidance do you consider for this issue?

EPA NSR database for debottlenecked sources
<https://www.epa.gov/nsr/debottlenecked-sources>, and the 1990 draft NSR workshop manual.

- Y N 3. Do you train your permitting staff to include such emissions increases when determining if a modification is major for NSR?

5. Netting

- Y N 1. Is netting approved in your NSR SIP for determining whether modifications at major stationary sources are subject to major NSR (PSD or nonattainment Major NSR, as applicable)?

If not, please explain.

2. What is the contemporaneous time period for netting in your SIP?

As defined in 567 IAC Chapters 31 (567 IAC 31.3(1)) and 33 (567 IAC 33.3(1)), "Net emissions increase" is 5 years before construction on the particular change commences and forward in time to the date that the increase from the particular change occurs.

- Y N 3. For determining the baseline from which emission reductions are calculated, do you require the applicant to submit the actual emissions from the units along with any permit limits that apply?

- Y N 4. Do you allow an applicant to receive emission reduction netting credit for reducing allowable emissions instead of actual emissions?

If yes, please explain.

- Y N 5. Do you allow an applicant to receive emission reduction credit for reducing any portion of actual emissions that resulted because the source was operating out of compliance?

If yes, please explain.

- Y N 6. Do you allow an applicant to receive emission reduction credit for an emissions unit that has not been constructed or operated?

If yes, please explain.

- Y N 7. Are emissions reductions to meet MACT requirements eligible for netting credits?
- If yes, under what conditions? (See EPA's November 12, 1997 memo from John Seitz entitled "Crediting of Maximum Achievable Control Technology (MACT) Emission Reductions for New Source Review (NSR) Netting and Offsets".)
- Y N 8. When any emissions decreases are claimed as part of a proposed modification, do you require that all stationary, source-wide, creditable and contemporaneous emissions increases and decreases of the pollutant be included in the major NSR applicability determination?
- If not, please explain.
9. To avoid "double counting" of emissions reductions, what process do you use to determine if emissions reductions considered for netting have already been relied upon in issuing a major NSR permit for the source?
- The Iowa DNR conducts a complete facility review to determine if emission reductions have been relied upon in issuing a NSR permit.
- Y N 10. Do you have a process to track projects that use credits to net out of major NSR?
- If yes, please explain.
- Y N 11. Do you require that emissions reductions (e.g., reductions from unit shutdowns) must be enforceable to be creditable for netting?
- If not, please explain.
- Y N 12. Have you had public concerns regarding the netting analysis and procedures used for any issued permits that avoided major NSR?
- If yes, please describe.
- Y N 13. Do you allow inter-pollutant trading when netting (e.g., allow a source to use NO_x or PM credits for netting out of VOC increases)?
- If yes, please explain.
14. What process do you have to verify that a source's emissions reductions considered for netting, including emissions reductions that may have been "banked," are not already used by the source, or another source, as nonattainment Major NSR offsets?
- The Iowa DNR conducts a complete facility review to determine if emission reductions have been relied upon in issuing a NSR permit.

B. Prevention of Significant Deterioration (PSD) Permitting

1. BACT Determinations

- Y N 1. Do you require permit applicants to use the “top-down” method for determining BACT?
- If no, what approach do you require?

- Y N 2. Do you commonly use information resources other than the RACT/BACT/LAER Clearinghouse to identify control options, costs, etc.?
- If yes, what resources do you commonly use and rate the usefulness of each one?

The RACT/BACT/LAER Clearinghouse (RBLC) has several issues which limits the reliability and usefulness of the information contained within the RBLC. These issues are well known by all agencies, including EPA, so they will not be discussed here. Due to these issues, the DNR staff have to use other resources which include:

- (a) Internet research of process equipment and control equipment used around the world,
- (b) Vendor information on control equipment (technical specifications and cost),
- (c) Review of permits from other states (both major and minor), and
- (d) Discussion with other regulatory agencies, including other countries.

The usefulness of each of these depends on the project and the type of the equipment. For example, when permitting was done for the nitrogen fertilizer plants, vendor information and internet research was the best source since there hadn't been a new fertilizer plant in the US in about 30 years. On the other hand equipment such as coal-fired boilers, Selective Catalytic Reduction (SCR), etc. are more common so discussion with other agencies and internet review can provide all of the necessary information.

- Y N 3. Do you provide a detailed documentation/explanation of draft BACT determinations in the public record?

- Y N 4. In your public record for draft BACT determinations, do you provide an economic rationale if a BACT option is rejected as being prohibitively expensive?

5. What procedures do you use to calculate baseline emission rates for calculation of cost effectiveness values?

The Iowa DNR guidelines instruct applicants to determine baseline emissions by calculating the upper bound uncontrolled emissions which is based on EPA's October 1990 Draft New Source Review Workshop Manual. The DNR recommends an applicant use one of the following methods for calculating emissions:

- (a) Continuous emissions monitoring system (CEMS)
- (b) A stack test
- (c) Material or mass balance
- (d) Emission limits and test data from EPA documents, including background information documents for New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), and Section 111d standards
- (e) Emission factors from technical literature
- (f) Information from comparable sources
- (g) EPA or State approved emission factors
- (h) Vendor supplied emission factors or emissions data
- (i) Engineering estimation.

The applicant is required to submit supporting documentation regardless of the method used.

- a. What do you view as "uncontrolled" emissions?

Uncontrolled emissions for the purpose of a BACT review are emissions emitted without consideration of the application of control equipment, NSPS/NESHAP requirements, or other controls necessary to comply with State or local regulations.

However, inherently lower polluting processes and inherent physical or operational controls can also be considered with appropriate documentation. Examples include a natural gas boiler considering only natural gas combustion or a painting process only using low VOC paints.

- Y N 6. Do you consider combinations of controls when identifying and ranking BACT options (e.g., low organic solvent coatings plus thermal oxidation)?

7. Do you ever re-group the emissions units included in a cost evaluation in either of the following ways?

- Y N a. If an applicant's approach is to evaluate the cost of controlling each unit separately, do you ever consider combining units for control by one control device?

Y N

b. If an applicant combines all units for control by one control device and concludes this approach is too expensive, do you ever consider controlling individual units or a small group of units that have the greatest percentage of total emissions?

Y N

8. Do your PSD permits specify emissions limits and control methods consistent with the basis (and capabilities) of the selected BACT options?
9. How do you establish the compliance averaging times for BACT emissions limits?

BACT averaging times are established on a case-by-case basis. The following is an excerpt from the Iowa Air Quality Bureau Construction Permitting Manual:

“An averaging time is critical for an emission limit. Without a specified averaging time the listed number is merely an emission rate. For example, 1.5 lb/hr does **not** have an hourly or instantaneous averaging time unless such an averaging period is assigned to it. Without an averaging time an emission limit is not enforceable as a practical matter.

The purpose of the averaging time is to match the limit to the impact (e.g., SO₂ emissions to health impacts) or to ensure compliance. EPA has stated in guidance that it wants potential violations to be frequent enough to deter noncompliance. EPA believes that one violation a year (such as a ton per calendar year limit) is not enough. Once per month is the minimum considered effective by EPA. Therefore, the form of the limit, including the averaging time must result in at least potential monthly violations.¹

Various factors weigh in favor of allowing a long term rolling average such as historically unpredictable emissions. Other factors may weigh in favor of a shorter term limit such as the inability to set interim limits during the first year or no ability to continuously track emissions. The engineer must make a determination as to what monitoring and averaging period is warranted for the particular emission unit/emission point in light of how close the allowable emissions would be to the applicability threshold.²

EPA has several policy memos that state determinations allowing an annual rolling average versus a shorter term limit must be made on a case-by-case basis. Those memos are:

- “*Guidance on Limiting Potential to Emit*,” June 29, 1992,
- “*Use of Long Term Rolling Averages to Limit Potential to Emit*,” from John Rasic to David Kee, February 24, 1992, and

¹ This policy was explained in a March 13, 1987 memo from John Seitz to Bruce Miller of Region IV.

² “*Guidance on Enforceability Requirements for Limiting Potential to Emit through SIP and §112 Rules and General Permits*,” Kathie A. Stein; January 25, 1995.

- “Policy Determination on Limiting Potential to Emit for Koch Refining Company Clean Fuels Project,” from John B. Rasnic to David Kee, March 13, 1992.”

- Y N 10. Do you make sure that permit conditions impose restrictions consistent with BACT evaluation assumptions? (e.g., if the annual emissions used in a BACT cost evaluation are based on an assumption of less than continuous operation and/or operation at less than maximum capacity, do permit conditions contain limits based on the assumption used?)

2. BACT Cost Evaluations

- Y N 1. Do you allow deviation from EPA’s recommended cost evaluation procedures?

If yes, please explain.

2. Do you place primary reliance on total or incremental cost effectiveness values?

The Iowa DNR primarily relies on total cost effectiveness.

- a. If you give greatest (or equal) weight to incremental costs, what is your basis for doing so?

3. Do you place primary reliance on a comparative cost approach or a “bright line” test?

A comparative cost approach looking at previous determinations.

- Y N 4. If you place greatest importance on a comparative cost approach, do you try to obtain cost data for projects outside your permitting jurisdiction?

5. If you use what can be described as a “bright line” test, what is the basis of your “bright line” cost effectiveness value and do you change the value over time to account for inflation?

- Y N 6. Do you use a different cost approach for different pollutants?

If yes, please explain.

The Iowa DNR considers a different cost effectiveness value for greenhouse gas (GHG) emissions than what is used for criteria pollutants.

7. Under what circumstances do you conduct a BACT cost evaluation independent of the cost evaluation provided by the applicant? (An independent evaluation could entail obtaining additional vendor quotes.)

If the Iowa DNR requires additional documentation (such as vendor quotes), a request is made for the company provide the additional documentation. Examples of these types of requests include, but are limited to:

- An applicant's cost evaluation relies the Office of Air Quality Planning and Standards (OAQPS) Cost Control Manual or other such documents instead of actual vendor quotes
- The estimated cost per ton of pollutant removed is on the upper end of what the Iowa DNR considers economically feasible, based on previous determinations.

- Y N 8. Are cost estimates required to be referenced to a common base year (e.g., 1998) so that cost estimates can be easily compared?
- Y N 9. Are other agencies contacted to determine if their cost estimates need to be normalized before comparisons can be made?
- Y N 10. Do you perform a BACT assessment for all new/modified emissions units or activities emitting a pollutant subject to PSD review, no matter how small the emissions from an affected unit or activity?
- Y N 11. Do you consider increases or decreases in corollary toxic/hazardous air pollutants as part of a BACT evaluation? [This question addresses implementation of EPA's "North County Resource Recovery Remand" memo dated September 22, 1987.]

If yes, please give a specific example.

The Iowa DNR does not have a specific example from the last five years, but in the past, the Iowa DNR has asked companies to look at specific alternative controls, or choose between two alternatives that have similar cost and technological effectiveness, but different environmental impacts.

- Y N 12. Do you provide BACT evaluation training to new (or newly-assigned) new source review (NSR) permitting staff (other than on-the-job training)?

If yes, describe the nature of the training provided.

Several of the Construction Permitting staff have attended a class (BACT Workshop) in the past, but based on an online search it does not appear this class is available as a standalone class any longer.

- Y N 13. Do you provide BACT evaluation refresher training to experienced NSR permitting staff?
- If yes, how frequently do you provide this training and what is the nature of the training provided?
- As noted above the BACT Workshop class does not appear to be available as a standalone class, but is part of the various NSR classes available. Staff are encouraged to take training classes as they become available.*
- Y N 14. Do you provide an information outreach program on BACT evaluations for owners of regulated sources?
- If yes, how frequently do you provide such information and how do you provide it?
- Y N 15. Do you provide an information outreach program on BACT evaluations to the public?
- If yes, how frequently do you provide such information and how do you provide it?
- Y N 16. Do you enter each BACT determination in the RACT/BACT/LAER Clearinghouse?
- Y N 17. Before establishing BACT as work practice, design, or operational standards, do you determine that emissions limits (e.g., lbs/mmBTU, lbs/hr) are not feasible?
- If no, please explain.
- Y N 18. Do you apply BACT to fugitive emissions?
- If no, please explain.

3. *Additional Impacts (soils, vegetation, visibility, growth)*

- Y N 1. Do your PSD application forms specifically require information regarding additional impacts?
- If yes, include a copy of the forms.
- Y N 2. If no, do you require applicants to submit sufficient information necessary to complete an additional impact analysis?

3. What resources do you use for researching additional impacts?

The Iowa DNR expects applicants to conduct a document search as part of the evaluation and the Iowa DNR staff reviews the references provided. The Iowa DNR has a tool for evaluating the impact on soils and vegetation that is based on the following documents from EPA:

- "A Screening Procedure for the Impacts of Air Pollution Sources on Plants, Soils, and Animals"
- "Air Quality Criteria for Oxides of Nitrogen"

The Iowa DNR also provides a tool that automates the level 2 screening procedures described in the VISCREEN manual. All of these references and tools are available on the Iowa DNR website at <https://www.iowadnr.gov/Environmental-Protection/Air-Quality/Modeling/Dispersion-Modeling>

Y N 4. Do you include environmental justice issues in your analysis?

Y N 5. Has an additional impact analysis in the last 5 years been a cause for concern in an issuance of a PSD permit?

If yes, please explain.

Y N 6. Do you generally allow arguments that the protection of the NAAQS will assure protection of vegetation?

If yes, please explain.

Sometimes applicants will state this in the report, but arguments that protection of the NAAQS will assure protection of vegetation alone is not sufficient.

Y N 7. Do you require that predicted short-term impacts (e.g., one hour NOx impacts) be used to assess impacts on vegetation for pollutants which do not have short term ambient standards?

If no, please explain.

This is included in the Iowa DNR's Soils and Vegetation tool, available on the Iowa DNR website here at <https://www.iowadnr.gov/Environmental-Protection/Air-Quality/Modeling/Dispersion-Modeling>

Y N 8. Regarding visibility impacts, do you require assessments for vistas (e.g., parks, airports) near the proposed source or modification?

If no, please explain.

The Iowa DNR typically picks the nearest airport and state park and ask applicants to evaluate those. More could be selected if there are a large number in the area.

4. Preconstruction Monitoring

- Y N 1. Do you have formal preconstruction monitoring requirements?

The requirements are described in Iowa DNR's PSD Modeling Guidelines and require applicants to use either existing data (with justification) or establish site-specific monitoring network. The guidelines are available on the Iowa DNR website at <https://www.iowadnr.gov/Environmental-Protection/Air-Quality/Modeling/Dispersion-Modeling>

- Y N 2. Do you have a formal public participation process regarding requirements for preconstruction monitoring for specific proposed projects?

This would be part of the public comment period for the project.

- Y N 3. Have you ever consulted with the Federal Land Manager (FLM) regarding preconstruction monitoring requirements for a proposed source or modification?

Generally no, due to the State of Iowa's distance from surrounding Class I areas, but the FLMs were contacted the last time the Iowa DNR received an application for a new coal-fired power plant (NOTE: this facility was never permitted)

- Y N 4. In the last five years have you ever required an applicant applying for a PSD permit to conduct preconstruction ambient monitoring or meteorological monitoring?

- Y N 5. Do you have a formal approval/denial process at the conclusion of preconstruction monitoring?

Not at this time. A process would be developed on a case by case basis if preconstruction monitoring was required.

- Y N 6. Do you have a formal process during preconstruction monitoring for resolving conflicts between the FLM and the applicant?

If yes, please explain.

- Y N 7. Do you routinely provide ambient monitoring data in lieu of requiring applicants to perform preconstruction monitoring?

If yes, please briefly describe the monitoring network used and the basis for the monitoring value selected.

Refer to the Background Concentration TSD, available here:

<https://www.iowadnr.gov/Environmental-Protection/Air-Quality/Modeling/Dispersion-Modeling/Background-Data>

- Y N
8. Do you follow EPA guidance (e.g., siting, equipment, data validation, audits) regarding collection of preconstruction monitoring data?
9. Under what circumstances would you require post construction ambient monitoring as a condition of a PSD permit?

A determination regarding post-construction monitoring is made by the permit writer on a case-by-case basis. The Iowa DNR's "Air Dispersion Modeling Guidelines for PSD Projects" states:

EPA's *Ambient Monitoring Guidelines for Prevention of Significant Deterioration* (May 1987), recommends post construction monitoring be done when there is a valid reason, such as when predicted concentrations are close to the NAAQS and when there are uncertainties in the data modeled. A decision by permitting staff to require post-construction monitoring would be made after the PSD application has been thoroughly reviewed.

The document can be found at <https://www.iowadnr.gov/Environmental-Protection/Air-Quality/Modeling/Dispersion-Modeling#249516-psd-modeling-guidance>.

The Iowa DNR has not required post-construction monitoring in the last five years. In the past post-construction monitoring has been required if there were no monitors from the existing monitoring network nearby and/or the predicted concentrations were close to the NAAQS.

C. Nonattainment Major NSR Permitting

The State of Iowa currently has one non-attainment area located in Muscatine, Iowa for the 1-hr SO₂ standard. The Iowa DNR has not conducted a major nonattainment NSR permitting project since 2000. Therefore, the Iowa DNR does not have contemporaneous information regarding these questions at this time.

1. Offsets

- Y N
1. Do you have an emissions "bank" for offsets?
- If no, go directly to 10.
- Y N
2. Is the bank a database used for emissions trading?
- If yes, please explain how the trading works.
- Y N
3. Do you, as the reviewing authority, control the trading of credits in the "bank"?
- If no, who controls the trading?

- Y N 4. Are the credits certified “creditable” (including surplus for attainment planning purposes and other Clean Air Act requirements) by you at time of entry into the bank?
- Y N 5. Are the credits evaluated and certified “creditable” (including currently surplus) at the time of withdrawal and use?
- If not, please explain.
6. How long are the “offsets” valid from time of reduction?
- Y N 7. Are the banked credits included in the attainment demonstration and inventory as “real emissions” (*i.e.*, emissions being emitted into the air)?
- Y N 8. Are the banked credits used for NSR offsets only?
- If not, what are the other uses?
- Y N 9. Are the banked credits discounted with time?
- If yes, please explain the discounting procedures.
10. How do you determine that the reductions being used are properly included in the attainment demonstration?
- Y N 11. Are the emissions reductions available for NSR offsets only allowed from the same nonattainment area as the proposed source or modification?
- If not, please explain.
12. What procedures do you use to determine the baseline to quantify the reductions?
- a. How do you quantify the amount of creditable reduction?
- Y N 13. Are the records for determining actual emissions available for review by you?
- Y N 14. Are copies of permits required as part of the permit application to determine if the reductions from other sources being proposed as NSR offsets are federally enforceable?
15. How do you verify that the reductions proposed for NSR offsets are “surplus” to other Clean Air Act requirements and are “real,” (*i.e.*, reductions in emissions that were actually emitted into the air)?
16. What process do you use to verify that the reductions were not used in a previously issued permit?

- Y N 17. Do you allow inter-pollutant trading for NSR offsets?
If yes, please describe this trading procedure (e.g., pollutants allowed, ratio of reductions required, eligibility criteria, etc.).
- Y N 18. For serious and severe ozone nonattainment areas do you allow “internal offsets” instead of lowest achievable emissions rate (LAER)?
If yes, what is the offset ratio?
- Y N 19. Do you allow credits used for netting to be used as nonattainment Major NSR offsets?
- Y N 20. Do your nonattainment Major NSR rules require the offset ratios prescribed in the Clean Air Act?
If no, please explain what other ratios are used?
- Y N 21. Do you require that applicants proposing to use NSR offsets include a “net air quality benefit” modeling analysis as part of their permit application?
If yes, please describe what information is required.

2. LAER Determinations

- Y N 1. Do you require permit applicants to use a top-down approach to determine the most stringent control option available for LAER?
If not, what approach do you require?
- Y N 2. Do you require a permit applicant to identify all available control options?
If yes, do you require the applicant to identify control options as being:
- Y N a. Achieved in practice?
- Y N b. Contained within the SIP of any other state or local reviewing authority?
- Y N c. Technologically feasible?
- Y N d. Cost effective?
- Y N 3. Do you use information sources other than the RACT/BACT/LAER Clearinghouse to identify control options?
If yes, please describe what information sources you commonly use and the usefulness of each?
4. Please describe under what circumstances you would conduct a LAER analysis independent of the analysis conducted by the permit applicant.

- Y N 5. Do you submit your LAER determinations to the EPA's RACT/BACT/LAER Clearinghouse?
- Y N 6. Do you consider technology transfer in your LAER determinations?
7. If you consider cost effectiveness in LAER determinations, please describe the procedures used. (For example, describe the procedures used to calculate the baseline emission rate in the cost effectiveness determination.) For each criteria pollutant, provide the dollar/ton threshold used to determine whether a control option is cost effective (and state whether this is total or incremental cost).
- Y N 8. Do you use a different cost approach for different pollutants?
- If yes, please explain.
- Y N 9. Do you provide detailed documentation or explanations of proposed LAER determinations in the technical support document (TSD) or public record?
- Y N 10. Do you provide an economic rationale in the TSD or public record if a LAER option is rejected as being prohibitively expensive?
- Y N 11. Do you consider combinations of controls when identifying and ranking LAER options?
- Y N 12. Do you perform a LAER assessment for all new/modified emission units or activities emitting a nonattainment pollutant subject to major NSR review no matter how small the emissions from an affected unit or activity?
13. Please describe how your LAER analysis includes "time of" considerations? (For example, if a new or modified source had constructed without a permit and at a later time went through nonattainment Major NSR review, would you consider LAER at the time of permit issuance or at the time of emission unit construction/ modification?)
- Y N 14. Do your permits contain conditions requiring specific emission limits/ control method conditions/work practice standards consistent with the basis (and capabilities) of the selected LAER option?
15. Please describe how you establish compliance averaging times for LAER emission limits.
- Y N 16. Do your permits contain conditions requiring emissions testing, monitoring, recordkeeping, and reporting so that inspectors and enforcement personnel can easily determine compliance with LAER requirements?
- If not, please explain.

- Y N 17. Do you ensure that permit conditions impose restrictions consistent with the LAER determination? (For example, if emissions used in the LAER determination are based on an assumption of less than continuous operation and/or operation at less than maximum capacity, do permit conditions contain limits/restrictions based on the assumptions used?)
18. Please describe how you incorporate public comments into your LAER determinations.
- Y N 19. Do you provide LAER evaluation training to new (or newly-assigned) NSR permitting staff other than on-the-job training?
- If yes, please describe the nature of the training provided.
- Y N 20. Do you provide LAER evaluation refresher training to experienced NSR permitting staff?
- If yes, how frequently do you provide this training and what is the nature of the training provided?
- Y N 21. Do you provide an information outreach program on LAER evaluations for owners or operators of regulated sources?
- If yes, how frequently do you provide such information and how do you provide it?
- Y N 22. Do you provide an information outreach program on LAER evaluations to the general public?
- If yes, how frequently do you provide such information and how do you provide it?

3. *Alternatives Analysis*

- Y N 1. Does each nonattainment Major NSR permit action address the alternatives analysis as required by section 173(a)(5) of the Clean Air Act?
- Y N If yes, is this alternatives analysis a specific requirement of your nonattainment Major NSR rules?
- Y N 2. Do you have criteria that would address the depth of analysis required for a specific project?
- Y N 3. Do you include project-specific environmental justice issues that are raised as part of this analysis?
- Y N 4. Do you know of any projects where this analysis resulted in changes to proposed projects?
- If yes, what changes resulted?

4. Compliance

- Y N
1. Do you require the permit applicant to demonstrate that all major stationary sources owned or operated by the applicant in your State are subject to emission limitations and are in compliance, or on a schedule for compliance, with all applicable emission limitations and standards?
 2. Please describe the following:
 - a. the criteria used by an applicant in a statewide compliance demonstration
 - b. when in the permitting process you require the applicant to make the statewide compliance demonstration.
- Y N
3. Do you include project-specific environmental justice issues that are raised as part of this analysis?
- Y N
4. Do you know of any projects where this analysis resulted in changes to proposed projects?
If yes, what changes resulted?

III. NSR Avoidance

b.

A. RMRR (Routine Maintenance, Repair and Replacement) exemption

- Y N
1. Do you have knowledge of:
 - (a) the EPA letter dated May 23, 2000, to Henry Nickel of Hunton & Williams concerning Detroit Edison and
 - (b) the Wisconsin Electric Power Company (WEPCO) case RMRR documents?
 2. What other documents do you rely upon when making RMRR exemption determinations?

In addition to WEPCO, the DNR used the following court cases to develop a list of questions it asks companies requesting an RMRR determination:

- *United States v. Southern Indiana Gas and Electric Company* (Southern District of Indiana, February 13, 2003)
- *United States v. Ohio Edison* (Southern District of Ohio, 2003)
- *United States, et al., v. Duke Energy Corporation* (Middle District of North Carolina, 2003)
- *United States, et al., v. Cinergy Corp.* (Southern District of Indiana, 2007)

The WEPCO decision and the listed court cases were also used to develop guidance for staff when considering a company's answer to each question.

Y N

3. Do you have a formal protocol for making RMRR exemption determinations?

If yes, describe the protocol.

The DNR has an RMRR Questionnaire (See attachment titled "Section III.A. Questions 1-11_RMRR Questions") that is sent to a company requesting a determination. The questions can also be found on the internet at:

<https://www.iowadnr.gov/Environmental-Protection/Air-Quality/Construction-Permits/Construction-Permitting-Materials#258778-psdcomplex-permits>

Their request then goes through our normal permitting process. The reviewer uses a 2010 RMRR memo to assess the request. The 2010 memo was written to provide guidance for DNR staff on each question asked in the RMRR Questionnaire. The guidance was written based on the WEPCO decision and the court cases listed in Question 2. See the attachment titled "Section III.A. Questions 1-11_2010 RMRR Guidance Memo."

It should be noted that all factors (nature & extent, purpose, frequency, and cost) are considered equally and no more weight is provided to one factor over another.

Each RMRR decision is brought to the attention of EPA Region VII on monthly calls with the regional office in addition to any discussions while the project is under review.

4. Approximately how many formal RMRR exemption determinations have you made in the last five years?

The DNR does not specifically track RMRR determinations, but based on discussions with the staff it is less than five over the last five years.

As discussed in Question 3 of this section each RMRR decision is brought to the attention of the regional office. Also, it is worth noting that an RMRR determination is rarely needed by a company as the use of Baseline Actual Emissions (BAE) to Projected Actual Emissions (PAE) is a simpler process.

- a. Using any one such determination as an example, describe the example, state the conclusion you reached, and discuss how you reached the conclusion.

Northern Natural Gas Company requested an RMRR determination under NSPS Subparts GG and KKKK concerning a turbine core changeout performed at one of its compressor stations.

The process described in Question 3 was followed for this review and EPA Region VII was provided an opportunity to comment on the draft determination.

It was determined that the combustion core changeout was not considered routine maintenance, repair, or replacement. The following materials from that determination are attached:

- RMRR determination letter (Section III.A._Question 4.a._RMRR determination)
- Engineering Evaluation (Section III.A._Question 4.a._RMRR evaluation)
- Northern Natural Gas Company's questionnaire answers (Section III.A._Question 4.a._Northern Natural Gas Questionnaire Answers)

Y N 5. Do you keep documentation of formal RMRR exemption determinations?

All permits, determinations, and documentation related to those decisions are placed in the records maintained by the DNR.

Y N 6. Do you restrict the RMRR exemption to units being modified and exclude replacement of entire units from RMRR exemption consideration?

Y N 7. Regarding the "purpose" evaluation factor in an RMRR exemption evaluation, do you exclude projects from the RMRR exemption that result in an increase in production capacity?

The DNR does not specifically exclude projects that result in an increase in production capacity from requesting an RMRR determination. However, an increase in the production capacity would indicate the project is not routine. This is discussed in the internal DNR guidance memo ("Section III.A._Questions 1-11_2010 RMRR Guidance Memo).

8. Regarding the "frequency" evaluation factor in an RMRR exemption evaluation, which of the following do you consider:

Y N a. the history of the specific unit(s) in question.

Y N b. the history of other similar units at the same facility.

Y N c. the history of similar units at other facilities in the same industry.

Y N d. some combination of these histories.

Please see the internal DNR guidance memo ("Section III.A._Questions 1-11_2010 RMRR Guidance Memo) on how the frequency factor is reviewed.

9. Regarding the “cost” evaluation factor in an RMRR exemption evaluation, what procedure do you follow to take cost into account?

As is discussed in the internal DNR guidance memo (“Section III.A._Questions 1-11_2010 RMRR Guidance Memo), the DNR evaluates whether the funding is:

- A capital expenditure vs. operation & maintenance (O&M) and
- Capitalized vs. expensed.

As is discussed in the memo, projects that fall under normal O&M budgets and are expensed tend to be routine in nature while projects that are part of a capital expenditure budget and are capitalized are typically not routine.

- Y N 10. Do you provide RMRR exemption evaluation training to NSR permitting staff employees (other than on-the-job training)?

If yes, describe the nature of the training provided.

- Y N 11. Do you provide an information outreach program on RMRR exemption evaluations for owners of regulated sources?

If yes, how frequently do you provide such information and how do you provide it?

The DNR does not provide an information outreach program on RMRR mostly due to the very limited number of projects. However, as mentioned above, the DNR RMRR Questionnaire is available online and if a company wishes to pursue an RMRR determination, the staff will devote as much time as necessary to answer questions and explain its determination.

B. PCP (Pollution Control Projects) Exemption

NOTE: Federal pollution control project (PCP) exemption rules and policies were vacated by the U.S. Court of Appeals for the District of Columbia as of June 24, 2005. Please address the following questions for projects approved prior to this decision.

The Iowa DNR has not use the PCP exemption since the vacatur by the Court. The answers supplied below are based on the Iowa DNR practices prior to the vacatur.

- Y N 1. Do you have standard permitting procedures or rules that allow for certain changes at non-utility emissions units to be designated as PCP, which are excluded from major NSR?

The DNR did have PCP procedures until the Court vacated the PCP exemption. It is believed that no non-utility emission units used the option while it was available.

2. How many PCP exclusions have been granted for “feed” or “fuel” switches?

PCP projects for the Iowa DNR appear to have been limited to utility boilers adding NOx controls such as low-NOx burners, overfired air, or combustion controls.

3. What process do you use to determine if the project is “environmentally beneficial” and not just “economically efficient”?

The project in question had to meet the following criteria:

- (1) The project could not render the unit less environmentally beneficial,
- (2) The pollution control project would not result in a significant net increase in representative actual annual emissions of any criteria pollutant over levels used for that source in the most recent air quality impact analysis in the area conducted for the purpose of Title 1, and
- (3) The increase would not cause or contribute to a violation of any national ambient air quality standard (NAAQS) or PSD increment, or visibility limitation.

4. How are the collateral emission increases evaluated? Do you require a modeling analysis to demonstrate insignificant impacts from emissions increases?

Modeling was required if any emissions increased over the PSD significant threshold for the criteria pollutant in question.

5. How do you handle collateral increases in hazardous air pollutants (HAP)?

The Iowa DNR did not have a state toxic air pollution program at that time. Currently, all HAPs are regulated through the National Emission Standards for Hazardous Air Pollutants (NESHAP).

Y N

6. Are the emission reduction credits from PCP available for netting or NSR offsets? Please explain.

The projects involved were initiated as a result of the requirements to lower NOx emissions under the 1990 Clean Air Act Amendments, and are therefore not available for credit.

7. Which add-on control devices are most frequently involved in PCP exclusion requests?

The most common project was the installation of Low-NO_x burners. Another company (Alliant Energy) permitted projects for six of its facilities which involved the addition such things as wind box air flow adjustments, improved burner and/or combustion controls, coal feed modifications, etc. It should be noted four of the facilities permitted for the change did not make the allowed changes.

8. Which types of industrial sources typically request PCP exclusions from major NSR?

When the Iowa DNR permitted pollution control projects it was typically for boilers at utilities.

- Y N 9. Does your NSR SIP include the PCP exclusion for electric utility steam generating units (often referred to as the WEPCO exclusion)?

The Court vacatur of the PCP exemption led to the SIP being rewritten to remove that option.

C. Circumvention/Aggregation

- Y N 1. When you review a modification to determine if it is major for NSR, do you consider aggregating prior minor emissions increases at the stationary source?

2. Please provide any criteria you may use to determine if a series of minor modifications or projects needs to be aggregated for NSR applicability purposes?

In the past the Iowa DNR had evaluated the aggregation of projects based on EPA guidance using a combination of timing and technical factors. The Iowa DNR had evaluated EPA's final rulemaking that was published in the Federal Register in November 2018 (See documents titled Section III.C. Question 2 Project Aggregation summary 2019 and Section III.C. Question 2 Project Aggregation Comparison). However, no decision had been made on how the Iowa DNR would approach project aggregation decisions since the Natural Resources Defense Council (NRDC) had filed a petition for review with the D.C. Circuit Court in 2019.

Just recently the Iowa DNR discovered this petition had been dropped so the Iowa DNR needs to determine how it will proceed with project aggregation decisions especially since this guidance is involved in the Project Emissions Accounting (PEA) rule.

- Y N 3. When requests are made to permit new or modified emissions units as separate minor changes over time, do you evaluate whether the permitting process is purposely staged as minor when the changes are really one permitting action subject to major NSR?

D. Synthetic Minor Permit Limits

- Y N 1. Do you keep a list of synthetic minor sources (*i.e.*, sources that would otherwise be major for NSR but are considered minor because of emissions limits or other limiting conditions in their permits) that is available for review by the public and EPA?

If yes, please explain how.

2. Describe your formal process for establishing or designating a synthetic minor source.

The construction permit process reviews the facility PTE and establishes enforceable limits as needed in permits used to designate a facility as a synthetic minor.

Y N

3. For synthetic minor sources, do your permits include enforceable limits to keep the sources minor?

Permits include short term and long term emission limits and operating limits as needed. Footnotes on the limits specify that the basis of limits is for synthetic minor status.

If not, please explain why.

4. Please describe how compliance with the synthetic minor limits is tracked over time?

Emission limits may have a stack test to confirm. Operating limits have daily, monthly, and 12-month or 365-day rolling tracking and recording, as needed.

Y N

5. Are you satisfied that your tracking activities are sufficient to ensure that sources getting synthetic minor permits to avoid major NSR review are not actually operating above the applicable major source threshold?

Facilities nearing major thresholds are required to have more frequent calculations to ensure status.

Y N

6. Do you include in your synthetic minor permits conditions requiring sources to notify you if and when the major source threshold is reached?

Y N

7. Do you perform (or require) modeling for sources seeking synthetic minor permits to determine impacts on PSD increments?

Y N

8. Do you consider visibility issues in Class I areas, if applicable, when reviewing synthetic minor applications?

Y N

9. Do you include "prompt deviation" reporting requirements in synthetic minor source permits?

If yes, how do you define "prompt deviation"?

567 IAC 24.1(2), An incident of excess emission shall be reported within eight hours of, or at the start of the first working day following, the onset of the incident.

Y N

10. Do permit applications reviewed by your agency and permits issued identify the requirements (e.g., PSD, nonattainment Major NSR, Title V, NESHAP) being avoided by keeping the source minor?

E. Relaxation

1. Describe your knowledge of the “relaxation” regulatory provisions of 40 CFR 51.165(a)(5)(ii), 51.166(r)(2), and 52.21(r)(4).

The Iowa DNR interprets the relaxation provisions of CFR 51.165(a)(5)(ii), 51.166(r)(2), and 52.21(r)(4) to mean that any relaxation in any enforceable limitation would require the facility to reevaluate the project as if it were new construction. Thus, the company must return to the original project (or when the limitation was taken) and reevaluate the emission increases. If this causes the source to become major or a major modification, the project must undergo PSD review as if it was a new project at the time the relaxation is requested.

2. What types of changes do you consider potentially subject to relaxation assessments?

The Iowa DNR considers any increase in any enforceable limitation potentially subject to relaxation assessments. These would include, among other things, emission limits, production limits, production capacity, hours of operation, and types of materials or material contents.

Y N

3. Do you have a written policy on relaxation assessments?
4. Approximately how many relaxation assessments have you made in the last five years?

The Iowa DNR does not track relaxation assessments. Recently, a request was made to relax synthetic minor limits for a facility that became a minor source for PSD. The company obtained the limits when they were major, then became minor, and then asked to relax the limits since they are now a minor source.

The Iowa DNR is working with EPA region 7 and headquarters on the determination. The details of the determination are attached in the document titled NSR Relaxation Determination for review.

Y N

5. Do you include specific permit conditions to make potential future relaxation possibilities more identifiable?

For any emission limitation, a footnote is added in the permit to indicate the limitation was added to avoid PSD review. For all limitations, the Construction Permitting staff thoroughly document the reason for the limitation in the engineering evaluation, which is required for each project. As part of each review, the permit reviewer must review all information pertinent to the review of existing units, which includes the engineering evaluation and all limitations established for the unit.

6. What is your understanding of the appropriate circumstances under which an existing minor source is allowed a 100/250-tons-per-year emissions increase without triggering relaxation provisions?

If a facility was originally limited to 100/250 tpy to be a synthetic minor source, they would be allowed a one-time doubling of 100/250 tpy. However, both emission limits would stand and the facility would have to show compliance with both limits. The facility would not be allowed to remove (relax) the original limit and have one 200/500 tpy limit.

- Y N 7. Do you provide relaxation evaluation training to NSR permitting staff employees (other than on-the-job training)?

If yes, describe the nature of the training provided.

All staff are required to perform five training courses annually, which includes PSD training (external or internal). The Iowa DNR also periodically provides NSR training to the construction permitting staff, which includes the topic of relaxation provisions. In addition, information concerning the relaxation of PSD limits is part of the Construction Permitting Section's Construction Permit Manual, which is used for all projects.

IV. Minor Source Construction Permitting Program

- Y N 1. Do you require monitoring or reporting requirements for minor sources?
- a. If so, do you establish these requirements based on a rule or a general policy of effective permit writing?

Effective permit writing requirements are that any operating limit should have a corresponding monitoring and recordkeeping requirement.

- Y N 2. Does the application or permitting process require modeling for minor sources?

It can, based on the size of the increased emissions, or previous modeling which demonstrated predicted model results near the NAAQS for that pollutant. See application Form MD for details.

- Y N 3. Does your minor source permit program include a technology component similar to BACT in the PSD program?

Y N

4. Do you require minor sources with Federally applicable permit limits for MACT, NSPS, or NESHAP to report compliance?

Yes, for those sources obtaining an air quality construction permit, all reporting requirements are referenced in the air quality construction permits. However; sources are expected to meet their reporting requirements as specified by the rule.

More generally, the Iowa DNR implements the NSPS and NESHAP rules by reviewing the rules with each project and adding the requirements of the rule to the permits. In general, the Iowa DNR tries to add all of the requirements of the rule to the permits. However, in some cases it is better to provide a summary of the rule. In all cases, the permit contains language that states that the facility must comply with all of the conditions of the rule, and, at a minimum, provide the citations of the major requirements in the rule. This includes reporting requirements.

The Iowa DNR also makes rule determinations and provides detailed responses to the regulated community. In both cases, the Iowa DNR thoroughly reviews the rules, has internal discussions, and, if necessary, works with EPA to ensure the rules are applied correctly and consistently.

The Iowa DNR also has a designated staff member to be the main contact for these determinations and to oversee what should be included in the permits to ensure they are consistent and correct to the best of the knowledge of the Iowa DNR staff.

In addition, the Iowa DNR has designated a number of staff to act as the main contact for certain rules that are commonly regulated. Regular meetings are held to ensure the effort is coordinated and complete. This group follows updates in rules coming from EPA, the Air Quality Bureau's Program Development section, and external groups such as NACAA.

The Iowa DNR also provides ongoing training for NESHAP and NSPS rules to staff and the public. For any new or modified NSPS or NESHAP rules the Iowa DNR uses the following procedure:

- Review the new and revised NSPS and NESHAP regulations.
- Write summary of new or revised NSPS and NESHAP regulation for use by supervisor and other engineering staff.
- Make recommendation to supervisor on if a workgroup should be formed to handle any NSPS or NESHAP regulation changes.
- Make recommendation to supervisor on if any assistance materials or outreach should be made to affected facilities.
- Make recommendations to supervisor if any training is needed for internal staff on new or revised NSPS or NESHAP.

- If training is recommended, create training presentation and present to staff, as appropriate.

A couple of recent examples of this procedure is how the new MACT Major to Area Source Rule (MM2A Rule) and all of the changes in the NESHAP rules due to Risk and Technology Review (RTR) review were handled.

For the new MM2A guidance and the new rule, the Iowa DNR developed a summary of the guidance and provided the staff and public with a fact sheet covering the requirements of the guidance/rule and how it would be implemented. Training was provided for the MM2A rule. A presentation on the changes in the guidance, proposed rule, and final rule were prepared and presented to staff at an internal meeting and to stakeholders at a client contact meeting. The information was then made available to the public on the Iowa DNR website.

All of the NESHAP rules that were modified for RTR were also reviewed. The Iowa DNR summarized the changes and provided links to the new rules. This information was made available to the public via the AQ technical listserv (over 23,000 people). The summary provided contact numbers for the public and stakeholders if there were additional questions on the changes.

Annually, the Iowa DNR provides training to the public on a number of topics based on current needs. This includes training on NSPS and NESHAP rules. If the the Iowa DNR believes training is needed on any modified or existing rules it can be provided during annual training sessions or more frequently if needed.

These efforts are undertaken to ensure the regulated community is complying with all aspects of the rules and regulations including reporting requirements.

V. Modeling

C.

A. PSD Modeling

1. General

- Y N 1. Do you follow EPA's modeling guidelines in 40 CFR Part 51 Appendix W?
- Y N 2. Are deviations from the modeling guidelines in Appendix W subjected to public comment and submitted to the regional EPA office for approval?

The Dispersion Modeling staff would consult with EPA and the public would have an opportunity during the public comment period for the project.

- Y N 3. Do you ask applicants to submit a modeling protocol for approval prior to submitting modeling?

- Y N 4. Is the protocol provided to other interested organizations (e.g., EPA, Federal Land Manager)?
- Yes, if there is interest in the project the Iowa DNR would provide a copy of the modeling protocol.
- Y N 5. Is the effect of downwash modeled if stacks are less than good engineering practice (GEP) height?
- Y N 6. Are modeling analyses available for public review?
- Y N 7. Do you review modeling submittals to determine if option switches are correct?
8. When off-site meteorological data are used, what years are typically used?
- Currently 2015-2019. The meteorological data is updated every five years.
9. How do you train/re-train your modeling staff?
- There is a training plan for new employees (attached). Existing staff attend ongoing training as needed (APTI, Censara, etc). The Dispersion Modeling group regularly QA projects conducted internally, which may reveal opportunities for additional training.
- Y N 10. Do you follow The Air Quality Analysis, Additional Impacts Analysis, and Class I Area Impact Analysis guidance provided in the New Source Review Workshop Manual (Draft October 1990)?
11. For cumulative national ambient air quality standards (NAAQS) and PSD increment compliance assessment:
- a. How are the appropriate emission inventories of other sources developed?
- See Modeling Inventory Procedures (attached)
- b. What are the reasons used to identify and/or eliminate emission sources?
- See Modeling Inventory Procedures (attached)
- c. How are PSD increment consuming/expanding sources identified and tracked?
- Permit and start of operation dates are used to identify sources. The results are recorded in the modeling memo and kept in the record for future reference.

12. What is the basis (e.g., allowable, maximum or average actual short-term emissions, last two year period, etc.) of the emission rates provided in the NAAQS and PSD increment consuming inventories of other sources?

NAAQS: allowable

Increment: the Iowa DNR will generally start by conservatively assuming the full allowable emission rates. A switch is made to actual emissions if allowable emission rates show a problem in the modeling analysis. The average from the previous two years is used if the source reports annually, otherwise the most recent year. The actual emission rates are calculated using the reported actual ton/yr converted to lb/hr using reported actual hr/yr.

13. How do you ensure that the controlling concentrations reported by the applicant for each pollutant and averaging period were appropriately determined?

A full review of all model inputs is conducted and reevaluation of the analysis is performed if it is determined that the modeled concentrations were not appropriately determined.

- Y N 14. Are the impact modeling analyses reviewed to ensure that they are accurate and complete, and that appropriate modeling procedures (e.g., modeled to 100-m resolution, fence line and not property line, nearest modeled receptors, etc.) were followed?

- Y N 15. Is complex terrain an issue in your region?

If yes, what modeling procedures are used to address impacts in complex terrain?

Generally not, but there are some river valleys that affect flow and/or can result in plume impaction on terrain. Met data representivity analysis is used to determine that the correct data is used. NED files are used to capture terrain elevations. The model is rarely run without terrain elevations.

- Y N 16. Are pollutants without NAAQS and/or PSD increments addressed in the air quality impact assessments?

If yes, what threshold concentrations (e.g., acceptable ambient concentrations) are used to evaluate impacts?

Y N 17. Do you have written agency-specific air quality modeling guidance for use by applicants?

Y N If yes, has the guidance been provided to other concerned organizations (e.g., regional EPA, appropriate FLM, etc.) for review and comment?

The Iowa DNR releases drafts of proposed changes to guidance documents to the public for review before finalizing the changes. Notifications of the availability of draft guidance documents for public review are made through the AQ technical listserv (over 23,000 people) and at AQ Client Contact meetings.

If yes, is your guidance available on the internet?

Y N

18. How do you determine the appropriateness of proposed meteorological data for an application?

a. When are “on-site” meteorological data required for an application?

If the applicant does not wish to use the data the Iowa DNR has determined is representative, or an alternative conservative approach as discussed on page 17 of the meteorological data TSD, which is available at <https://www.iowadnr.gov/Environmental-Protection/Air-Quality/Modeling/Dispersion-Modeling/Meteorological-Data>

Y N

b. Are “on-site” meteorological data validated and accepted if recovery is less than 90 percent?

Generally no. However, if the data would be superior to anything else available the Iowa DNR would consider it on a case-by-case basis and in consultation with EPA.

19. When an applicant’s air quality modeling reveals NAAQS and/or PSD increment violations, what is required to grant the permit and how are the violations resolved?

Iowa DNR requires (567 IAC 22.3(1)“b”) mitigation of the exceedances in the model or a demonstration that the project being evaluated is insignificant at every predicted exceedance prior to issuance of the permit(s).

Y N

20. Do your regulations include the federal definition of ambient air?

If no, what is your definition of ambient air?

21. Discuss your procedures for modeling “hot spots,” including minimum receptor spacing?

Receptors are required in Iowa DNR's Modeling Guidelines to be spaced at 50-meter intervals along, and within 500 meters of, the ambient air boundary, as well as any other areas with elevated concentration. The Guidelines are available here:

<https://www.iowadnr.gov/Environmental-Protection/Air-Quality/Modeling/Dispersion-Modeling>

22. How do you determine if background air quality data are representative?

The Iowa DNR uses a conservative default, or a case-by-case value proposed by the applicant and approved by the DNR. This is described in the Iowa DNR's background concentration TSD available at <https://www.iowadnr.gov/Environmental-Protection/Air-Quality/Modeling/Dispersion-Modeling/Background-Data>

Y N 23. Do you use the same NAD for stack, receptor, and building UTM coordinates?

2. Class I Areas

This section is currently not applicable for projects in Iowa. There are no Class I areas within 100 km of Iowa's borders.

1. How do you determine which proposed projects need a Class I impacts analysis, including consideration of distance of the source from Class I areas (e.g., maximum distance criteria)?

Y N 2. For new or modified sources within 10 kilometers of Class I areas, do you require sources to submit an impact analysis for all pollutants to determine if any have impacts greater than 1 ug/m³?

Y N 3. Do you require applicants to submit a Class I increment analysis for each pollutant subject to PSD review for which an increment exists?

Y N 4. Do you require applicants to identify and provide a cumulative impacts analysis (maximum impact within Class I areas) for all Class I areas impacted by the source?

Y N 5. Do you have a formal procedure for notifying Federal Land Managers (FLMs)?

If yes, please explain.

Y N 6. Do your permitting procedures require the applicants to notify Federal Land Managers?

If yes, please explain.

Y N 7. Is there communication, consultation, and discussion between you and FLMs?

If yes, to what extent (e.g., high, moderate, minimal).

- Y N 8. Is there communication, consultation, and discussion between the applicant and FLMs?

If yes, to what extent (e.g., high, moderate, minimal)?

- Y N 9. Do you actively seek input from FLMs during the permitting process?
- Y N 10. Is the applicant required to address potential adverse impacts on air quality related values (AQRVs) that are identified by the FLM during the notification process?
- Y N 11. Do you require prior approval of Class I area impact analysis procedures that applicants plan to use?
- Y N 12. Do you require applicants to perform a visibility analysis for Class I areas?
- Y N 13. If visibility impairment is indicated, do you require the applicant to notify the appropriate FLM for the Class I area?
- Y N 14. Is the applicant required to address potential effects on scenic vistas associated with Class I areas that may have been identified by the FLM during the notification process?
- Y N 15. Do you have a formal process for handling Class I area increment violations if predicted?
- Y N 16. Have you issued PSD permits where the FLM objected?

If yes, please explain and identify the projects.

B. Nonattainment Major NSR Modeling

- Y N 1. Do you require modeling to ensure that emission offsets provide a positive net air quality benefit? (Only applies to sulfur dioxide, particulate matter, and carbon monoxide nonattainment areas.)

C. Minor Source Modeling

- Y N 1. Are minor permit actions (*i.e.*, proposed new and modified minor sources), evaluated to determine if modeling for PSD increments is needed?
- a. Under what circumstances is increment modeling triggered for these minor permit actions?

- Y N 2. Do you use modeling to assure that minor sources and minor modifications will not violate the NAAQS?

If so, at what emission thresholds?

The lb/hr equivalents of the PSD significant emission rates (assuming 8760 hr/yr). The Iowa DNR will also evaluate projects at facilities with previous modeling that is within 1 SIL of the NAAQS. The Iowa DNR minor source modeling determination procedures are described in detail on Form MD, which is available at

<https://www.iowadnr.gov/Portals/idnr/uploads/forms/5420948.pdf>

Modeling was used to define permit limits for asphalt, concrete, and aggregate plants, resulting in permit templates that applicants can use without additional modeling.

<https://www.iowadnr.gov/Environmental-Protection/Air-Quality/Construction-Permits/Construction-Permitting-Materials>

- Y N 3. Based on any modeling results, do you require installation of air quality monitors or establish other permit conditions to assure protection of the NAAQS and increment?

Permit conditions such as operational limits are often included in construction permits in order to mitigate predicted exceedances of the NAAQS.

- Y N 4. For the pollutants with PSD increments established do you have a list of areas where the minor source baseline has been triggered?

- Y N 5. Do you model minor sources for PSD increments if the minor source baseline is triggered?

But only as part of a PSD application in the vicinity at another source, not as a result of a non-PSD application.

- Y N 6. Do you have procedures in place to identify minor sources that consume or expand PSD increment?

Refer to modeling inventory procedures (attached).

D. Increment Tracking

1. What method do you use to assign baseline dates (e.g., county-specific, region-specific, or entire state)?

The method depends on the pollutant. For PM₁₀ Iowa DNR uses the previous TSP nonattainment areas, which can be municipal boundaries or townships, then remainders of the counties in which these are located, and finally the remainder of the state. For PM_{2.5} Iowa DNR uses counties. For NO₂ and SO₂ Iowa DNR uses the entire state.

- Y N
2. Do you have a list of the minor source baseline dates for each area?

If yes, please provide a copy.

This is available on the Iowa DNR website under the "PSD Modeling Guidance" tab: <https://www.iowadnr.gov/Environmental-Protection/Air-Quality/Modeling/Dispersion-Modeling>

- Y N
3. Do you have an understanding of receptor location dependence vs. source location dependence for increment tracking?

- Y N
4. Do you have a program for tracking increment consumption?

If yes, please describe the program and whether it is a formal or an informal program?

Iowa DNR uses a formal source location dependent method of tracking increment. The maximum concentration indicated in PSD increment modeling analyses is recorded in the analysis review memo.

- Y N
5. Do you maintain and update a computerized emission source database for increment tracking that includes minor sources that affect increment?

If yes, does the database include the information needed for modeling (e.g., source locations, stack parameters, emissions)?

6. Do you use allowable or actual emissions for increment tracking purposes?

Iowa DNR generally starts with allowable emissions unless doing so causes predicted exceedances. In these instances Iowa DNR would revert to actuals for all or a subset of the sources in the analysis.

- a. If actual emissions, how do you calculate emissions for each averaging period covered by the increments?

Actual emissions are calculated using the most recent 2 years of emissions data (reported actual ton/yr and actual hr/yr are used to determine the lb/hr rate).

Y N

7. Are area sources included in increment tracking analyses (e.g., growth-related and transportation-related emissions)?

These emissions are considered part of the background. Growth affects are considered in the additional impact analysis.

8. How frequently is increment consumption evaluated - on a scheduled basis or just when occasioned by a new permit application?

When a PSD application that will result in a significant concentration is reviewed.

9. How “transparent” (i.e., understandable) is the emission source inventory used for PSD modeling? (i.e., could an outside reviewer (such as a member of the public) clearly identify the sources included (e.g., name, location, stack parameters) and the sources excluded in a modeling analysis?)

Iowa DNR uses a standardized review memo that summarizes all source parameters in tables that are readily understandable to the public.

10. How do you handle interstate increment tracking (for state reviewing authorities) or inter-jurisdiction tracking (for local reviewing authorities), including consistency of tracking across jurisdiction boundaries?

If a project will be located near a state border the Iowa DNR will contact the neighboring state(s) and request source inventories from them to include in the analysis. For the Linn and Polk county local programs, Iowa DNR maintains the increment tracking for each county.

11. What procedure do you follow in planning for and incorporating new modeling tools?

Y N

12. Do you provide increment tracking training to NSR permitting staff (other than on-the-job training)?

If yes, describe the nature of the training provided.

Y N

13. Are mobile sources modeled for increment compliance?

14. How does the public access a list of sources that affect PSD increments?

The public can review previous project memos through the DocDNA electronic records system (<https://www.iowadnr.gov/Environmental-Protection/Air-Quality/Public-Records-Air-Quality>) or request an inventory list from Iowa DNR at the time of an application.

VI. Other Program Elements

d.

A. Environmental Justice (EJ)

e. Note: By EJ analysis we refer to any procedures applied during the permitting process, regardless of whether they are called EJ, that consider demographics (race, income, nationality, etc.), cumulative effects, (burden, exposure, risk), comparative effects or modifications to the public involvement processes to address unique characteristics of the project.

Y N 1. Do you consider EJ issues during the permitting process? If yes, please provide a description of the criteria, guidelines, or screening procedures used to address EJ issues.

Y N 2. Regarding section 173(a)(5) of the Clean Air Act, do you conduct an alternatives analysis as part of your nonattainment area permitting process? If yes, please provide a description of the EJ criteria or guidelines used for this analysis.

DNR has not conducted a major nonattainment NSR permitting project since 2000. Therefore, DNR does not have contemporaneous information regarding this question at this time.

Y N 3. Regarding section 165(a)(2) of the Clean Air Act, does your NSR permitting program and public comment process for PSD regulated pollutants provide for consideration of alternatives?

4. How are the demographics of the affected community taken into account in the permitting process?

Demographics are not taken into account.

5. How are cumulative effects and/or pre-existing burden addressed in the permitting process?

Cumulative dispersion modeling is conducted in accordance with federal regulations.

6. What additional community information and/or demographics (for example – children, the elderly) do you consider important for an EJ analysis?

See answer to Q1 of this section.

Y N 7. Do you allow public involvement during an EJ analysis? If yes,

a. What stakeholder groups do you try to involve?

b. At what point in the EJ analysis or permitting process do stakeholders become involved?

- c. To what degree and in what manner do stakeholders or the community influence the permit decision making process?
- d. To what degree do you know about how stakeholders or the affected community participated in the permit decision making process?
- e. Describe how you make information available to stakeholders and the affected community. (For example – translation of information, understandable and accessible materials, personal contacts, clearly explained technical information including potential risk, distribution of information, public meetings, etc.)

Not Applicable.

- Y N
8. In the EJ analysis, do you consider direct and indirect benefits and burdens from the proposed actions? If yes,
- a. Describe what benefits you consider in the EJ analysis. (For example – economic, social, cultural, health, environmental, etc.)
 - b. Describe what burdens you consider in the EJ analysis. (For example – economic, social, cultural, health, environmental, etc.)

Not Applicable.

- Y N
9. In the EJ analysis, do you consider comparative and disproportionate impacts? If yes,
- a. Describe the criteria or procedures used to determine any potential or actual adverse health or environmental effects or impacts.
 - b. Describe the criteria or procedures used to determine whether evidence exists to describe these effects or impacts.
 - c. Describe the criteria or procedures used to determine whether the proposed project complies with all applicable environmental laws.

Not Applicable.

f.

B. Endangered Species Act (ESA)

- Y N
1. If you have a delegated PSD program, do you notify PSD permit applicants of their ESA obligations?

If so, please provide a copy or description of your notice.

Not Applicable.

- Y N 2. If you have a delegated PSD program, do you advise applicants, concerning their ESA obligations, to consult with a.) EPA; b.) The U.S. Fish and Wildlife Service; and/or c.) Federal Land Manager?

If yes, please explain, and describe what information you provide to applicants concerning their ESA obligations.

Not Applicable.

- Y N 3. If you have a SIP approved PSD program, do you have any responsibilities under your state law to carry out an endangered species analysis?

If so, please briefly describe the scope of the program. If no, please so indicate.

The Iowa air quality regulations do not specifically require an analysis of endangered species as part of the SIP approved PSD program. However, Iowa does have an endangered and threatened species law which was enacted in 1975 (See Iowa Code Chapter 481B). This program is managed by the Conservation Division of the Iowa DNR (<https://www.iowadnr.gov/conservation/iowas-wildlife/threatened-and-endangered>). A current list of endangered, threatened, and special concern species can be found in 571 IAC 77.2 (list of animals) and 571 IAC 77.3 (list of plants).

In past PSD projects, applicants have been asked to provide a list of those species in 571 IAC 77.2 and 571 IAC 77.3 that are within the impact area of concern for the project along with any potential impacts. That information is provided as part of the Technical Support Document so the public can be made aware of the impacts during the public comment process.

- Y N 4. If you carry out a federal or state ESA review, does the consultation affect the timing of your issuance of a proposed or final permit?

If yes, please explain.

Not Applicable.

C. State & Local Agency Coordination

- 1.
1. How do the local and state agencies coordinate permitting-related responsibilities?

Polk County issues minor NSR permits including synthetic minor permits. State reviews and issues major PSD projects. Linn County issues minor NSR permits including synthetic minor permits. Linn County reviews and drafts PSD permits. The State issues final PSD permits.

2. How does the department overview the local agency's permitting activities?

Each county program is audited every two years.

Y N

3. Does the local agency routinely send draft and final permits to the state agency for review, comment, and concurrence?

If yes, please explain the details.

The contracts with the local programs require the following draft permit types to be reviewed for concurrence:

Prior to issuance, the Local Program shall submit to DNR for concurrence a copy of each draft construction permit, if the draft or related determinations have not been previously reviewed by DNR, containing or using the criteria listed below in the proposed final determination.

- a. Criteria requiring DNR concurrence:

- 1) NESHAP, MACT or NSPS requirements at greenfield sites except for tanks, generators, natural gas only boilers, or paint booths at minor sources;
- 2) Limits to avoid PSD major source review (synthetic minors);
- 3) Netting conducted under Step 2 of the NSR applicability analysis;
- 4) Routine maintenance or replacement (RMRR) decisions;
- 5) Capable of accommodating or demand growth emission exclusion decisions;
- 6) BAE to PAE calculations resulting in a reasonable possibility as defined in 567 IAC 33.3(18)"f"(8); and
- 7) Major source reclassification decisions under CAAA §112.

4. How often does the local agency provide the state with information on its permitting activities?

Bi-weekly staff meetings and on other specific projects as consultation is needed or as required by the contracts.

5. Do you interact with other state environmental media programs (e.g. water, RCRA, waste) when permitting complicated projects?

Yes, in the past the Construction Permitting Section has worked with other state environmental media programs such as the Solid Waste Section and the various sections within the Water Quality Bureau when working on complex permitting projects. In addition, the section has worked with the Iowa Economic Development Authority on some large projects.

6. Please provide a copy of the most recent program review you have completed for each local agency with all or a portion of the NSR permitting responsibilities in the state.

The final reports for Linn County (document titled Section VI.C.6 - FinalReport_Linn2019ProgReview) and Polk County (document titled Section VI.C.6 -Final Report_2020PolkProgramReview) are attached.

Compliance & Monitoring Section

Air Quality Bureau, Wallace State Office Building , 502 E 9th Street, Des Moines, IA 50319-0034
Catharine Fitzsimmons, Bureau Chief

Kayla Lyon, Director

Alex Moon, Deputy Director

Ed Tormey, Division Administrator

Jason Marcel
Bureau Chief,
Field Services and Compliance Bureau
Years of Service = 23

Kurt Levetzow
Supervisor
Years of Service = 23

Brian Hutchins
Supervisor
Compliance & Monitoring Section
Years of Service = 25

Tamara Mullen
Bureau Chief
Legal Services Bureau
Years of Service = 13

Kayla Beck
Environmental Specialist
Years of Service = 2

Cindy Martens
Environmental Specialist Sr
Years of Service = 30

Ryan Stouder
Environmental Specialist Sr
Years of Service = 21

Julie Duke
Environmental Specialist
Compliance
Years of Service = 8

Alex Randall
Environmental Specialist
Stack Testing
Years of Service = 7

Kelli Book
Attorney
Years of Service = 22

Bryan Bunton
Environmental Specialist
Years of Service = 20

David Miller
Environmental Specialist
Years of Service = 10

Brenda Streicher
Environmental Specialist
Years of Service = 33

Mark Fields
Environmental Specialist Sr
Compliance & Stack Testing
Years of Service = 14

Kristofer Schult
Environmental Specialist
Stack Testing
Years of Service = 1

Anne Preziosi
Attorney
Years of Service = 32

Caroline Davis
Environmental Specialist
Years of Service = 1

Thad Nanfito
Environmental Specialist
Years of Service = 20

Jeff Theobald
Environmental Specialist
Years of Service = 26

Sarah Mousel
Environmental Specialist
Compliance
Years of Service = 1

Lucas Tenborg
Environmental Specialist
Compliance
Years of Service = 0

Legal Services Bureau
Years of Service = 67

Bill Gross
Environmental Specialist Sr
Years of Service = 37

Clark Ott
Environmental Specialist Sr
Years of Service = 30

Holly Vandemark
Environmental Specialist Sr
Years of Service = 24

Air Quality Bureau - Compliance Section
Year of Service = 56

Mark Heiderscheid
Environmental Specialist
Years of Service = 27

Jon Ryk
Environmental Specialist
Years of Service = 13

Wendy Wittrock
Environmental Specialist
Years of Service = 6

David Knoll
Environmental Specialist Sr
Years of Service = 20

Michelle Sabatini-Rosaker
Environmental Specialist
Years of Service = 8

Amber Wolf
Environmental Specialist
Years of Service = 13

Field Office Service Years = 387

Construction Permits Section

Air Quality Bureau, Wallace State Office Building , 502 E 9th Street, Des Moines, IA 50319-0034
Catharine Fitzsimmons, Bureau Chief

Kayla Lyon, Director

Alex Moon, Deputy Director

Ed Tormey, Division Administrator

Sarah Piziali, Supervisor
Construction Permits Section
Years of Service = 19

Jim McGraw, Supervisor
Program Development & Support Section
Years of Service = 24

Shawn Corbin
Environmental Engineer
Construction Permit Review
Years of Service = 20

Karen Kuhn
Environmental Engineer Sr
PSD Permit Review
Years of Service = 26

Nate Tatar
Environmental Engineer
Construction Permit Review
Years of Service = 3

Program Development

Dispersion Modeling

Support

Jessica Reese McIntyre
Environmental Specialist
Records Support & Data
Entry
Years of Service = 5

Brad Ashton
Environmental Specialist Sr
Dispersion Modeling & SIPs
Years of Service = 20

Kevin Connolly
Environmental Specialist Sr
SLEIS/EASY Air Help Desk
Years of Service = 25

John Curtin
Environmental Engineer
Construction Permit Review
Years of Service = 21

Priyanka Painuly
Environmental Engineer
Construction Permit Review
Years of Service = 20

Peter Zayudis
Environmental Engineer Sr
PSD, SIP, & Nonattainment
Years of Service = 23

Virun Rongkavilt
Environmental Specialist
Records Support & Data
Entry
Years of Service = 29

Alyssa Jensen
Environmental Specialist
Dispersion Modeling
Years of Service = 8

Jason Dowie
IT Support Worker 4
SLEIS/EASY Air Help Desk
Years of Service = 13

Corey Detter
Environmental Engineer
Construction Permit Review
Years of Service = 25

Rachel Quill
Environmental Engineer
Construction Permit Review
Years of Service = 17

Danjin Zulic
Environmental Engineer
Construction Permit Review
Years of Service = 7

Ashley Dvorak
Environmental Engineer
Construction Permit Review
Years of Service = 7

Chris Roling
Environmental Engineer Sr
PSD Permit Review
Years of Service = 25

Michael Hermsen
Environmental Engineer Sr
PSD, NSPS, & NESHAP
Years of Service = 22

Gary Smith
Environmental Engineer Sr
PSD Permit Review
Years of Service = 25

Tammy Friedman
IT Support Worker 2
Construction Permit Data
Entry & Support Services
Years of Service = 20

Years of Service for the Construction Permit Section = 241

Years of Service for the Program Development Section = 120

Total Years of Service = 361

NSR Relaxation Determination

John Deere submitted a letter dated June 27, 2019. The facility wanted to simplify the air permitting for the John Deere Dubuque Works facility by requesting the DNR remove the individual paint booth synthetic minor VOC emission limits set while the facility was a major stationary source.

John Deere and their consultant (RTP Environmental) claimed the permit change was not subject to the source obligation rule and also claimed this was consistent with prior EPA decisions.

However, that viewpoint is different from NSR training the DNR staff had received over the years, including training conducted by RTP. The DNR did review the EPA decisions referenced by John Deere and an additional decision by the State of Colorado.

After reviewing the past decisions the DNR sent an email with an attached document to EPA Region VII on June 19, 2020. This document provided a history of the New Source Review (NSR) program and 40 CFR §52.21(r)(4), the company's background, the request, the permitting cases we reviewed, a brief Iowa DNR analysis, and questions for EPA (last page).

The email stated "The State of Iowa has adopted the PSD regulations into its State Implementation Plan (SIP), but removal and relaxation of synthetic minor limits is not an "Iowa only issue" and is a "program issue." Therefore, it is most appropriate to have the Environmental Protection Agency (EPA) address the questions related to this issue for the sake of consistency of applicability within the PSD program."

This request was sent to EPA Headquarters and as of this date we still have not received an official answer from EPA regarding the relaxation of PSD synthetic minor limits in cases where the facility becomes a minor stationary source.

At this time, the Department has not removed or relaxed these limits. The Department will wait for a determination from EPA before proceeding with the project.

Making Your Comments Count

The public plays an important role when the Iowa Department of Natural Resources (DNR) prepares air quality permits or updates state rules. DNR strives to ensure all projects meet federal and state standards. While DNR staff have the technical expertise, the public may identify other issues—protecting everyone’s air quality.

KEYS TO AN EFFECTIVE COMMENT



Point Out Unintended Consequences

Well-intended rules or permitting actions sometimes result in unintended consequences. Thoughtful public feedback may reveal these effects.



Provide Technical Information

Comments and assumptions supported by technical information are more helpful than general statements or form letters.



Suggest Alternative Solutions

Explain your concerns as clearly as possible and, if appropriate, suggest alternative requirements or different language.



Ask Questions

DNR staff welcome your questions. Understanding technical requirements can help you develop a meaningful comment or address your concerns. If you have questions, find DNR’s experts on the [public participation page](#) or call 515-725-8200.

COMMON COMMENT MISTAKES



The Comment Process is Not a Vote

One well-supported comment is often more effective than a hundred generic emails or form letters. DNR will respond to similar comments as a group.



Comments Not Specific to Proposal

Read and understand the proposal you are commenting on. Make sure the comment is relevant to the issue or action the DNR is proposing.



Comments Beyond DNR’s Authority

You may have a great suggestion to improve Iowa’s air, but it may not be within the authority granted to DNR by the legislature or Governor. The DNR is unable to address issues regarding odor, noise, light pollution and other factors not regulated under federal or state air quality standards.

READY TO MAKE YOUR VOICE HEARD?

Stay informed by signing up for DNR’s Air Quality Technical listserv. Check the [public participation page](#) regularly to learn about opportunities to become involved and make public comments.

Comment periods and public hearings provide opportunities for you to comment. DNR will not present information or answer questions during the formal part of a public hearing—that’s for your input. However, there may be time for questions before or after the hearing. Your voice improves DNR decisions through public notice and comment.

Iowa has made tremendous progress toward [improving statewide air quality](#) in the last 25 years. Together we can ensure Iowa’s air quality for the future.

Training Checklist

The following checklist is a list of training for the first two (2) months of employment. The list will be updated as needed.

Week 1	<ul style="list-style-type: none"> <input type="checkbox"/> With mentor assistance get safety shoes, hard hat, & safety glasses <input type="checkbox"/> Schedule a facility outreach visit with CP staff <input type="checkbox"/> Review department website www.iowacleanair.gov <p>Assignment:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Register/Review/Complete APTI SI422 - Air Pollution Control Orientation Course <input type="checkbox"/> Begin review of IAC rules Chapters 20, 22.1 – 22.99, 23, 25, 31, and 33
Week 2	<ul style="list-style-type: none"> <input type="checkbox"/> Discuss with mentors the scope of the Department’s air quality rules <input type="checkbox"/> Review Construction permit application forms and instructions <input type="checkbox"/> Review example of completed forms (completeness review example) <p>Assignment:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Register/Review/Complete SI460 – Introduction to Permitting <input type="checkbox"/> Register/Review/Complete RE100 (module 1-4) – Basic Concepts in Environmental Sciences <input type="checkbox"/> Start review of Construction Permit Manual <input type="checkbox"/> Continue review of IAC rules <input type="checkbox"/> Begin reading EPA’s <u>NSR Workshop Manual</u> (chapters A, H, and I)
Week 3	<ul style="list-style-type: none"> <input type="checkbox"/> Discuss with mentors the Construction permit application forms and instructions. <input type="checkbox"/> Discuss EPA’s <u>NSR Workshop Manual</u> with mentors <p>Assignment:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Register/Review/Complete RE100 (modules 5-7) – Basic Concepts in Environmental Sciences <input type="checkbox"/> Register/Review/Complete SI413 – Control of Particulate Matter Emissions <input type="checkbox"/> Register/Review/Complete SI431 - Air Pollution Control Systems for Selected Industries <input type="checkbox"/> Review “Estimation of Emissions” guide that is provided with Form EC <input type="checkbox"/> Continue review of CP Manual
Week 4	<ul style="list-style-type: none"> <input type="checkbox"/> Discuss with mentors the CP manual <input type="checkbox"/> Review Other References (see list on next page) <p>Assignment:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Review/Complete SI482 (Chapters 1 through 3, and 13) – Sources and Control of Volatile Organic Air Pollutants <input type="checkbox"/> Start review of Example Project #1 (basic)

Week 5	<ul style="list-style-type: none"> <input type="checkbox"/> Discuss with mentors your review of Example Project #1 <input type="checkbox"/> Discuss with mentors the CP manual <input type="checkbox"/> Schedule facility inspection with FO5 staff <p>Assignment:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Start review of Example Project #2 (stack testing) <input type="checkbox"/> Review stack testing methods (see list on next page)
Week 6	<ul style="list-style-type: none"> <input type="checkbox"/> Discuss with mentors your review of Example Project #2 <input type="checkbox"/> Begin work on first CP project <input type="checkbox"/> Discuss stack testing with lead stack tester <input type="checkbox"/> Schedule facility stack test observation with stack testing staff <p>Assignment:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Take Effective Permit Writing class from senior engineering staff
Week 7	<ul style="list-style-type: none"> <input type="checkbox"/> Continue work on CP projects <input type="checkbox"/> Review Form MD and Reference Guide for CP Engineers <p>Assignment:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Discuss Form MD and modeling process with lead dispersion modeler <input type="checkbox"/> Register/Review/Complete APTI SI423 Precursor Materials for Air Pollution Dispersion Models-AERMOD
Week 8	<ul style="list-style-type: none"> <input type="checkbox"/> Discuss with mentors your review of Example Project #3 <input type="checkbox"/> Continue work on CP projects <input type="checkbox"/> Schedule meetings with Supervisors of each AQB section and attend a meeting with each AQB section <p>Assignment:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Start review of Example Project #3 (modeling) <input type="checkbox"/> Register/Review/Complete SI-437: Module 7 - Fabric Filters <input type="checkbox"/> Register/Review/Complete SI-437: Module 6 – Wet Scrubbers

Week 4 - list of References:

- Air Pollution Engineering Manual – Provided to you in your cube.
- Iowa Administrative Code: <https://www.legis.iowa.gov/law/administrativeRules/agencies>
- Iowa DNR Air Quality: <http://www.iowadnr.gov/Environmental-Protection/Air-Quality>
- DocDNA: https://dnal.documentdna.com/index.jsp?URL_CONTEXT=/iowadnr
- AP-42: <https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emission-factors>
- WebFIRE fire: <https://cfpub.epa.gov/webfire/>
- Stack Test Login: <https://programs.iowadnr.gov/stacktest/pages/home>
- FO Compliance Database: <https://programs.iowadnr.gov/focomp/>
- 40 CFR
 - eCFR: <https://www.ecfr.gov/cgi-bin/text-idx?gp=&SID=9844abdab93db2d7bbf5377f966b519e&mc=true&tpl=/ecfrbrowse/Title40/40CIs-ubchapC.tpl>
 - Cornell law: <https://www.law.cornell.edu/cfr/text/40/chapter-I/subchapter-C>
- EPA Technical Air Pollution Resources: <https://www.epa.gov/technical-air-pollution-resources>
- APTI, EPA, and CenSARA classes: <https://epaapti.csod.com/client/epaapti/default.aspx>
- EPA website of NESHAPs: <https://www.epa.gov/stationary-sources-air-pollution/national-emission-standards-hazardous-air-pollutants-neshap-9>
- EPA website of NSPSs: <https://www.epa.gov/stationary-sources-air-pollution/new-source-performance-standards>
- NSPS (from Texas): <https://www.tceq.texas.gov/permitting/air/rules/federal/60/60hmpg.html>
- NESHAP (from Texas): <https://www.tceq.texas.gov/permitting/air/rules/federal/63/63hmpg.html>
- Applicability Determination Index (ADI): <https://cfpub.epa.gov/adi/>
- Conversions: <http://www.onlineconversion.com/>
- Standard Industrial Classification (SIC) System: <https://www.osha.gov/pls/imis/sicsearch.html>
- North American Industry Classification System (NAICS): <https://www.naics.com/search/>

Week 5 – List of test Methods:

Opacity – 40 CFR 60, Appendix A, Method 9; 40 CFR 60, Appendix A, Method 22
PM/PM10/PM2.5 – 40 CFR 60, Appendix A, Method 5; 40 CFR 51 Appendix M Method 202; 40 CFR 51, Appendix M, 201A with 202
VOC/HAP – 40 CFR 63, Appendix A, Method 320; 40 CFR 60, Appendix A, Method 18; 40 CFR 60, Appendix A, Method 25
SO₂ – 40 CFR 60, Appendix A, Method 6C
NO_x – 40 CFR 60, Appendix A, Method 7E
CO – 40 CFR 60, Appendix A, Method 10

Supplemental APTI Courses (should you feel additional information is necessary):

- SI409 – Basic Air Pollution Meteorology
- SI418 – Control of NO_x Emissions
- SI412B - Electrostatic Precipitator Plan Review
- SI437 - Air Pollution Control Technology Series (additional information to SI431)
- SI473A – Beginning Environmental Statistical Techniques
- SI474 – Introduction to Environmental Statistical Techniques

- SI476B - Continuous Emission Monitoring Systems – Operation & Maintenance of Gas Monitors

EPA Training Suggestions

May 19, 2021

Background

There is a long list of classes Air Pollution Training Institute (APTI), National Air Compliance Training (NACT), and Self-Instructional (SI) classes that can be found on EPA's Learning Management System (LMS). The problem is not with the types of classes offered, but with the content as many of these courses have not been updated in years and much of the information is out of date plus the way the information is presented needs to be modernized.

In addition, staff also have access to Central States Air Resource Agencies (CenSARA) classes and some of these classes overlap with the NACT and APTI classes. If possible, it would be good to combine some of these classes to become more efficient and save resources. Also, it can provide more consistent training to everyone.

Besides updating the content and modernizing the presentation materials, the biggest area of need is training on various National Emission Standards for Hazardous Air Pollutant (NESHAP) standards. NESHAP training is not only important for permitting staff, but inspectors, companies, the public, etc. Using NESHAP rules as an example, EPA should consider training on every new rule/regulation it develops because permit writers are too often trying to figure out what EPA meant by certain conditions, has to then ask EPA, and wait for a response which can delay permit issuance. Add in the possibility of a different agency making a different determination and confusion is the result for agencies and stakeholders.

It should be noted, EPA made a strong first step with its new training course "Setting Enforceable Potential to Emit (PTE) Limits in New Source Review Permits" (APTI SI-NSR201; October 2020) and its announcement of future mini courses on NSR. There are likely ways to simplify and improve the course, which is true of any training materials, but it is a great way to start providing updated and important content on Air Quality issues.

Following are the suggestions taking these factors into consideration:

First Level of Classes to be Updated

The most important thing for any training program is to lay a solid foundation. Therefore, the first three classes to be updated would be the Introduction to Air Quality, Air Pollution Control Basics, and Effective Permit Writing Classes. The reasons are provided below:

(1) Introduction to Air Quality

This would be a new class combining APTI 452 (Principles and Practices of Air Pollution) and 101 CenSARA (Clearing the Air). The class would be an entry level course that would explain the history of air pollution, the history of the Clean Air Act, other laws and regulations related to air pollution, the types of air pollution, the impacts of air pollution, dispersion modeling basics, measurement and control equipment basics, the roles of EPA and state/local agencies, the rulemaking process, and current air pollution topics

REASON: Having a strong foundation is the most important thing any of us can have in anything we do so having a high-quality and informative introductory class is one of the most important things that can be provided to anyone starting in air quality. The class may have to be 3 – 4 days in order to cover so much material, but it is important to give new employees and even experienced veterans looking for a refresher the best information available.

(2) Air Pollution Control Devices Basics

This would replace NACT #299 (Air Pollution Control Devices) which is described as an “*introduction to air pollution control equipment and methods used to control particulate and gaseous air emissions.*”

This course is a good idea, but needs to be updated with current information on various types of control equipment. The course shouldn't spend too much time on individual types of control as there are specific classes for baghouses, ESPs, etc. It should talk about the theory of various control devices, but not too much as that can be handled in the specific classes. The control types the class should discuss should be for the various pollutants like particulate (PM/PM₁₀/PM_{2.5}), SO₂, NO_x, VOC, CO, mercury, GHGs, etc. Also, it would be good to provide information on where people can find the most up-to-date information on various control technologies in order to stay current.

REASON: This is another class that is important in setting a strong foundation for people working in air pollution. We need to ensure to discuss the most important control technologies of the day with the most current information. It won't be possible to talk about every type of control device, but it is important to talk about the pollutants we deal with and their most common control measures. Classes on individual control measures can go into more detail.

(3) Effective Permit Writing

This would replace NACT #334 (Permit Practices). It can be done as a combination intro and intermediate effective permit writing. The class should cover why we write permits, the types of air quality permits, proper language to use in a permit, formatting of permits, and how to read a permit. It should also cover how to review an application, the types of requirements to put in a permit, and how to write a proper permit writer evaluation.

REASON: This goes along the whole theme of a strong foundation. All of us in the air quality arena have to deal with permits whether it is writing, reading, or enforcing them. Therefore, it is fundamental to our jobs that we have a class that gives everyone a strong background in permitting.

Second Level of Classes to be Updated:

After that first group the next collection of classes that need to be updated are the ones related to common industry types, control equipment types, and measurement techniques. This group includes:

- **APTI 413 (Control of Particulate Emissions)** [NOTE: combine with NACT 281 (ESPs) and NACT 282 (Baghouses)]
- **APTI 418 (Controls of NO_x Emissions)**
- **APTI 482 (Sources and Control of VOC Air Pollutants)** [NOTE: combine with NACT 284 (VOC Control Devices)]
- **APTI 415 (SO₂ controls)** [NOTE: the class is currently for gaseous emissions, but no reason to have it cover all gaseous pollutants since there is already a class on NO_x and one on VOCs]
- **APTI 427 (Combustion Evaluation)**
- **APTI 474 (Continuous Emission Monitoring)** [NOTE: Combine with NACT 221 (Continuous Emission Monitoring)]
- **APTI 468 (Stack Testing)** [NOTE: Combine with NACT 224 (Observing Source Tests)]
- **APTI 470 (Quality Assurance)**
- **NACT 290 (MACT Basics)**
- **CenSARA 210 (Technical Writing)**
- **CenSARA 220 (Public Relations and Risk Communications)**

These are all foundation type classes to help people understand air pollution. As you will note, there is a suggestion to combine some of the classes. There may be ones that were missed, but the idea is to avoid

redundancy in classes. This will make it more efficient as presentations will not have to be maintained for multiple classes that cover the same basic materials. The Technical Writing Class should be updated to have students actually write documents as the best way to become a better writer is to actually write.

Third Level of Classes to be Updated:

These are the industry specific classes that need to be updated after the foundational classes have been updated:

- **NACT 245 (Cement Plants)**
- **NACT 246 (Aggregate, Concrete, and Hot Mix Asphalt Plants)** [NOTE: combine with NACT 242 (Hot Mix Asphalt Facilities), NACT 243 (Aggregate Plants), and NACT 244 (Concrete Batch Plants)]
- **NACT 271 (Stationary Reciprocating Engines)**
- **NACT 273 (Industrial Boilers)**
- **NACT 270 (Incinerators)**
- **NACT 272 (Power Plants)**

These are the most common types of facilities we deal with in Iowa. You will note some of these classes have been combined to avoid the redundancy. The idea is that these classes would cover not only the fundamentals of how these operations work, but also the regulations that apply. Too often these classes don't go into enough detail on the regulations.

Suggested Classes to Develop

There are several areas to look at for the development of new classes. The biggest area is on classes specific to individual regulations. Those classes in order are:

(1) New Source Review/BACT Workshop

NOTE: There are NSR/PSD classes available from private companies, but EPA does not seem to be involved in them. Maybe EPA doesn't need to develop these classes, but it would be very helpful to have EPA staff attend these classes to ensure information being provided correctly reflects EPA's interpretations.

Also, several Iowa DNR staff attended a workshop specifically designed for BACT review, but it is not clear if this workshop is still available or just part of the NSR classes. A separate BACT class could still have value.

(2) National Emission Standards for Hazardous Air Pollutants (NESHAP) training

- (a) Subpart FFFF [Miscellaneous Organic Chemical Manufacturing (MON)]
- (b) Hazardous Organic NESHAPs (Subparts F, G, H, and I)
- (c) Surface Coating NESHAPs
- (d) Boiler and Utility NESHAPs
- (e) Pharmaceutical NESHAP

(3) Communication

NOTE: All of us can become better communicators which includes writing. The better we are at communication the better we can become at Public Relations and Risk Communication. Some of the things that need to be covered are presentation skills, communicating with the public, understanding how to write for different groups, etc.

(4) GHGs/Global Warming/Climate Change

(5) Wet & Dry Scrubbers

NOTE: Scrubbers can be used for particulates or gasses. The class could cover the types of scrubbers and their theory along with the proper uses.

(6) Seed Oil Extraction Processing

(7) Grain Processing (Examples: Wet vs. Dry Corn Mill Operations, Oats Processing, etc.)

(8) Ethanol Plants

(9) Nitrogen Fertilizer Processing

Stationary Source Determinations

BACKGROUND:

One question that continues to come up in permitting is “*What is a single stationary source?*” This question is occurring more and more as companies do some of the following to improve their business practices:

- Outsource some operations (i.e. boiler operation, painting, backup generators, etc.). These operations could be at their own building or at another nearby site.
- Move some operations to an existing building nearby rather than build a new building on existing property.
- Partner with another company to produce a new product.
- Have subsidiaries of the same parent company locate on property owned by the parent company.

The Prevention of Significant Deterioration (PSD) and Title V regulations apply to “*major stationary sources*” as defined in their individual regulations. The National Emission Standards for Hazardous Air Pollutants (NESHAP) applies to “*major sources*” and “*area sources*” as defined in its regulations. In all of these cases the regulations refer back to the definition of “*stationary source*”.

The definition of “*stationary source*” is very similar for all of these regulations:

- PSD:
“*Stationary source*” means any building, structure, facility, or installation which emits or may emit a regulated NSR pollutant. 567 IAC 33.3(1).
- Title V:
“*Stationary source*” means any building, structure, facility, or installation that emits or may emit any regulated air pollutant or any pollutant listed under Section 112(b) of the Act. 567 IAC 22.100.
- NESHAP:
Stationary source means any building, structure, facility, or installation which emits or may emit any air pollutant. 40 CFR §63.2.

A closer review of the regulations shows the criteria used for each regulation in determining a stationary source:

- PSD:
“*Building, structure, facility, or installation*” means all of the pollutant-emitting activities which belong to the same industrial grouping, are located on one of more contiguous or adjacent properties and are under the control of the same person (or persons under common control) except the activities of any vessel. Pollutant-emitting activities shall be considered as part of the same industrial grouping if they belong to the same major group (i.e., which have the same two-digit code) as described in the Standard Industrial Classification Manual, 1972, as amended by the 1977 Supplement (U.S. Government Printing Office stock numbers 4101-0066 and 003-005-00176-0, respectively). [567 IAC 33.3(1)]
- Title V:
“*Major source*” means any stationary source (or any group of stationary sources located on one or more contiguous or adjacent properties and under common control of the same person or of persons under common control) belonging to a single major industrial grouping that is any of the following:
 1. A major stationary source of air pollutants, as defined in Section 302 of the Act...
 2. A major stationary source of air pollutants according to Section 112 of the Act...
 3. A major stationary source as defined in Part D of Title I of the Act...(567 IAC 22.100)

- NESHAP:
Major source means any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit...

and

Area source means any stationary source of hazardous air pollutants that is not a major source as defined in this part.
(40 CFR §63.2)

Based on these definitions, there are three (3) criteria for a single stationary source for PSD and Title V are:

- Same 2-digit Standard Industrial Classification (SIC) code,
- Common control, and
- On contiguous or adjacent properties.

For the purposes of the NESHAP program there are only two (2) criteria:

- Common control and
- Located within a contiguous area

EPA has never provided definitions for any of these criteria. However, EPA has provided numerous guidance documents in the form of case-by-case determinations to help agencies in making single stationary source decisions.

The Department often needs to make single stationary source determinations. Most of these determinations are for either PSD or NESHAP purposes. In order to reduce the amount of time needed to make these case-by-case determinations the Department has developed a list of questions based on EPA guidance that, at a minimum, must be answered by the company or companies involved along with any supporting documentation. The Department may still request additional information, but by providing answers to these questions an applicant(s) will reduce the majority of back and forth the Department encounters during its review of the case-by-case single stationary source determinations.

These questions are based on EPA's guidance documents and letters. The questions are grouped under the specific criteria. There is a brief explanation given under each of the criteria so an applicant has a better understanding of what the Department is looking for and why the question is being asked. The questions are not an exhaustive list, but a very good screening tool.

Some of the questions may repeat as it may cover two (2) or more of the criteria. The reason for this is that the questions may not have to be answered for all of the criteria as it is often the case that only one of the criteria is in question. For example, the two (2) operations could have the same owner and 2-digit SIC code so the only question would be concerning whether the operations are contiguous or adjacent. If this is the case an applicant would only need to answer the questions under the heading of "contiguous or adjacent". In other cases all three (3) criteria may be in question and then an applicant would answer all of the questions.

QUESTIONS:

General Information:

In order for the Department to gain a better understanding of the operations involved and what each operation does the following questions shall be answered:

- 1) Please describe the nature of the business conducted by each operation.
- 2) Please describe in detail the manner in which either of the two (2) operations supports or contributes to the output or production which occurs at the other operation.

Common Control:

EPA's regulations which the Department has adopted do not provide a definition for "*common control*". Webster's Ninth New Collegiate Dictionary defines control as:

- "to exercise restraining or directing influence over: Regulate"
- "to have power over: Rule"
- "an act or instance of controlling; *also*: power or authority to guide or manage"
- "the regulation of economic activity esp. by government directive"

Obviously common ownership constitutes common control. However, common ownership is not the only evidence of control. EPA has used three (3) types of mechanisms for establishing common control. Those mechanisms are:

- Ownership of multiple operations by the same parent corporation or by a parent and a subsidiary of the parent corporation.
- One entity has the power to direct the management and policies of a second entity, thus controlling the operations through a contractual agreement or a voting interest.
- There is a contract for service relationship between the two (2) operations or if a support/dependency relationship exists between the two (2) operations.

In 2018, EPA came out with new guidance interpreting the second item above to controlling the air pollution control operations instead of the production operations (Meadowbrook letter). Therefore, in order to make a determination on common control the following information is required:

- 1) Please state whether the operations are commonly owned or share common ownership in any way.
- 2) Please detail the current management structure of each operation. A flowchart is acceptable. Please identify the following:
 - Details from CEO & Board of Directors down to the Plant Manager
 - Any common CEO(s)
 - Any common Board of Directors members
 - Any other common manager such as Plant Manager, Environmental Manager, etc.
 - Any managers that at one time were shared by the two (2) operations.
 - Any manager or other person in a decision making capacity that is responsible to the same third parties or to third parties who are mutually owned or directed by the same parent or subsidiary owners, by partial owners or by voting stockholders.
- 3) Please identify whether common workforces or security forces are now or ever have been shared by these two (2) operations.
- 4) Please identify any equipment, control equipment or other property is now or ever has been shared by the two (2) operations.

- 5) Please state whether these two (2) operations share now or ever have shared common payroll activities, employee benefits, health plans, retirement funds, insurance coverage, or other administrative functions.
- 6) Is there a contract or type of agreement, in writing or otherwise, between the two (2) operations?
 - If there is a written agreement please provide a copy to the Department.
 - The following questions are required to be answered in regards to any agreements between the two (2) operations:
 - What do any agreements between the two (2) operations specify with regard to pollution control responsibilities at the two (2) operations?
 - Can the managing entity of one of the operations make decisions that affect pollution control at the other operation?
 - Who accepts the responsibility for compliance with air quality control requirements and for violations at the two (2) operations?
 - Can either of the two (2) operations purchase raw materials from or sell products or byproducts to customers other than the other operation?
 - What are the arrangements for providing goods and services?
 - What are the financial arrangements between the two (2) operations?
 - What is the timeframe of any existing contractual or leasing relationships between the two (2) operations?
 - Is either operation responsible for legal duties of the other?
 - Is either of the operations restricted by the other operation or due to its relationship with the other operation from contracting with a third party to perform work for third parties?
- 7) Please state whether a change in the production levels at either one of the operations could or would influence the production or operational levels at the other operation.
- 8) Please identify any administrative order or other governmental directive (such as a court order) that dictates the control or independence of either of the two (2) operations or any other similarly situated operations owned by either of these two (2) operations. Please attach copies of any relevant orders or other governmental directives.
- 9) If either of the operations were to shut down, please state any limitations on the other facility to pursue outside business interests.
- 10) Please state whether either of these operations is now or ever has been owned or otherwise controlled, in whole or in part, by the other operation or both an owner thereof. If so, please state the nature of the control and the beginning and ending dates.
- 11) Please disclose any interest, actual or prospective, that either of these operations has in property, equipment, or other assets that the other operation possesses, requires, or uses for the operation of its business.
- 12) Is the primary relationship between the two (2) operations that of tenant-landlord or lessor-lessee?

SIC Code:

Each individual emission unit at a plant can be assigned an SIC code. According to the August 7, 1980 Federal Register (FR) preamble for the PSD regulations it was EPA's opinion:

"...the December opinion of the court in *Alabama Power* sets the following boundaries on the definition for PSD purposes of the component terms of "source": (1) it must carry out reasonably the purposes of PSD; (2) it must approximate a common sense notion of "plant"; and (3) it must avoid aggregating pollutant-emitting activities that as a group would not fit within the ordinary meaning of "building," "structure," "facility," or "installation." 45 FR 52694.

EPA believed the two (2) digit SIC categories were narrow enough to separate sets of activities into common sense groupings, but also broad enough to minimize the likelihood of artificially dividing a set of activities that does constitute a “plant” into more than one (1) group.

In the August 7, 1980 preamble EPA further detailed its assigning of SIC codes for the purposes of PSD. It stated:

“Each source is to be classified according to its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Thus, one source classification encompasses both primary and support facilities, even when the latter includes units with a different two-digit SIC code. Support facilities are typically those which convey, store, or otherwise assist in the production of the principal product. Where a single unit is used to support two otherwise distinct sets of activities, the unit is to be included within the source which relies most heavily on the support. For example, a boiler might be used to generate process steam for both a commonly controlled and located kraft pulp mill and plywood manufacturing plant. If the yearly boiler output is used primarily by the pulp mill, the total emissions of the boiler should be attributed to the mill.” 45 FR 52695

So even though some equipment/emission units within a facility may not have the same 2-digit SIC code the emissions from those operations cannot be excluded if they assist in the production of the primary product. A classic example are boilers as boilers can supply steam and/or electricity to a company, but utility type operations have their own 2-digit SIC code. Since the steam and electricity are used to assist in the production of a product a company must consider its boilers as part of the stationary source even though the 2-digit SIC code is different. This concept is true for all operations and not just boilers. Some other common examples are painting operations and grain receiving & handling equipment.

SIC codes can be viewed at <http://www.osha.gov/oshstats/sicscr.html>. The process for identifying the 2-digit SIC code at an operation is:

- *Step 1 – Identify the primary activities at the site:* the primary activity is determined based on the services rendered or the principal product or group of products produced or distributed. There may be more than one primary activity and each primary activity is considered a separate source.
- *Step 2 – Identify any emission units at the site that could be classified 2-digit SIC code different than that of the primary activity.*
- *Step 3 – Assess the role of each of these units:* Units that convey, store, or otherwise assist in the production of the principal product are considered part of the primary activity. If the unit is used for multiple activities then an assessment is required to determine which activity the unit is assigned.

In order to make the assessment on the 2-digit SIC code the following questions are required to be answered:

- 1) What is the two (2) digit SIC code(s) for each operation?
- 2) Please list all emission units with a different 2-digit SIC code than that stated in Question 1 along with its 2-digit SIC code.
- 3) Please detail the role of each emission unit in Question 2.
- 4) Please state whether any goods, including but not limited to raw materials or products (finished or unfinished) are transferred between the two (2) operations on a routine or occasional basis. For each instance of transfer, please describe the goods transferred, the frequency of transfer, and the method of transfer (for example: truck, conveyor belt, pipe system, etc.).

- 5) Please state whether the operations now or ever have shared intermediates, products, byproducts, or other manufacturing equipment.
- 6) Please state whether either of these operations conducts business with any entity other than the other operation. For each operation, state the percentage of business transacted with other entities.
- 7) Please state whether either of the two (2) operations purchases any of its raw materials or other products from the other operation. If the answer is yes, then please state the raw materials or other products purchased, and the history of such purchases.

Contiguous or Adjacent:

The issue of “*contiguous or adjacent*” tends to be the most controversial of the three (3) criteria. The reason for the controversy is not just the fact that EPA has not defined the terms, but also because the guidance is all over the board. One will find determinations where 50 miles was considered to be contiguous/adjacent and then other decisions where less than 5 miles was not contiguous/adjacent.

The terms “*contiguous*” and “*adjacent*” are defined in Webster’s Ninth New Collegiate Dictionary as:

- Contiguous
 - “being in actual contact: touching along a boundary or at a point”
 - “*of angles*: adjacent”
 - “next or near in time or sequence”
 - “touching or connected throughout in an unbroken sequence”
- Adjacent
 - “not distant: nearby”
 - “having a common endpoint or border”
 - “immediately preceding or following”

Webster’s goes on to state that *adjacent*, *contiguous*, *adjoining*, and *juxtaposed* are synonyms and mean in close proximity. This leads to the inevitable question of “What does EPA consider close proximity?”. EPA has not defined this other than to say the question of “*contiguous or adjacent*” is a case-by-case determination and is not be judged on physical distance alone as that is only one (1) factor. The question really becomes whether the operations are close enough to act as one operation. In order to make this determination the following questions are required to be answered:

- 1) Do these operations share a common boundary?
- 2) What is the straight line distance (property line to property line) between the two (2) operations?
- 3) Please state whether either of these operations are now or ever have been located on property owned by the other operation or an owner thereof. If the answer is yes, please state the beginning and ending dates of the relationship.
- 4) Please state whether these two (2) operations would have been located, would be located now, and would continue to be located at their present sites if the other facility were not situated at its location.
- 5) If the facilities were sited further apart, would that significantly affect the degree to which they might be dependent on each other?
- 6) Please state whether the operations now or ever have shared intermediates, products, byproducts, or other manufacturing equipment.

- 7) Please state whether any goods, including but not limited to raw materials or products (finished or unfinished) are transferred between the two (2) operations on a routine or occasional basis. For each instance of transfer, please describe the goods transferred, the frequency of transfer, and the method of transfer (for example: truck, conveyor belt, pipe system, etc.).
- 8) Please state whether a change in the production levels at either one of the operations could or would influence the production or operational levels at the other operation.



Memorandum

TO: Christopher A. Roling, CPM, MPA, PE

C:

FROM:

DATE:

RE:

Background:

[Provide background brief background on the companies/sites involved such as their plant numbers, addresses, and their request (i.e. TV, PSD, NESHAP, etc.)]

Single Source Discussion:

[What are they requesting for a determination?]

- *Common Control*

In the past, EPA used three (3) types of mechanisms for establishing common control. Those mechanisms are:

- (1) Ownership of multiple sources by the same parent corporation or by a parent and a subsidiary of the parent corporation.
- (2) One entity has the power to direct the management and policies of a second entity, thus controlling the operations through a contractual agreement or a voting interest.
- (3) There is a contract for service relationship between the two (2) companies or if a support/dependency relationship exists between the two (2) companies.

In 2018, EPA came out with new guidance interpreting the second item above to controlling the air pollution control operations instead of the production operations (i.e. Meadowbrook letter).

[Provide analysis of the companies/sites and whether there is common control based on the regulations and EPA's guidance. This does include your proposed determination on common control. You may need to obtain contracts between the companies and have Legal review them to make this determination.]

- *SIC Code*

Each individual emission unit at a plant can be assigned an SIC code. According to the August 7, 1980 Federal Register (FR) preamble for the PSD regulations it was EPA's opinion:

"...the December opinion of the court in Alabama Power sets the following boundaries on the definition for PSD purposes of the component terms of "source": (1) it must carry out reasonably the purposes of PSD; (2) it must approximate a common sense notion of "plant"; and (3) it must

avoid aggregating pollutant-emitting activities that as a group would not fit within the ordinary meaning of “building,” “structure,” “facility,” or “installation.” 45 FR 52694.

EPA believed the two (2) digit SIC categories were narrow enough to separate sets of activities into common sense groupings, but also broad enough to minimize the likelihood of artificially dividing a set of activities that does constitute a “plant” into more than one (1) group.

In the August 7, 1980 preamble EPA further detailed its assigning of SIC codes for the purposes of PSD. It stated:

“Each source is to be classified according to its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Thus, one source classification encompasses both primary and support facilities, even when the latter includes units with a different two-digit SIC code. Support facilities are typically those which convey, store, or otherwise assist in the production of the principal product. Where a single unit is used to support two otherwise distinct sets of activities, the unit is to be included within the source which relies most heavily on the support. For example, a boiler might be used to generate process steam for both a commonly controlled and located kraft pulp mill and plywood manufacturing plant. If the yearly boiler output is used primarily by the pulp mill, the total emissions of the boiler should be attributed to the mill.” 45 FR 52695

So even though some equipment/emission units within a facility may not have the same 2-digit SIC code the emissions from those operations cannot be excluded if they assist in the production of the primary product. A classic example are boilers as boilers can supply steam and/or electricity to a company, but utility type operations have their own 2-digit SIC code. Since the steam and electricity are used to assist in the production of a product a company must consider its boilers as part of the stationary source even though the 2-digit SIC code is different. This concept is true for all operations and not just boilers. Some other common examples are painting operations and grain receiving & handling equipment.

SIC codes can be viewed at <https://www.osha.gov/pls/imis/sicsearch.html>. The process for identifying the 2-digit SIC code at an operation is:

- *Step 1 – Identify the primary activities at the site:* the primary activity is determined based on the services rendered or the principal product or group of products produced or distributed. There may be more than one primary activity and each primary activity is considered a separate source.
- *Step 2 – Identify any emission units at the site that could be classified 2-digit SIC code different than that of the primary activity.*
- *Step 3 – Assess the role of each of these units:* Units that convey, store, or otherwise assist in the production of the principal product are considered part of the primary activity. If the unit is used for multiple activities then an assessment is required to determine which activity the unit is assigned.

[Provide discussion and analysis on whether the sites have the same 2-digit SIC code or should be considered to be supporting operations.]

- *Contiguous or Adjacent*

In the past the actual distance between two (2) or more sites was a factor in whether the sites were considered adjacent/contiguous. EPA also looked at the inter-relationship between the sites to see if the sites acted as one (1) source (i.e. did they meet the “*common sense notion of a plant*”) to make a determination. However, that changed with the August 7, 2012 Sixth Circuit Court decision regarding Summit Petroleum Corporation [*Summit Petroleum vs. USEPA*, 690 F.3d 733 at 737 (6th Cir. 2012)]. In that 2-1 decision the majority ruled:

“...activities should be aggregated only if they are located on physically contiguous or adjacent properties.”

The issue of “*contiguous or adjacent*” has always been the most controversial of the three (3) criteria and this court decision did not resolve the controversy. The main reason for the controversy is the fact that EPA has never defined the terms “*contiguous*” and “*adjacent*” in its rules.

The terms “*contiguous*” and “*adjacent*” are defined in Webster’s Ninth New Collegiate Dictionary as:

- ❖ *Contiguous*

- “being in actual contact: touching along a boundary or at a point”
- “*of angles*: adjacent”
- “next or near in time or sequence”
- “touching or connected throughout in an unbroken sequence”

- ❖ *Adjacent*

- “not distant: nearby”
- “having a common endpoint or border”
- “immediately preceding or following”

Webster’s goes on to state that *adjacent*, *contiguous*, *adjoining*, and *juxtaposed* are synonyms and mean in close proximity. So in the past the inevitable question was “*What does EPA consider close proximity?*” EPA never defined this other than to say the question of “*contiguous or adjacent*” is a case-by-case determination and was not to be judged on the physical distance alone as that is only one (1) factor. The question was whether the operations were close enough to act as one operation.

Now the question is “*What does the Court consider close proximity or nearby?*” since distance is the only factor that is to be considered based on the court decision. EPA provided draft guidance in 2018 for sources other than the oil and gas industry as they have a distance requirement in the rule. For all other industries EPA is proposing that agencies should look only at distance and not consider any interactions between sites.

EPA did not say how far apart was too far in the draft guidance document, but did say a dedicated road, conveyor belt and/or piping between the properties could be enough to consider the properties to be considered in close proximity to one another. Finally, EPA said agencies should consider whether sites meet the “*common sense notion of a plant*.” Please note, this last statement by EPA confuses the issue as “*common sense notion of a plant*” is not a distance criteria, but an interaction criteria. The Iowa Air Quality Bureau did comment on the draft guidance document about this apparent contradiction.

[Provide a discussion on why the sites are or are not adjacent/contiguous]

Conclusion:

[Provide your final conclusion on whether the sites/operations are considered one. They could be a single source or multiple sources for all programs or maybe a single source for NESHAP, but not for TV/PSD. Also, they have to meet all of the criteria to be a single source.]

This determination regarding sole source status has been made based on the specific facts addressed in the current case. If the information changes or is incorrect this determination could also change. In addition, this determination shall not be used to bind the Department in any other case.

Questions:

Nature & Extent

Provide a detailed description of the project. This description must list all changes to be made during the project (overhaul of engine). Also, please provide a percentage of the unit that is being repaired or replaced. For this question, please provide a detailed description of what is being done during the overhaul.

The turbine exchange project involves removing the existing engine (gas producer and power turbine) from the skid and exchanging these components with used refurbished parts and some new parts that are like-for-like overhauled components. These are the same parts that would be replaced if the turbine was overhauled in place. There are no physical changes made to the unit. The components come from a third-party's central exchange component fleet. The exchange components are those which have been completely disassembled and inspected for damage, wear, or other signs of deterioration. Repairs are conducted, as necessary, and the components reassembled and tested to ensure original thermodynamic and mechanical performance. The original turbine package, including all auxiliary components and associated systems (control system, fuel system, lubrication system, driven equipment, structure, enclosures, skids, inlet and exhaust ducting, etc.), are reused. No changes, modifications, or upgrades are made during a turbine exchange. It is a like-for-like exchange of the original turbine equipment with exchange turbine equipment of the same make and model with identical horsepower and emission characteristics compared to original turbine design.

Like many engine overhauls the overhaul of this turbine consists of a majority of refurbished parts and consumable parts replaced with new components. This puts the percentage of the unit being repaired or replaced between 40% and 60% depending on component condition.

How long will the project take to complete? The turbine component exchange work normally takes 4 days and is conducted by Northern Natural Gas (Northern) and original equipment manufacturer personnel jointly.

How long is your normal maintenance shutdown period? Northern normally schedules 4 – 7 days to complete the turbine component exchange work, as this work is often combined with other unit maintenance or unit project work.

Are the replacement components of the same design as the components they are replacing? No changes, modifications, or upgrades are made during a turbine exchange. It is a like-for-like exchange of the original turbine equipment with exchange turbine equipment of the same make and model with identical horsepower and emission characteristics compared to original turbine design.

What is done on a shorter-term basis (annual, etc.) to these units and who does this maintenance? For this type of turbine, exchanges routinely are completed approximately every 30,000 hours of run-time consistent with manufacturer's recommendations. Actual turbine run-time is highly variable over time and depends on turbine location, weather, and customer loads. In the case of the turbine located at the Oakland Compressor Station (Oakland), EP-T1, this was the first turbine exchange since the original turbine was installed in 2006. On an annual basis, and in between turbine exchanges, Northern conducts routine preventative maintenance such as air/oil/fuel filter replacements, instrument calibration, internal cleaning, oil sampling, etc. A borescope inspection of the unit is also conducted to assess internal

condition. Other non-routine maintenance such as control module or instrument replacements are conducted on an as needed basis. Northern field operations personnel conduct this work with assistance from a field services representative from the original equipment manufacturer, if required.

How long does it take? Routine annual maintenance typically takes a few days per year.

What percentage of the unit is replaced or repaired. Typically, only very minor and very low cost replacement parts are required on an annual basis in between turbine exchanges such as, but not limited to, filter elements, field instruments, or control modules.

Purpose

Please provide a brief description of why this project is being undertaken at this time. The unit reached the original equipment manufacturer's recommended time for an engine overhaul (30,000 hours). In Northern's experience, turbine reliability is unpredictable past this threshold, and the risk of catastrophic equipment failure and extended unplanned unit downtime increases. Thus, the turbine was exchanged 1) to ensure safe operation of the equipment for Northern's personnel and 2) to ensure reliable and cost effective service to the public.

What was the expected lifetime of the unit (the entire turbine and the core) when it was first installed?

Life expectancy of an entire turbine unit is highly variable depending on a number of factors including historical operating and maintenance practices, environmental factors, industry support, availability of spare parts, etc. It can range anywhere from 30 to 80 years depending on the circumstances so long as the original equipment manufacturers operating, maintenance, and turbine component exchange recommendations are followed.

Will the changes increase availability or reliability of the unit? In Northern's experience, in the absence of conducting the routine, manufacturer's recommended overhaul, turbine reliability is unpredictable past the 30,000-hour operation threshold, and the risk of catastrophic equipment failure and extended unplanned unit downtime increases. Thus, the turbine was exchanged 1) to ensure safe operation of the equipment for Northern's personnel, and 2) to ensure reliable and cost effective service to the public. Northern is conducting industry standard, routine maintenance through completing these overhauls.

Will the changes extend the lifetime of the unit (entire turbine)? There are no physical changes made to the unit. Exchange of the gas producer and power turbine every 30,000 run-hours in accordance with the manufacturer's routine maintenance recommendations is necessary to ensure safe, reliable operation, mitigate risk of significant unplanned downtime, and ensure reliable service to the public.

What was the original maximum rated capacity of the unit? 15,000 Horsepower.

What is the current capacity of the unit? 15,000 Horsepower.

Will the changes restore the unit to its original rated capacity? The design capacity of the current exchange turbine and the original turbine is the same. There are no physical changes made to the unit. The purpose of the overhaul is to return the gas turbine to the original thermodynamic and mechanical performance. Routine overhaul of the modules is a fundamental assumption of the product design.

For combustion units:

What was the original efficiency of the unit? 34.41% design thermal efficiency

What is the current efficiency of the unit? 34.41% design thermal efficiency

Will the changes restore the unit to its original efficiency? The design thermal efficiency of the original turbine and current exchange turbine is the same. There are no physical changes made to the unit. The purpose of the overhaul is to return the gas turbine to the original thermodynamic and mechanical performance. Routine overhaul of the modules is a fundamental assumption of the product design.

Frequency

Gas turbines, like any engine, are designed with requirements for certain maintenance and/or repair activities to maintain the life expectancy of the engine. In accordance with manufacturer's recommendations, one such maintenance/repair activity is to overhaul the gas producer and power turbine modules at ~30,000 operating hour intervals.

Cost

What annual operation and maintenance budget for the unit? Annual operation and maintenance expenses for the Oakland turbine are included within the annual budget for the Oakland facility and surrounding pipeline infrastructure and are not broken out per unit. A very rough estimate for annual operation and maintenance costs for this type of unit between turbine exchanges is approximately \$75,000 per year excluding fuel and utilities.

What is the cost of this project (overhaul of engine)? The estimated cost of the exchange components (gas producer and power turbine) is \$1,938,624. According to the original equipment manufacturer, the replacement of the gas producer and power turbine with exchange components would typically cost 17-32% of comparable new equipment.

Where will the funding from this project come from (i.e. O&M budget or capital expenditure)? Capital

Does your company follow Generally Accepted Accounting Principles (GAAP)? Yes

Is this project being capitalized or expensed? Capitalized - Financial accounting guidance requires that when a plant retirement unit is replaced, the original unit must be retired and the replacement unit capitalized. The exchange of a used turbine with a like-like refurbished/overhauled spare turbine falls under this guidance. Accounting guidance requires that when a retirement unit is overhauled (and NOT replaced), the cost of the overhaul is to be expensed. Though these maintenance expenses may be capitalized or expensed depending on the exact nature of the work in accordance with prevailing accounting rules, maintenance/overhaul work is performed on the exchange turbine in the exact same manner and per the same manufacturer's guidelines in both cases. The only difference is the exchange program allows for a fully overhauled turbine to be ready for immediate installation when the original used turbine is removed, thus reducing down time of the unit to a few days instead of a few months of down time that would otherwise be required to wait for the original turbine to be overhauled and

reinstalled. This substantial reduction in unit down time achieved by turbine exchange versus in place overhaul is necessary for continuity of reliable and cost effective service to the public.

Although this activity is classified as a capital expenditure, it does not result in an increase to the capacity of the unit, and it is Northern's understanding that this does not meet the definition of modification under NSPS.

What is the cost of overhauling this engine compared to buying a new one? The estimated cost of the exchange components (gas producer and power turbine) is \$1,938,624. If the same gas producer and power turbine were purchased outright as new components, independent of an exchange, the cost would be approximately \$5,500,000 (35%). According to the original equipment manufacturer, the replacement of the gas producer and power turbine with exchange components would typically cost 17-32% of comparable new equipment.

Since the costs for the turbine overhaul does not exceed 50% of the costs to install a new turbine, Northern understands that this does not meet the definition of reconstruction under NSPS.

What is the cost of the engine compared to the overall turbine unit? The estimated cost of the exchange components (gas producer and power turbine) is \$1,938,624. If the existing Oakland turbine including all auxiliaries, supporting systems, and infrastructure were entirely replaced, the cost would exceed \$26,000,000.

ENGINEERING EVALUATION

Date: October 29, 2020

Project Number: 20-115

Plant Number: 78-04-006

Field Office: 4

Determination

Facility: Northern Natural Gas Company- Oakland Compressor Station

Project Description:

The Department received an applicability determination request from Northern Natural Gas Company for their Oakland Compressor Station on April 21, 2020. This was a determination for NSPS subparts GG and KKKK (Standards of Performance for Stationary Combustion Turbines) concerning a turbine core changeout performed at the Oakland Compressor Station. Specifically, the facility requested a determination on whether this changeout is considered routine maintenance, repair and replacement (RMRR) activities under the NSPS regulations.

It is the Department's opinion that the turbine change-out project is not considered routine maintenance, repair or replacement under the NSPS regulations. The determination along with supporting justification is given below.

Discussion

As noted in the request, a turbine at the Oakland Compressor Station was exchanged with an existing like-for-like overhauled unit. Based on the information supplied to the Department; the project included the following:

“The turbine exchange project involves removing the existing engine (gas producer and power turbine) from the skid and exchanging these components with used refurbished parts and some new parts that are like-for-like overhauled components. These are the same parts that would be replaced if the turbine was overhauled in place. These are the same parts that would be replaced if the turbine was overhauled in place. There are no physical changes made to the unit. The components come from a third-party's central exchange component fleet. The exchange components are those which have been completely disassembled and inspected for damage, wear, or other signs of deterioration. Repairs are conducted, as necessary, and the components reassembled and tested to ensure original thermodynamic and mechanical performance. The original turbine package, including all auxiliary components and associated systems (control system, fuel system, lubrication system, driven equipment, structure, enclosures, skids, inlet and exhaust ducting, etc.), are reused. No changes, modifications, or upgrades are made during a turbine exchange. It is a like-for-like exchange of the original turbine equipment with exchange

turbine equipment of the same make and model with identical horsepower and emission characteristics compared to original turbine design.”

In the request, Northern Natural Gas requested that the Iowa DNR concur with the opinion that this activity is considered RMRR, and thus not considered a modification under the NSPS regulations.

Under the NSPS regulations any physical changes or changes in method of operations must be reviewed. The definition of modification under the New Source Performance Standards (NSPS) is:

“any physical change in, or change in the method of operation of, a stationary source which increases the amount of any air pollutant emitted by such source or which results in the emission of any air pollutant not previously emitted.” (see 40 CFR 60.2)

However, an activity that is considered RMRR is not considered a modification (see 40 CFR 60.14(e)(1)).

“Maintenance, repair, and replacement which the Administrator determines to be routine for a source category, subject to the provisions of paragraph (c) of this section and §60.15.”

The NSPS regulations do not specify the kinds of activities included as RMRR. Rather, eligibility for the RMRR exemption is determined based on a case-by-case analysis, "weighing the nature, extent, purpose, frequency, and cost of the proposed work, as well as other relevant factors, to arrive at a common-sense determination." This review process is based on EPA's longstanding guidance affirmed through a number of court cases. See the attached Department Memo labeled Routine Maintenance, Repair, and Replacement for a list of these cases.

It should be noted, EPA has stated in previous opinions that the routine activity exception has a narrow scope and should generally be applied only to actions that are regular, frequent, inexpensive, or done for the purpose of maintaining the facility in its present condition. See the September 9, 1988 Memorandum from Don R. Clay, Acting Assistant Administrator for Air and Radiation to David A. Kee, Director, Air and Radiation Division, Region V (Clay Memorandum) at page three, states that the clear intent of the PSD regulations is to construe "physical change" very broadly, to cover virtually any significant alteration to an existing plant and to interpret the exclusion related to routine maintenance, repair and replacement narrowly.

After carefully reviewing all the information submitted in light of the relevant factors, IDNR determined that the turbine core changeout is not routine. A review of the four factors used to make this determination is given below.

In most cases engine core changeouts are not considered a modification under NSPS because there is not an increase in emissions. In these cases, it would not be a modification because there is not an increase in the amount of any air pollutant emitted by the source or which results in the emission of any air pollutant not previously emitted. In this case, however, there was an increase in emissions, causing it to be a modification under NSPS. And, as was determined here, a turbine core changes out cannot be considered RMRR to exclude it as a modification.

Nature & Extent

Based on the information supplied, the turbine core exchange project required extensive changes. In this project, the entire gas producer and turbine sections were replaced or repaired. As noted, this results in between 40% and 60% of the unit being modified. This differs from the regular maintenance done on an annual or as needed basis, and in between turbine exchanges, such as air/oil/fuel filter replacements, instrument calibration, internal cleaning, oil sampling, etc. Also, in this case, this was the first turbine exchange since the original turbine was installed in 2006. Replacing up to 60% of the unit is much more extensive than the regular maintenance done on the unit annually. Hence, the turbine core replacement is much more extensive than the regular routine maintenance that is done on the unit, suggesting it is not routine.

In addition, the work was performed with the assistance of outside contractors, instead of being done solely by plant personal. A third-party's central exchange component fleet was used to make the exchange. Also, this work was conducted by Northern Natural Gas (Northern) and original equipment manufacturer personnel jointly. The use of outside contractors to perform the work suggests that this is not a routine activity. See the attached Department Memo labeled Routine Maintenance, Repair, and Replacement.

Considering all of these factors, the turbine core replacement project required extensive changes indicating that it is not a routine activity.

Purpose

As stated in the request, the purpose of the overhaul was to return the gas turbine to the original thermodynamic and mechanical performance. Hence, this activity did not increase the capacity or efficiency of the unit, which may suggest it is a routine activity.

Frequency

As stated in the request, the turbine core change out was done in accordance with manufacturer's recommendations, one such maintenance/repair activity is to overhaul the gas producer and power turbine modules at approximately 30,000 operating hour intervals. Being done at regular intervals may suggest that it is routine activity, in isolation. However, this was the first turbine exchange since the original turbine was installed in 2006, which suggests it is not a routine activity.

Cost

After reviewing the costs of the project, the project costs are relatively high, suggesting it is not routine. This conclusion was drawn based on the following facts:

- The estimated cost of the exchange components (gas producer and power turbine) is \$1,938,624. According to the original equipment manufacturer, the replacement of the gas producer and power turbine with exchange components would typically cost 17-32% of comparable new equipment. In this case, the replacement cost will be approximately 35% of a new unit. A cost of this magnitude suggests that the replacement was not routine.
- The annual maintenance budget for this unit was estimated at \$75,000 (or \$225,000 over three years). The cost of the turbine replacement is \$1,938,624, which is approximately nine times the annual budget extended over three years. A cost of this size in comparison to regular annual maintenance suggests that the replacement was not routine.
- The project is capitalized. EPA and the courts have in the past consistently considered accounting characterization as one factor to be considered. The courts have strongly indicated that charging a project to the capital budget may be enough to disqualify it from the RMRR exclusion. In addition, the IDNR has also historically not viewed projects that are capitalized to not be routine. See the attached Department Memo labeled Routine Maintenance, Repair, and Replacement.
- Also, a cost of nearly two million is well within the range which EPA has determined to not be routine in previous decisions. See attached determination for Tennessee Department of Environment and Conservation, dated September 14, 2001 as one example.

Considering all of cost factors, the project is relatively expensive, which indicates that it is not a routine activity.

Other consideration

The project under review in this determination resulted in an increase in emissions. Performance testing done on the replaced unit showed an increase in NO_x emissions greater than 80%. An increase in emissions of this magnitude suggests that the replacement was not routine.

Conclusion

The turbine core changeout project required a significant undertaking to complete. In particular, the changes are relatively extensive and expensive compared to other routine maintenance activities performed on the unit. In addition, the project resulted in an increase in emissions for the unit. Therefore, weighing all of the factors, the Department does not consider this turbine change-out project routine maintenance, repair, and replacement.

Attachments to Evaluation:

Correspondence (emails or letters)

Other Supporting Documentation



Air Quality Bureau

Memo

To: Dave Phelps
From: Christopher A. Roling, PE
Date: 04/08/10
Re: Routine Maintenance, Repair, and Replacement (RMRR)

As the equipment at companies continues to age they will have to make a decision on whether to replace the old equipment with newer equipment or perform repairs to keep the equipment running. This means more and more applicants will be requesting a determination related to the Routine Maintenance, Repair, and Replacement (RMRR) provisions under the Prevention of Significant Deterioration (PSD) regulations. Therefore, the Department will continue to see the RMRR question and needs to have a plan in place to handle these determinations on a consistent basis.

Background:

The Clean Air Act (CAA) was enacted in 1970 *"to protect and enhance the quality of the nation's air resources so as to promote the public health and welfare and the productive capacity of its population."* 42 U.S.C. § 7401(b). The CAA defines a new source as

"any stationary source, the construction or modification of which is commenced after the publication of regulations (or, if earlier, proposed regulations) prescribing a standard of performance under this section which will be applicable to such source." 42 U.S.C. § 7411(a)(2)

A stationary source is *"any building, structure, facility, or installation which emits or may emit any air pollutant."* 42 U.S.C. § 7411(a)(3) with the term modification being defined as

"any physical change in, or change in the method of operation or, a stationary source which increases the amount of any air pollutant emitted by such source or which results in the emission of any air pollutant not previously emitted." 42 U.S.C. § 7411(a)(4)

Therefore, a plant constructed before the CAA is not required to obtain a permit until it undergoes a modification. The CAA was amended in 1977 to add two (2) programs. One of these programs was the Prevention of Significant Deterioration (PSD) program. The combination of the PSD program and the Non-Attainment New Source Review Requirements (NNSR) are collectively referred to as New Source Review (NSR) Program.

NSR applies to both new and modified sources of air pollution and requires major sources of air pollution to obtain permits prior to construction. Based on the above definitions it is clear Congress chose to "grandfather" existing

sources from NSR under the CAA. However, it is also clear that Congress did not intend that existing sources be forever grandfathered as compliance with the CAA is triggered when an existing source makes a modification which results in an increase in emissions unless there is a regulatory exemption that applies.

The definition of modification under the NSR Program in the CAA is the same as that used for the New Source Performance Standards (NSPS) which is:

“any physical change in, or change in the method of operation of, a stationary source which increases the amount of any air pollutant emitted by such source or which results in the emission of any air pollutant not previously emitted.” 42 U.S.C. § 7411(a)(4)

EPA defined major modification under the PSD regulations as:

“any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act.” 40 CFR §52.21(b)(2)(i)

There are several exceptions to the definition of “*physical change in or change in the method of operation*”. One of those exclusions is “*routine maintenance, repair and replacement (RMRR)*” [40 CFR §52.21(b)(2)(iii)(a)]. The Department has adopted these rules in 567 IAC Chapter 33. There is no regulatory definition of what is considered “*routine*” and this has been one of the main issues in several court cases.

Court Cases:

There have been several court decisions concerning RMRR over the last 5 – 6 years. However, all of these decisions relate back to one (1) utility case which is *Wisconsin Electric Power Co. v. Reilly* (7th Circuit 1990) which is referred to as WEPCO.

One of the main items from the WEPCO decision was the “*Multi-factor Test*” for determining RMRR. The Multi-factor test is a case-by-case analysis of each activity looking at:

- Nature & extent
- Frequency
- Purpose
- Cost

The court cases following WEPCO have provided additional guidance when conducting the case-by-case Multi-factor Test. The main cases that EPA cites are:

- *United States v. Southern Indiana Gas and Electric Company* (Southern District of Indiana, February 13, 2003)
- *United States v. Ohio Edison* (Southern District of Ohio, 2003)
- *United States, et al., v. Duke Energy Corporation* (Middle District of North Carolina, 2003)
- *United States, et al., v. Cinergy Corp.* (Southern District of Indiana, 2007)

All of these cases combined give a person insight on both the scope of the regulation and the types of issues a person needs to look at when making RMRR determinations.

Questions to Ask Company for RMRR Determinations:

Two (2) items are very clear from the court decisions:

- 1.) The courts have agreed that a case-by-case analysis for RMRR determinations is reasonable and
- 2.) The four factors to consider are the nature & extent of the project, the purpose of the project, the frequency of the project, and the cost of the project.

In order for the Department to obtain the best information possible in order to make its determination the following information, at a minimum, must be supplied by the company along with supporting documentation to backup their answers:

❖ Nature & Extent

- Provide a detailed description of the project. This description must list **all** changes to be made during the project. Also, please provide a percentage of the unit that is being repaired or replaced.
- Will the project be done by in-house maintenance staff or outside contractors?
- Have there been any planning studies prepared in preparation for the project? If so, please provide a copy of all studies.
- How long will the project take to complete? How long is your normal maintenance shutdown period?
- Are the replacement components of the same design as the components they are replacing?

❖ Purpose

- Please provide a brief description of why this project is being undertaken at this time.
- What was the expected lifetime of the unit when it was first installed?
- What is the unit's current age?
- Will the changes increase availability or reliability of the unit?
- Will the changes extend the lifetime of the unit?
- What was the original maximum rated capacity of the unit?
- What is the current capacity of the unit?
- Will the changes restore the unit to its original rated capacity?
- For combustion units:
 - What was the original efficiency of the unit?
 - What is the current efficiency of the unit?
 - Will the changes restore the unit to its original efficiency?

❖ Frequency

- Are the components being repaired/replaced the original components?
- How often are these changes made to the unit during its lifetime?
- How often are these changes made to similar units elsewhere?

❖ Cost

- What is your company's annual operation and maintenance (O&M) budget?
- What is the cost of this project?
- Where will the funding from this project come from (i.e. O&M budget or capital expenditure)?
- Does your company follow Generally Accepted Accounting Principles (GAAP)?
- Is this project being capitalized or expensed?

Guidance:

Based on the court cases there are some general concepts that need to be followed when making determinations on RMRR:

- The term "*modification*" was defined broadly in the CAA by Congress.
- The need for some repairs during the lifetime of a unit is a given in determining the life expectancy of a plant whether those repairs are annually or only a couple of times in its lifetime.
- Changes that are not frequent, come at a great cost, extend the lifetime of the unit, and require the unit to be out of service for an extended period of time (i.e. months) are not considered to be "*routine*".
- RMRR is to be interpreted narrowly on a case-by-case basis. The WEPCO court pointed out that the CAA should not be interpreted in a way that "*would open vistas of indefinite immunity from the provisions of NSPS and PSD.*" WEPCO, 893 F.2d at 909.
- A case-by-case analysis taking into account the nature & extent of the activity as well as its purpose, frequency, and cost has been considered a reasonable approach. The courts have taken into consideration several things under each of these factors for determining whether the change is "*routine*":
 - Nature & Extent:
 - Use of outside contractors: A company's maintenance group is responsible for day-to-day maintenance of plant equipment. The maintenance staff will also generally perform work during scheduled planned outages. In contrast, the work performed during extended outages is generally beyond the capacity of the in-house maintenance staff.
 - Several multi-volume planning studies: The use of multiple and extensive planning studies can be an indication of a project that is not "*routine*".
 - Amount of time to complete the project: A project that is "*routine*" is typically going to be done during a scheduled shutdown for maintenance which is typically a week to maybe a month depending on the type of unit. In contrast, a non-routine project will

generally have its own shutdown period and be for an extended amount of time such as several months.

- A majority of the unit was modified, replaced, redesigned or upgraded: If a large portion of the unit is being changed then that is an indication of the change not being “*routine*”.
 - Not like-kind replacements: If the components going in are not of the same design then that would be an indication the change is not “*routine*”. An example of this is in the case of the Ohio Edison case. One of the changes Ohio Edison made was to replace and redesign its entire vertical tube furnace with a spiral tube furnace which was the first of its kind in the United States. The Court said this redesign was clearly not “*routine*”.
- Purpose:
- Do the repairs reduce the number of forced outages or improve availability & reliability?: Changes to reduce forced outages or improve the availability or reliability of a unit are not considered “*routine*”. If the changes were done on a routine basis then a person would anticipate not having forced outages or reduced availability or reduced reliability. Basically, if a company has waited this long then its changes cannot be considered “*routine*”.
 - Do the changes extend the lifetime of the unit?: Every piece of equipment has an anticipated lifetime considering routine maintenance, replacement, and repair of components. If the changes being made will extend the lifetime of the unit beyond that point then the changes are no longer “*routine*”. An example is if the unit has a 30 year lifetime, but the changes will allow it to operate an additional 30 years for a total of 60 years.
 - Do the changes restore the unit to its original capacity or efficiency?: If changes are truly “*routine*” in nature it is anticipated that the capacity or efficiency would not degrade to the point that it would have to be restored. Therefore, changes to restore the capacity or efficiency are a strong indication that they are not of a “*routine*” nature.
- Frequency:
- Are the original components being replaced?: If the original components are being replaced for the first time in the lifetime of the unit then that can be an indication of a non-routine change especially if the unit is near the end of its expected lifetime.
 - How frequently are the changes made on the unit and within the industry?: This is probably the most confusing question overall. It is also the most scrutinized. EPA has stated that one should only consider activities that are routine for the unit and that if the change only occurs once or twice during the lifetime of the unit then it cannot be “*routine*”.

In a couple of the court cases the courts have agreed with EPA. For example, in the Ohio Edison case the court said:

“It is the frequency of an activity at a particular unit that is most instructive...”

And

“Types of activities undertaken within the industry as a whole have little bearing on the issue if an activity is performed at a unit only once or twice in the lifetime of that unit.”

However, in the Southern Indiana Gas & Electric case the court said the frequency of similar projects within an industry can inform the analysis so long as the exemption does not “swallow the modification rule”.

In the Duke Energy case the court evaluated what was routine within the industry and stated:

“Determination of RMRR cannot turn exclusively on whether a particular replacement project has ever occurred in the industry. If this were dispositive, it would render the PSD program a nullity.”

Fortunately, there is middle ground on this issue. It is apparent that one needs to look at frequency both on the individual unit and within the industry. As stated earlier every unit has an anticipated lifetime. So if a unit has a 30 year lifetime there are many repairs & maintenance activities that will occur during its lifetime. Some will be annually, others every 2 – 5 years, and others possibly only a couple of times during its lifetime.

The fact that a repair or replacement occurs only once or twice in the lifetime is not a reason to automatically call it non-routine. For example, if there are components that one would anticipate having to replace once in a unit's 30 year lifetime because that is normal for the industry then one would expect the replacement to occur around the 15 year period. However, if that replacement occurred in year 25 then it is a clear indication the change was not “*routine*”, but rather a way to extend the lifetime of the equipment. Similarly, if the change occurs in year 5 then it is also not likely to be a “*routine*” change.

Basically, the frequency of the change for both the unit and within the industry needs to be considered along with the age of the unit in order to make the determination on whether or not it is considered RMRR.

- Cost:
 - Capital expenditure vs. operation & maintenance (O&M): If the funding for the project comes from the normal O&M budget then it is a strong indication of the project being “*routine*” whereas if the project is non-routine it will likely be funded from a capital expenditure budget.

- Capitalized vs. expensed: If the company follows Generally Accepted Accounting Principles (GAAP) then costs incurred to achieve greater future benefits are capitalized whereas costs that simply maintain a given level of service are expensed. In order for a cost to be capitalized one (1) of three (3) conditions must be present

- 1.) The useful life of the asset must be increased,
- 2.) The quantity of units produced from the asset must be increased, or
- 3.) The quality of the units produced must be enhanced

An ordinary repair that simply maintains an asset does not satisfy these criteria and therefore, would be treated as an expense. A capital improvement involves a benefit lasting more than one (1) year.

- Even though frequency is the most scrutinized factor all four (4) factors must be taken into consideration when making a RMRR determination.

Conclusions:

There is no single answer for RMRR and all four (4) factors need to be weighed evenly since it is a case-by-case analysis, but between the “Questions” and “Guidance” above the engineering staff will have the tools to make a proper RMRR assessment.

Routine Maintenance, Repair, and Replacement Questions

Background:

EPA defined a major modification under the Prevention of Significant Deterioration (PSD) regulations is as:

“any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act.” 40 CFR §52.21(b)(2)(i)

There are several exceptions to the definition of “*physical change in or change in the method of operation*”. One of those exclusions is “*routine maintenance, repair and replacement (RMRR)*” [40 CFR §52.21(b)(2)(iii)(a)]. The Department has adopted these rules in 567 IAC Chapter 33. There is no regulatory definition of what is considered “*routine*”.

There have been several court decisions concerning RMRR over the last 5 – 6 years. However, all of these decisions relate back to one (1) utility case which is *Wisconsin Electric Power Co. v. Reilly* (7th Circuit 1990) which is referred to as WEPCO.

One of the main items from the WEPCO decision was the “*Multi-factor Test*” for determining RMRR. The Multi-factor test is a case-by-case analysis of each activity looking at:

- Nature & extent
- Frequency
- Purpose
- Cost

The court cases following WEPCO have provided additional guidance when conducting the case-by-case Multi-factor Test. The main cases that EPA cites are:

- *United States v. Southern Indiana Gas and Electric Company* (Southern District of Indiana, February 13, 2003)
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- *United States, et al., v. Duke Energy Corporation* (Middle District of North Carolina, 2003)
- *United States, et al., v. Cinergy Corp.* (Southern District of Indiana, 2007)

All of these cases combined give a person insight on both the scope of the regulation and the types of issues a person needs to look at when making RMRR determinations.

The Department is often asked for determinations on whether projects are classified as RMRR under the Prevention of Significant Deterioration (PSD) regulations. In order to reduce the amount of time needed to make these determinations the Department has developed a list of questions that, at a minimum, must be answered by the company along with any supporting documentation. The Department may still request additional information, but by providing answers to these questions an applicant will reduce the majority of back and forth the Department encounters during its review of RMRR determinations.

Questions:

- Nature & Extent
 - Provide a detailed description of the project. This description must list **all** changes to be made during the project. Also, please provide a percentage of the unit that is being repaired or replaced.
 - Will the project be done by in-house maintenance staff or outside contractors?
 - Have there been any planning studies prepared in preparation for the project? If so, please provide a copy of all studies.
 - How long will the project take to complete? How long is your normal maintenance shutdown period?
 - Are the replacement components of the same design as the components they are replacing?

- Purpose
 - Please provide a brief description of why this project is being undertaken at this time.
 - What was the expected lifetime of the unit when it was first installed?
 - What is the unit's current age?
 - Will the changes increase availability or reliability of the unit?
 - Will the changes extend the lifetime of the unit?
 - What was the original maximum rated capacity of the unit?
 - What is the current capacity of the unit?
 - Will the changes restore the unit to its original rated capacity?
 - For combustion units:
 - What was the original efficiency of the unit?
 - What is the current efficiency of the unit?
 - Will the changes restore the unit to its original efficiency?

- Frequency
 - Are the components being repaired/replaced the original components?
 - How often are these changes made to the unit during its lifetime?
 - How often are these changes made to similar units elsewhere?

- Cost
 - What is your company's annual operation and maintenance (O&M) budget?
 - What is the cost of this project?
 - Where will the funding from this project come from (i.e. O&M budget or capital expenditure)?
 - Does your company follow Generally Accepted Accounting Principles (GAAP)?
 - Is this project being capitalized or expensed?

Comparison of Project Aggregation Guidance

Factor	New EPA Guidance	Iowa Guidance
Timing	<p>Timing was a factor to consider in the past guidance. Now EPA says the following regarding timing:</p> <ol style="list-style-type: none"> (1) Not to be used as sole basis for aggregating projects. (2) Could be basis to not aggregate projects. (3) Rebuttal presumption against aggregating projects that occur three (3) or more years apart. Has to be a demonstration of a substantial relationship in order to rebut the presumption of nonaggregation. Rebuttal Example: a company intends to undertake a phased capital improvement project where specific timeframes are known. 	<ol style="list-style-type: none"> (1) Timing not used as sole basis, but as indicator that projects are related. (2) The timing triggers are: <ul style="list-style-type: none"> • Less than 1 year: multiple projects submitted within a year for a single source is a strong indicator that the projects should be considered as a single project. • 1 – 2 years: multiple projects submitted over a year apart, but within 2 years of each other need a closer review to determine whether they should be grouped as a single project. This is more a gray area and comes down to how strong of a technical dependence exists between the projects. • More than 2 years: multiple projects submitted more than 2 years apart are likely separate projects. There would have to be extenuating circumstances such as a company stating the projects are part of an overall phased construction process.
Technical Dependence	<p>EPA has always considered technical dependence. They provided the following indicators in the most recent guidance:</p> <ol style="list-style-type: none"> (1) One project cannot operate within its maximum design parameters for an extended period of time without the other project(s). (2) A source cannot achieve its maximum production without the implementation of both projects. (3) The intention for a project is to make a new product and absence of another project would not allow for the full production of the new product. (4) Projects occurring in unrelated parts of the source are generally not technically dependent. 	<ol style="list-style-type: none"> (1) No set criteria. (2) Case-by-case determination that applies reasonable engineering assumptions to the information provided by the company to determine how much of an interrelationship there is between multiple projects. Examples: (a) Are the projects on the same process line or different process lines? (b) Are the projects needed to get to a maximum production rate, but need to be done at different times due to other issues such as funding or scheduled downtime?
Economic Dependence	<p>EPA has always suggested economic dependence be considered. They provided the following indicators in the most recent guidance:</p> <ol style="list-style-type: none"> (1) Activities are dependent on each other for their economic viability if the economic revenues or “<i>Return on Investment (ROI)</i>” associated with the project could not be realized without the completion of the other project. (2) Generally evidenced when a particular project that may indeed be capable of operating technically independent from the other planned projects is nevertheless planned or integrated as part of a larger project goal and is interrelated to such an extent that it is not economically viable as a stand-alone project because both (or all) the projects are necessary for the larger project to achieve the operational level that justifies the investment of the planned project. 	<p>Iowa has not considered the economic factors for the following reasons:</p> <ol style="list-style-type: none"> (1) The type of data EPA suggests to be used is not readily available and is not data companies would necessarily want to share to be placed in the public record. (2) The construction permitting staff are not the experts on the economic viability of a project for a company. If a company proposes to do any project it is assumed they believe the project is economically viable. The construction permitting staff’s expertise is on technical issues and permitting.

Iowa Department of Natural Resources Training Outline for Air Dispersion Modelers

This outline is to be used by the lead worker in training new employees as dispersion modelers. The training outline was developed so that all dispersion modelers will have a uniform and thorough background. The self-paced training will depend on the individual's previous air quality experience and educational background, and may take up to six months to complete.

Familiarization with DNR/AQB

- Work with supervisor to complete Human Resources paperwork and items as assigned from the Iowa DNR Supervisor's New Employee Checklist.
- Review the [regulatory](#) and [environmental](#) Air Quality portions of the DNR web page.
- Review the [DNR intranet](#) (provide user name and password) including the DNR Employee Manual.
- Schedule training on Doc DNA, Records Section, and additional DNR training opportunities.
- Sign up for any applicable NACAA committees.
- Review organization of modeling information and guidance on the P drive.

Background (optional, depending on the individual)

Addresses the importance of air quality and why we perform dispersion modeling.

- Complete APTI SI-422 Air Pollution Control Orientation Course (hard copy)
- Read chapters 1-7 of "Fundamentals of Air Pollution" 3rd Edition (Boubel, Fox, Turner, and Stern) and answer selected questions at the end of each chapter:
 - Chapter 2: questions 5 and 7
 - Chapter 3: questions 1 – 5
 - Chapter 4: questions 2 and 6
 - Chapter 5: question 1
 - Chapter 7: questions 1 - 7
- Complete [APTI SI-431: Air Pollution Control Systems for Selected Industries](#) self-instructional course.

Meteorology Overview and Data

Covers wind, turbulence, vertical structure, plume types, mixing height, boundary layer, stability class, transport, and dispersion of pollutants.

- Complete [APTI SI-409: Basic Air Pollution Meteorology](#) (employees with a meteorology background can skip this)

- Complete the following sections of the online [Air Quality Meteorology](#) course:
 - Section 1, all parts*
 - Section 2, all parts*
 - Section 3, all parts
 - Section 4, all parts*
 - Section 5, parts 2,3,4, and 5
 - Section 6, all parts
 - Section 7, all parts
 - Section 8, parts 1,2, and 3

*Those with a background in meteorology may “test out”
- Review parameters in meteorological files with lead worker.
- Familiarization with DNR meteorological data sets and “representativeness” document on AQ website. AERMET familiarization (when applicable to the trainee).

Introduction to Dispersion Modeling

Covers significant impact levels, averaging periods, NAAQS, H2H concept, TTN and SCRAM websites.

- Review the information available on [EPA’s SCRAM website](#).
- Complete [APTI SI-410: Introduction to Dispersion Modeling](#) This is a somewhat outdated course. Review Lessons 1, 2, 4, 5, and 6.
- Complete Section 9, Parts 1, 2, 4 and 5 of the online [Air Quality Meteorology](#) course.
- Read appropriate sections from the most recent version of Fundamentals of Air Dispersion Modeling by Trinity Consultants

AERMOD

Includes editing an existing input file, creating an input file from scratch, reading output files, source types, and modeling front-end software.

- Review typical AERMOD input file via text editor with lead worker.
- Read the “User’s Guide for the AMS/EPA Regulatory Model - AERMOD”, Volume I – User Instructions (EPA-454/B-03-001) September 2004. Read chapters and addendum, skim appendices.
- Read [AERMOD: Description of Model Formulation AERMOD Implementation Guide](#)
- Familiarization with Trinity’s BREEZE software.
 - Overview with lead worker
 - Read help contents
- Read the “Users Guide for the AERMOD Terrain Preprocessor (AERMAP)”. Read chapters and addendum, skim appendices.
- Overview of the modeling array with lead worker

- Read modeling array user guide

Downwash/Good Engineering Practice

Covers concept of building downwash, GEP, dispersion techniques and merged stacks.

- Read “User’s Guide to the Building Profile Input Program” (EPA-454/R-93-038), Chapters 1 – 3.
- Read “Guideline for Determination of Good Engineering Practice Stack Height (Technical Support Document for the Stack Height Regulations)” Revised June 1985 (EPA-450/4-80-023R) Chapter 1.
- Complete downwash exercise and answer questions.

Construction Permit Project Procedures

- Walk through a basic construction permit modeling analysis with the lead worker.
- Review internal modeling checklist and memo template
- Discuss CP forms with one of the senior engineers.
- Read DNR “Air Dispersion Modeling Guidelines for Non-PSD Pre-Construction Permit Applications”.
- Read DNR “Air Dispersion Modeling Evaluation Checklist” and “Air Dispersion Modeling Checklist for Non-PSD Construction Permit Applications”.

Begin working on “simple” construction permitting projects with oversight. This includes archiving of projects on the P drive. In the absence of appropriate construction permitting projects, exercises can be assigned from practice projects found at: P:\Program_Development\Modeling\TRAINING.

Attend Trinity’s BREEZE training course

Review course materials prior to attending the training course.

Existing Modeling Guidance/Regulations/Resources

Includes an overview of Code of Federal Regulations (CFR), Iowa Code (IAC), State Implementation Plans (SIPs), New Source Review, and EPA Region 7.

- 40 CFR 51 Appendix W, take quiz provided by lead worker
- 40 CFR 50 (50.1-50.18)
- Obtain copy of Iowa Administrative Code (IAC) from records
- Read applicable portions of 567 IAC Chapters 20, 22.1-22.3, 22.100-22.101, 23.2-23.4, 28, and 33..Read DNR “Air Dispersion Modeling Guidelines for PSD Projects”.
- Read “Draft New Source Review Workshop Manual” Chapter C.

Modeling Inventory Procedures

The following modeling inventory procedures are pollutant specific and apply to all comprehensive SO₂ modeling (PSD and non-PSD) as well as comprehensive CO, NO₂, PM_{2.5} and PM₁₀ PSD modeling.

Identification of Facilities to Include

1. Determine the inventory search radius for each pollutant
 - A. 10km + SIA radius or 20km radius, whichever is greater
 - i. The SIA used here is the largest SIA for each pollutant. Example: For 1-hour NO₂ the SIA is 12 km and for annual NO₂ the SIA is 3 km. The 12 km distance would be used as the NO₂ SIA making the NO₂ inventory search radius 22 km.
2. If any of the inventory search radii will include an adjacent state, begin coordination with the state(s) to obtain a source inventory from them for the affected pollutants (see contact information below).
 - A. Be sure to only ask for **Title V facilities** within the inventory search radius determined in step 1
3. Add all adjacent facilities to the draft inventory regardless of potential emissions for all pollutants. Adjacent is defined as abutting properties or properties separated by a road, railway, right-of-way, stream, etc.
4. Develop a list of Title V facilities within each inventory search radius (determined in step 1)
 - A. Make a circle around facility in Google Earth (centered on tallest source)
 - B. Develop list of all counties the circle intersects
 - C. Open [TV database](#)
 - D. Click on Title V List (under Queries)
 - E. Filter by counties determined above
 - F. Enter each address into Google Earth to determine if facility is inside the circle
 - G. Add all facilities within the circle to the draft inventory
5. Screen out non-adjacent facilities based on potential emissions for each pollutant
 - SPARS OPTION
 - A. Open SPARS
 - B. Click reports under the reports tab in upper left hand corner
 - C. Under report categories highlight "Operating"
 - D. Under list of reports for the category selected highlight "Potential emissions..."
 - E. Enter Site ID (12 number SPARS ID)
 - F. Click Run Report
 - G. Look for latest emission data **(IT MAY NOT BE THE FIRST ONE LISTED!!!!)**
 - H. Remove facilities from the draft inventory whose facility-wide potential emissions are less than the applicable SER

TITLE V OPTION

- A. Go to [FINAL.TV file](#) on N drive
- B. The facility folders are listed by EIQ numbers, click on the correct folder
- C. Click on the latest renewal folder (if applicable) or initial folder
- D. Click on the Public Notice folder
- E. Find the pdf with an f at the end of the name or the pdf called fact sheet
- F. A summary of potential emissions is on the first page

Please note that SLEIS does not have potential emissions

6. For the facilities remaining in the draft inventory, screen out facilities based on the potential extent of their significant concentration gradients for each pollutant. See Figure 1 as an example.
 - A. Determine the location of each facility.
 - i. Use the coordinates of the tallest source as the facility location.
 - ii. If source information is not available use the center of the facility as the facility location.
 - B. Determine the height of the tallest source at all facilities for each pollutant. If source height information is not available for a particular facility, skip this step for that facility.
 - C. Calculate the distance between the facility of interest and the location of all other facilities using the locations determined in step A.
 - D. Determine the facility radius for each facility.
 - i. Facility radius (meters) = $330x^{0.5}$, where x = stack height (in feet) of the tallest source for the applicable pollutant (if the source height is not available assume the facility radius is equal to 10 km). For a further explanation on this equation, please see [appendix A](#).
 - ii. For the facility of interest, if the SIA is greater than the facility radius calculated above, use the SIA as the facility radius instead.
 - E. Add the facility radius for the facility of interest to each of the other facility radii.
 - F. For each facility in the draft inventory, determine if the facility radius intersects with the facility radius for the facility of interest.
 - i. If the distance between facilities (step C) is greater than the sum of the facility radii from step E then the radii **do not** intersect.
 - ii. If the distance between facilities (step C) is less than or equal to the number calculated in step E then the radii **do** intersect.
 - G. Remove each facility from the draft inventory whose facility radius does not intersect the facility radius of the facility of interest.

7. The complete inventory list includes all facilities from step 3 (adjacent), step 6 (non-adjacent) and step 2 (adjacent state), if applicable.
 - A. Sources from an adjacent state will need to be screened through steps 5 & 6

8. Subjectively check inventory list
 - A. Compare the facilities in the complete inventory to the original draft before any facilities were screened out.
 - B. Some facilities that were screened out may still warrant inclusion in the final inventory on a case-by-case basis. 8Bi and 8Bii are two examples but in no way an exhaustive list.
 - i. Nearby facilities whose potential emissions are just below the SER
 - ii. Distant facilities with very high potential emission levels, and/or a facility radius that almost intersects the facility radius of the facility of interest
 - C. Some facilities may warrant exclusion based on other screening criteria. Again 8Ci, 8Cii, and 8Ciii are examples and not a comprehensive list.
 - i. Adjacent facilities with very low potential emissions
 - ii. Facilities known to be shutting down or dramatically decreasing allowable emissions, but for which the data is not yet available.
 - iii. If the majority of emissions from a facility come from sources that will not be modeled.
 - D. Consult with Dispersion Modeling lead worker before finalizing an inventory that may include or exclude a facility(s) based on the subjectivity criteria in 8B and 8C.

9. The remaining list of facilities constitutes the final modeling inventory.

Obtaining individual source parameters and emission rates

After completing the steps listed above, go through individual permits and previous modeling files to obtain stack parameter and emissions information for each emission point at each facility that will be included in the cumulative analysis. Completion of this additional step will significantly reduce the time it will take to review the submitted analysis.

Previous modeling files are one of the easiest methods of obtaining this information, but it is important to ensure that the correct emission rates are used (some analyses may have been conducted using actuals). Otherwise it is generally necessary to review the permits for each source. For major facilities the Title V permit will conveniently list the construction permit for each emission point. As a last resort the report feature in Facility Explorer or SPARS can be used, but the quality of the data from these resources varies widely and should be verified if possible. Several resources that can be used are listed below. To find emission point characteristics in SPARS, search for the newest construction permit application and select the "Form MI-2" tab. Select the desired emission point from the list and click the "Emissions Point Specifications" button. Theoretically these values should match those provided by facility explorer. Facility Explorer will provide a more convenient listing and SPARS can be used to cross-check for accuracy if needed.

Emission point characteristics can also be found in SLEIS. Log into [SLEIS](#) and enter the facility name or number at the bottom of the welcome screen under Find Facility. Click on the release points button at the top of the page. A list of all emission points will appear. To download a CSV file with the entire list of emission points, click the export button in the lower left. For more information on a particular emission point click on the magnifying glass on the left hand side. Stack parameter and location information will appear.

When developing source-specific data for an inventory, non-point source emissions such as haul roads and storage piles only need to be included at adjacent facilities. As such, volume and area sources may be screened out of the list of sources at more distant facilities. Also, emergency equipment from distant sources may be excluded as well.

The emissions from sources that are outside of the SIA can be lumped into the tallest stack at the facility and modeled without downwash. This eliminates the need to find individual stack parameters and building dimensions for these more distant sources. Additionally, for sources in which no modeling has been previously performed and actual stack locations are difficult to determine, the location for each stack can be modeled at a coordinate representing the center of the facility. For large power plants with two or more similarly-sized large stacks, model them individually.

Information Resources

General

- [Facility Explorer](#) – Be sure to verify data obtained from here
- [Title V Database](#)
- Records (hard copy)
- SPARS – Electronically accessible version of many hard copy records
- Google Earth – Aerial photography and distance measurement tool
- [Bing Maps](#) – Good source of high-resolution aerial photography
- [DocDNA](#) – searchable hard copy records
- [Class I Area Q over D Calculator](#) – Use to determine distance to nearest Class I Area for information purposes in the modeling report.
- [SLEIS](#) – Iowa DNR State and Local Emissions Inventory System (only actual emissions data)

Construction Permits

- [Online construction permit search](#)
- [Current permits on the N drive](#)
- [Old permits on the N drive](#) – Good resource for determining old emission limits for increment

Operating Permits

- [Online operating permit search](#)
- [Title V permits and other information on the N drive](#) – Fact sheets useful for facility-wide potential emissions

Emissions Inventory

- [SPARS Data Download](#)
- The emissions inventory group has created Google Earth maps and spreadsheet summaries of facility-wide actual emissions for us to use in the past. If there is a specific group of information needed, it is possible that they may be a resource. Contact Jason Marcel for assistance with any request to the EI group.

Modeling Files

- [Previous construction permitting modeling files on the N drive](#)
- [Previous modeling files from Title V modeling analyses](#) – Contains some modeling for facilities that may have no construction permit modeling files, the data is older though

State Contact Information

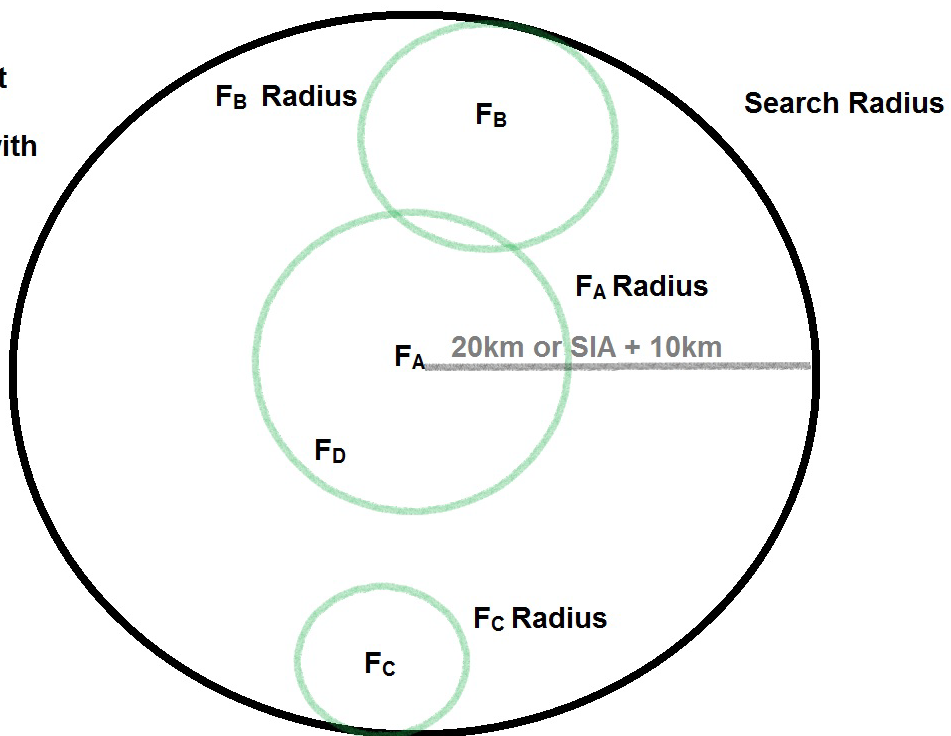
- Minnesota
[Jim Sullivan](#) : 651-757-2769
- Wisconsin
[John Roth](#): (608) 267-0805
- Illinois
[Jeff Sprague](#): (217) 524-4692
- Missouri
[Dawn Froning](#)
- Nebraska
[Lisa Alam](#): (402) 471-2925
- South Dakota
[Jim Anderson](#): (605) 773-3151

Figure 1. Example of Intersecting Radii

Key:

F_A = Facility of Interest

F_B, F_C, F_D = Facilities with Search Radius



In this example the green circles are the distances calculated from the equation and centered on the tallest source for the specific pollutant at each facility. F_D is within the facility of interest radius therefore will be included in the inventory. F_B and F_A have intersecting radii, F_B will be included in the inventory. F_C radius does not intersect F_A radius, F_C will not be included in the inventory.

Appendix A

In order to define and determine a significant concentration gradient a modeling analysis was completed with the following setup:

- Emission points were given the same emission rate (1 g/s), temperature (600°F), diameter (12 inches), and flow rate (2,500 acfm). These parameters were chosen to represent a source with a realistically large amount of plume rise and therefore a more extensive area of significant gradient.
- Stack heights were evaluated from 10-100 feet (incremented by 10 feet) through 150-600 feet (incremented by 50 feet). 600 feet was chosen as the cutoff because no source in Iowa is above 600 feet.
- The grid was set up as 0-3,000m at 50m spacing, 3,000-5,000m at 100m spacing, 5,000-20,000m at 500m spacing, and 20,000-50,000m at 1,000m spacing.
- All emission points were evaluated across all 19 meteorological stations currently used in Iowa for permitting.

For each stack height across all 19 meteorological stations, the maximum concentration at every distance was used to calculate the gradient. The gradient was calculated at each receptor by dividing the change in concentration per unit distance at that location by the maximum change in concentration per unit distance over the entire domain. The distance at which the concentration gradient equaled 1% was used as the cutoff for a significant concentration gradient. This value was used as a conservative assumption to ensure that all significant concentration is being captured.

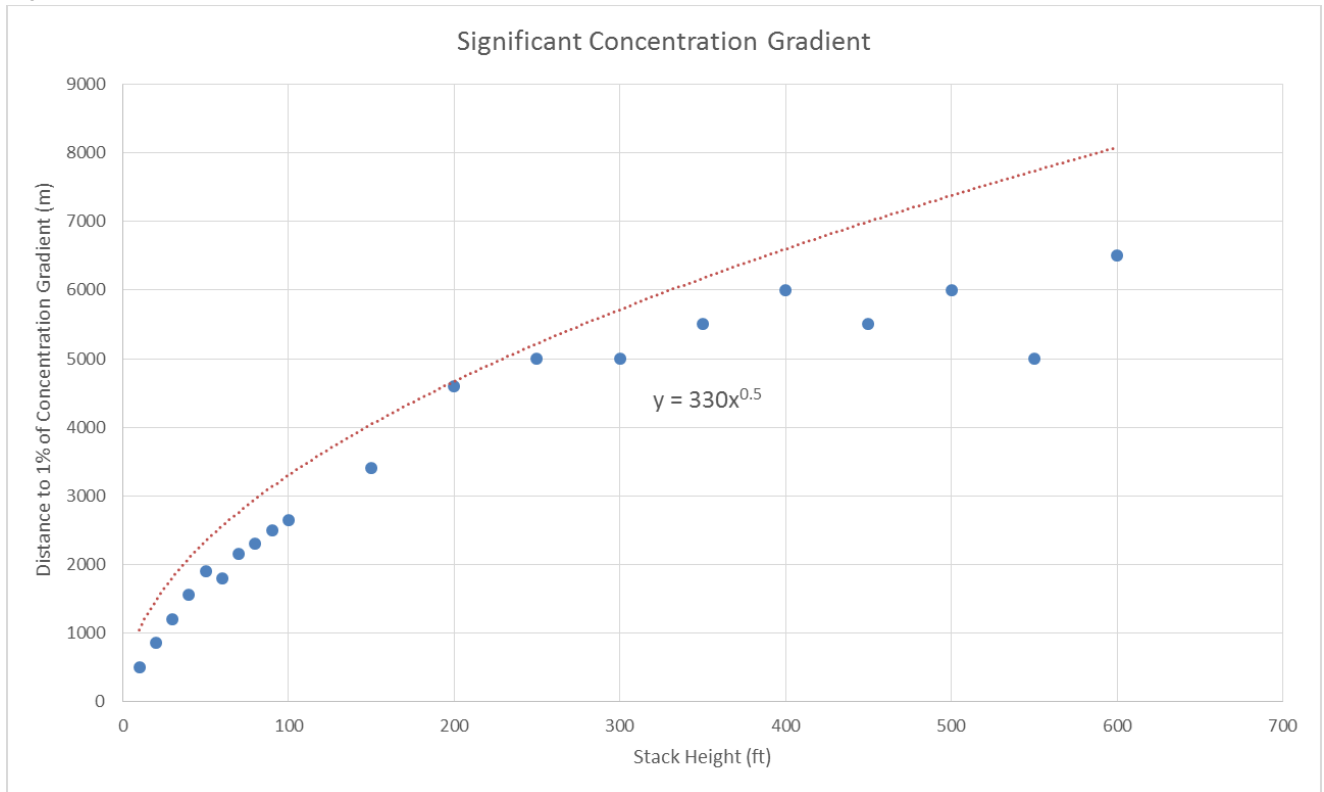
Table 1 reflects the distance to a 1% gradient based on the stack height.

Table 1. Stack Height vs. Distance Results

Stack Height (ft.)	Distance (m)
10	500
20	850
30	1,200
40	1,550
50	1,900
60	1,800
70	2,150
80	2,300
90	2,500
100	2,650
150	3,400
200	4,600
250	5,000
300	5,000
350	5,500
400	6,000
450	5,500
500	6,000
550	5,000
600	6,500

Table 1 was plotted in Figure 2 below. The red curve fit line was used to conservatively capture the distance where each stack height equaled 1% of the concentration gradient. The red curve fit line is the equation listed in step 6D.

Figure 2. Distance to 1% of Concentration Gradient



2020 Program Review

Air Quality Division
Polk County Public Works

FINAL REPORT

Program Review Performed by:

Iowa Department of Natural Resources
Air Quality Bureau

October 2020

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Attachment A: Comments on Specific Polk County Construction Permits

Attachment B: Polk County Employee Training

Attachment C: Summary of Polk Precision and Bias

Attachment D: Polk County Comments and DNR Responses

Attachment E: Polk County-Identified CMS 80% SM Facilities

Executive Summary

The Iowa Department of Natural Resources (DNR) performed a program review of the Polk County Public Works Department, Air Quality Division (POLK) between October 5-8, 2020. Due to Covid-19 restrictions, the program review was completed using digital files and email communications, and all meetings were held virtually. The review was for the period of July 1, 2019, through June 30, 2020. The final SFY 2020 Contract (Contract) was used as a guide to evaluate the program. This Executive Summary summarizes the findings of the DNR.

Program Management – POLK maintained the required full time equivalents (FTEs) and continues to meet the requirements regarding knowledge, skills, and abilities required for POLK personnel who perform visible emissions observations, dispersion modeling, facility inspections, ambient monitoring, and permit reviews. POLK maintained familiarity with changing procedures and new air quality developments by participation in various training, webinars, workshops, and conferences. POLK staff took advantage of opportunities to attend conferences and training virtually that otherwise may not have been possible in person.

POLK provided timely and complete information (reports, invoices, etc.) by the Contract due dates. DNR appreciates POLK's rapid follow-up and resolution when requested. POLK is commended for working with their accounting staff to streamline the invoice review process. POLK is encouraged to use the report feature in EASY Air to check billable hours against the hours being submitted in the billable hours documentation to DNR.

POLK worked with their county IT staff to implement a new Polk County Public Works website with an updated look and organization. The updated website allows users to quickly find information on ambient air monitoring, open burning, and construction permitting.

POLK assisted in developing a SIP submittal addendum to DNR's January 2019 request to include POLK's 2018 rule updates in the SIP. The addendum requested that previously finalized POLK rule updates (prior to 2018) be included in the SIP and also clarified the 2018 rule changes submitted for SIP inclusion. POLK worked with DNR to develop a revised rule review and submittal process to prevent similar issues from occurring in the future.

POLK is commended for their collaboration with DNR and EPA and rapid action to address ethylene oxide (EtO) emissions from a source in the county.

POLK assisted as requested by DNR with testing and implementation of the EASY Air system. For a possible POLK module to EASY Air, POLK completed a scoping questionnaire and reviewed a draft project proposal provided by enfoTech. A second proposal was under review by POLK when the contract period ended.

Construction Permitting and Dispersion Modeling

Construction Permitting – POLK overall produces well written permits and evaluations and provides specific guidance to facilities on NESHAP compliance obligations. DNR identified just a handful of instances of permit procedures used by POLK during this review period that either differed from the latest version of the DNR Construction Permit Manual or current standing EPA guidance as discussed later in the report.

Dispersion Modeling – POLK staff trained in dispersion modeling exhibit an understanding of current EPA and DNR modeling guidelines, have the ability to perform and review dispersion modeling analyses, are able to use the modeling output to determine compliance with the applicable ambient air quality standards, and understand the strategies and control measures used. POLK requests assistance from the DNR in reviewing modeling analyses, as appropriate, and is encouraged to continue to contact DNR staff for assistance related to dispersion modeling.

The majority of the projects that were reviewed did not require a modeling analysis. Those that were modeled contained no modeling errors that would have negatively impacted the resulting permits. The permit review notes consistently

included comments regarding modeling applicability and why it was, or was not, required and there were logical exclusions from modeling when the modeling determination form may have otherwise indicated modeling was required.

The DNR recommends POLK verify model inputs and settings in the BEEST software to avoid errors. When relaxing operating limits for sources classified as intermittent consider the full hourly emission rate when determining if modeling should be required. Make sure the correct information is included in the permit record and follow up on modeling that needs to be reevaluated as a result of reviewing the analyses.

Title V – The quality of work performed by the POLK technical staff has been very good and there continues to be consistency between POLK and DNR Title V operating permits. The performance criteria for POLK was to draft for issuance or denial a minimum of four initial or renewal title V operating permits during SFY 2020. Three permits were drafted during this review period, but only one was issued due to timing or compliance issues. During the audit, POLK and DNR staff discussed ways to improve and increase communication regarding the time schedule for issuing permits to meet the performance criteria. The DNR appreciates participation of POLK in development and testing of the new EASY Air electronic permitting system and participation in the regularly scheduled Title V section meetings.

Compliance and Inspection – The DNR AQB Compliance Unit staff chose to review file documentation for SFYs 2019-2020 for six POLK files. DNR staff also reviewed Integrated Compliance Information System (ICIS) data entry with POLK, going over facility information as it relates to the Compliance Monitoring Strategy (CMS), criteria pollutant entry, applicable air programs, enforcement actions, case files, Semi Annual Monitoring Reports and Title V Annual Certifications. Data verification of data for ICIS was also discussed with Polk.

The file review showed POLK runs an effective compliance program. POLK is doing a very good job evaluating, tracking, and documenting the compliance status with major, synthetic minor and minor facilities. POLK met all timelines established in the Contract for submitting compliance reports and the CMS to the DNR.

The Microsoft Corporation file reviewed contained several stack tests for PM10 and NOx. All Stack tests summaries and response letters were reviewed by DNR. DNR chose a failed test report to spot check calculations and follow-up to a violation. POLK ensured the correct test methods were followed, documented relevant process and test information. POLK identified a violation, worked through a compliance plan with the facility, and ensured the source was returned to compliance. DNR conducted two joint stack test observations with POLK during 2019. Due to COVID-19 concerns and lack of opportunity, no joint observations had been completed in 2020 at the time of this report.

During the 2018 audit, DNR recommended that stack test acceptance letters to the company include results calculated by POLK. POLK has modified their letters to include their calculated test results in all acceptance letters and the Notice of Violation (NOV) reviewed.

POLK uses a modified form of the Title V permit to conduct the Full Compliance Evaluation (FCE) at major sources. The major source FCE reports were well documented, though no deviations were identified. DNR reviewed two minor source inspection reports. The minor inspection reports were not clear if the facility's classification was SM80 or minor. It was recommended that some mechanism be added to the minor source inspection reports to identify the facility classification so there is no confusion. Facility classification is important since the classification is used when determining violation types and reporting requirements.

EPA requires information be logged in the ICIS database and POLK is required to enter the minimum data requirements (MDRs) for all inspections, stack tests, annual Title V certifications, NOVs, and other CMS-related activities in a timely manner. Based on the file review, POLK is meeting the EPA's MDR's by entering the results from the FCEs within 60 days of the inspection. POLK is also meeting the requirements to review and enter the Title V Annual Compliance certifications.

Corrective Action Required

NOVs, stack tests, and Air Programs are compliance activities that POLK is required to report in ICIS. During the ICIS data review, DNR noted that Air Programs were missing for two of the facilities and for one facility an NOV, Case File and some stack tests had not been entered. These items need to be reviewed for completeness to ensure required information for the facility are entered and accurate. The DNR is requiring that POLK take corrective action to address these data management issues. It was agreed that DNR would provide POLK with an ICIS manual used for data entry. Mark Fields of DNR held follow-up training on NOV/Case File entry with Bridget McNerney of POLK on October 15, 2020.

Deficiencies Identified

CMS Category (Major or SM80) and facility criteria pollutants are compliance activities that POLK is required to report in the ICIS database. These two categories were identified for corrective action in the 2018 report. The DNR found that one of the six facilities reviewed had the incorrect CMS source categories listed, thus creating incorrect inspection schedule dates within ICIS. Additionally, four of the six facilities reviewed had air pollutants missing or incorrectly categorized in the required criteria pollutant list.

Plan Required

POLK will provide DNR with a written plan specifically addressing how the CMS Category and facility criteria pollutants data will be corrected for the Major and SM80 facilities in the ICIS database. This plan will include dates by which the identified deficiencies will be addressed. The written plan shall be submitted to DNR by February 1, 2021 (or by an agreed upon alternative date).

The Compliance and Inspection section of this report includes detailed explanations of the DNR's review, findings, suggestions, required corrective actions, deficiencies identified, and the required plan.

Ambient Air Monitoring –DNR commends POLK for doing an excellent job running their air monitoring network. For data collected in 2018 and 2019, all POLK criteria pollutant monitors evaluated by EPA were recommended for certification. The final results of audits done on POLK's gas and particulate samplers by EPA Region 7 were well within acceptance limits. Precision and bias stats for data collected in the most recent complete calendar year were reviewed, and the results were very good. POLK has also been responsive to suggestions made in previous audits conducted by DNR and SHL.

DNR and POLK discussed deployment of the new "49 iQ" generation of Thermo ozone analyzers, and how some display erratic behavior when the ambient dew point is close to the trailer temperature. DNR emphasized the need to develop an ozone SOP that adequately covers the differences between the older "i" model and the new "iQ" version. DNR stressed the importance of frequently tracking agreement between collocated monitors and taking corrective action before a significant amount of questionable data is collected. DNR continues to recommend that POLK add language to their BAM SOP describing how an investigation will be required if excessive bias between collocated PM2.5 monitors is observed.

DNR and POLK also discussed options for, and alternatives to, developing a log that summarizes substantive changes to POLK QA documents. DNR encouraged POLK to document the steps they already take to verify data processing and polling software, as well as expand their testing of software as needed to conform to "Data Trail Audit" procedures outlined in the Redbook. DNR asked POLK to continue following EPA's request to upload all precision checks to AQS including those that failed, as well as those where the calibration system itself was deemed to be defective.

I. Introduction

POLK has been delegated the responsibility of implementing the State of Iowa air pollution control implementation plan within POLK. To assure that the implementation plan is carried out, the DNR negotiated a 28E Contract (Contract) with the Polk County Board of Supervisors for the period of July 1, 2019, through June 30, 2020. The purpose of the Contract was to control and prevent air pollution within POLK. Particular emphasis was placed on the collection and assessment of information regarding air quality, the permitting of sources of air emissions, the enforcement of emission limits, and the attainment and maintenance of ambient air quality standards.

The purpose of the program review is to help in the development and improvement of the air pollution program in POLK by providing guidance, identifying areas where more support is needed from DNR, and to foster a good working relationship. As a means to verify that POLK fulfilled the terms of the Contract, DNR staff performed a program review between October 5 and October 8, 2020. The review was divided into the following five categories: program management, construction permitting, Title V permitting, compliance and inspection, and ambient air monitoring. DNR staff performed a comprehensive review of each category. The findings of this review are discussed by category throughout this report.

The program review team consisted of the following DNR staff members (by section):

- Brian Hutchins, Compliance and Ambient Air Monitoring Section Supervisor
- Mark Fields, Compliance Unit
- Reid Bermel, Compliance Unit
- John Gering, Ambient Air Monitoring Unit
- Jasmine Bootman, Ambient Air Monitoring Unit
- Sarah Piziali, Construction Permitting Section Supervisor
- Karen Kuhn, Construction Permitting Section
- Marnie Stein, Operating Permits/Title V Section Supervisor
- Jeremy Arndt, Operating Permits/Title V Section
- Jim McGraw, Program Development & Support Section Supervisor
- Brad Ashton, Program Development & Support Section
- Christine Paulson, Program Development & Support Section

II. Program Management Provisions

A. Personnel

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: Section 5.A.1.1 of the Contract requires POLK to employ sufficient personnel to perform the services of the Contract during the period of agreement. POLK staff met the requirements specified in Section 5.A.1.1 regarding knowledge, skills, and abilities required for POLK personnel who perform visible emissions observations, dispersion modeling, facility inspections, ambient monitoring, and permit reviews.

POLK committed to operate the program with a staff level of approximately 9.0 FTE. The quarterly activity reports submitted to DNR for SFY 2020 included summaries of staff time utilization and show that POLK met this staffing level commitment.

POLK is required to have at least two staff certified in visible emissions observations and one staff trained in conducting air dispersion modeling. POLK has six staff certified in visible emissions observations and one staff trained in conducting air dispersion modeling. POLK staff are cross-trained among several air quality disciplines.

During SFY 2020, POLK staff maintained familiarity with applicable air quality permitting, inspection, and monitoring procedures, techniques, and technologies, and changing procedures and new air quality developments by attending pertinent EPA, NACAA, and DNR meetings, webinars, training classes, workshops, and conferences. The table in Attachment B provides a summary of the training courses attended by POLK staff (as provided in POLK's end-of-year report).

The training completed was consistent with the POLK SFY 2020 training plan and relevant to the job duties of each staff member working under the Contract. POLK staff took advantage of opportunities to attend conferences and training virtually that otherwise may not have been possible in person.

B. Fiscal Reporting

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: Quarterly expense reports, itemized based on line items provided in the Contract, were submitted with request for payment per Section 7.5. This included supporting documentation in accordance with Section 7.5/2 for reimbursement of expenses associated with billable hours. All invoices were submitted on time and three of the four invoices contained no errors. POLK rapidly addressed and resubmitted the one invoice that contain an error.

POLK is commended for working with their accounting staff to streamline the invoice review process and have DNR review draft invoices and supporting billable hours documentation before sending the invoice to the Board of Supervisors Chair for signature.

The billable hours documentation for quarter 3 included 4.25 hours of operating permit application review time between two facilities that was not included in EASY Air. POLK is encouraged to use the report feature in EASY Air to check billable hours against the hours being submitted in the billable hours documentation to DNR to ensure that all of the billable hours are included for the generation of invoices to send to the applicable facilities.

POLK expended all pass through funds in SFY20. POLK exceeded their Local Program Match by \$46,296.

C. Initial Contract Review

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: POLK met all budget information request timelines and their responses to additional information requests were always provided timely.

D. Final Contract Review

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: POLK addressed questions quickly and provided timely responses to DNR. POLK moved the Contract through the signatory process in an efficient manner and provided documentation that the Contract went through the proper channels for approval.

E. Information Technology

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: POLK maintains a user friendly, up-to-date web site and reviews the Website at least quarterly and makes updates as needed. A webpage for POLK fee advisory group meetings is up-to-date with information for a public participation period scheduled to occur in December 2020.

County IT staff implemented a new Polk County Public Works website with an updated look and organization that provides a quick and easy way for users to find information on ambient air monitoring, open burning, and construction permitting. Open burning fact sheets for each user category help the public better understand the burning rules that apply to them. The open burning webpage also conveniently includes links to the open burning ordinances for all municipalities in the county.

F. Legal Authority

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: POLK confers with DNR on the need, content and timing of revisions and updates to Chapter V of the POLK rules as required in the Contract. POLK collects ideas for rulemakings through the year and combines these ideas with applicable federal and state regulation changes.

POLK completed their last Chapter V update in November 2018. DNR submitted the rule updates to EPA for inclusion in the State Implementation Plan (SIP) in January 2019. Subsequent review of the rule updates by POLK, DNR, and EPA staff determined that misinterpretations of POLK’s rulemaking process had occurred in the past, resulting in previous POLK rule changes being unintentionally omitted from the SIP. POLK worked with DNR and EPA staff to develop a SIP submittal addendum to request that previously finalized POLK rule updates (prior to 2018) be included in the SIP and also clarified the 2018 rule changes submitted for SIP inclusion. The resulting 12 page SIP addendum was submitted to EPA in July 2020.

POLK worked with DNR to develop a revised rule review and submittal process to prevent similar issues from occurring in the future. Under the revised process, POLK will provide DNR the tracked version of the proposed rules provided for public comment, as well as a tracked version of the final Board approved and published rules. DNR will provide the tracked version of the final rules in its SIP revision request to EPA.

POLK plans to initiate their next rules update in the first half of SFY 2022, and anticipates the Polk County Board of Supervisors approval early in the second half of SFY 2022. This will allow time for the SIP submittal currently under review by EPA to be finalized and published. It will also allow POLK to have new staff involved in the rule change process.

G. Minority and Women Business Enterprise (MBE/WBE)

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: Reports were completed and provided timely.

H. Intergovernmental Cooperation

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: POLK participated in an annual local program meeting held in September 2019. The meeting included discussions on budget and personnel planning for the next fiscal year, updates on EASY Air implementation, and updates and discussions on permitting and monitoring topics.

POLK is commended for their collaboration with DNR and EPA and rapid action to address ethylene oxide (EtO) emissions from a source in the county. POLK also shared their permit templates with the State of Wisconsin to assist them in addressing a similar situation.

POLK assisted as requested by DNR with testing and implementation of the EASY Air system. POLK uses EASY Air to track time spent on processing Title V applications using procedures as provided by DNR.

For a POLK EASY Air module, POLK completed and submitted a scoping questionnaire document to enfoTech. POLK reviewed a draft project proposal provided by enfoTech in June 2020, and requested a revised project proposal that would include only the online construction permit component of the POLK program. POLK was reviewing the revised proposal when the contract period ended.

III. Construction Permitting and Dispersion Modeling Provisions

A. Construction Permit Activities (Source Review, Permit Issuance, Draft Permit Review, Permit Transfer)

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: See Attachment A for comments on application review.

B. Permit/Modeling Procedures

Acceptable Corrective Action Needed Deficient Not evaluated

Permit Comments: POLK is excellent at reviewing and noting all applicable NESHAP in their issued permits. Additionally, the peer review process is continuing to catch errors prior to permit issuance and the engineering evaluations are well written and explanatory. DNR finds that POLK could improve consistency in a few areas:

1. When setting plant-wide synthetic minor limits, even for minor sources, POLK needs to ensure that all HAPs are counted towards the limit, not just the surface coating HAPs. Alternatively, non-surface coating HAPs could be separated from the surface coating HAP limit, if the facility-wide surface coating HAP limit is reduced proportionately.
2. If a company is currently not subject to a NESHAP because it is not using a target HAP, the DNR suggests that POLK note the company is not subject to the NESHAP unless it is using the target HAP or else set an operating limit forbidding the use of the HAP.
3. DNR would recommend the use of emission factors in estimating the actual emissions of a unit rather than calculations based on an assumed control equipment grain loading, as control equipment can be overloaded.
4. DNR would recommend always including the expected stack characteristics in a permit, instead of requiring the company to modify the permit once the unit is built.

See Attachment A for other comments.

Modeling Comments: POLK staff trained in dispersion modeling exhibit an understanding of current EPA and DNR modeling guidelines, have the ability to perform and review dispersion modeling analyses, are able to use the modeling output to determine compliance with the applicable ambient air quality standards, and understand the strategies and control measures used to mitigate modeled exceedances of these standards.

POLK requests assistance from DNR in reviewing modeling analyses, as appropriate, and is encouraged to continue to contact DNR staff for assistance related to dispersion modeling. DNR will continue to assist POLK by conducting a quality assurance (QA) review of each modeling project conducted or reviewed by POLK. DNR will provide an updated QA checklist to use for this purpose.

The majority of the projects that were reviewed did not require a modeling analysis. Those that were modeled contained no modeling errors that would have negatively impacted the resulting permits.

There are several good items to note:

1. POLK continues to review the impact from air toxics.
2. Modeling determinations are well documented, especially as it relates to project emissions levels.
3. POLK correctly waives modeling analyses in cases where emission reductions offset new sources.

4. Previous applications are considered when determining if projects should be aggregated for modeling determinations.
5. POLK uses MERPs to address secondary formation.

Some areas for improvement include:

1. Verify use of correct version of the model (check settings in BEEST each time the model is run).
2. Verify that the current version of the meteorological data are used and that the correct base elevation is applied (there can be different versions of the same five-year set of meteorology; the newest version should be downloaded from the DNR website at the time of analysis).
3. Make sure to use the correct scale when inputting model objects (LCS Holdings).
4. Verify correct modeling information is provided in the record (the Siculus checklist in the record was for the previous project).
5. Follow up on revisions to modeling (Siculus) due to discrepancies noted during review of submitted analyses. Make sure final modeling files are included in the record.
6. Relaxation of the operating limits for intermittent sources needs to be considered when determining if modeling will be necessary for 1-hour NO₂ (DMMW).

See Attachment A for other comments.

C. Reporting Requirements

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: No comments.

D. DNR Responsibilities

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: No comments.

IV. Title V Permitting Provisions

A. Title V Permit Activities

Acceptable Corrective Action Needed Deficient Not evaluated

Comments:

The performance criteria for POLK was to draft for issuance or denial a minimum of four initial or renewal Title V Operating Permits during SFY 2020. During this review period, three permits were drafted: ADM – Des Moines Soybean, John Deere Des Moines Works, and Quality Manufacturing Corporation. POLK billed 474.50 hours of work on these three permits during SFY 2020, but due to compliance and other timing issues, only the permit for Quality Manufacturing Corporation was issued during SFY 2020.

POLK billed 111.25 hours for Quality Manufacturing during SFY 2020, and the permit was issued in May 6, 2020.

POLK billed 245.00 hours for John Deere Des Moines Works during SFY 2020, but issuance of the permit was delayed until August 2020. The first public notice period was from June 4, 2020 – July 4, 2020, but the facility submitted a revised Compliance Assurance Monitoring (CAM) Plan during the initial public comment period. Because the changes to the CAM plan were a relaxation of visible emissions observations, the permit was required to be public noticed a second time from July 16, 2020 – August 15, 2020. The permit was then issued on August 16, 2020.

POLK billed 118.25 hours during SFY 2020 and 112.0 hours during SFY 2019 for ADM – Des Moines Soybean, but POLK was not able to issue the permit because the facility did not demonstrate compliance with several emission limits during stack

testing and may need to modify a large number of PSD construction permits. It is possible that ADM may need to submit an entirely new Title V renewal application for this facility, so it did not make sense to issue the Title V permit with an extensive compliance plan.

A proposed schedule identifying the Title V permits POLK intended to issue was submitted timely (quarterly) to DNR, and the POLK permit staff, POLK Supervisor, DNR Lead Worker, and DNR Supervisor communicated about possible delays via email during the review period. However, some of this communication was lost in the turnover of employees at DNR. During the audit, POLK and DNR staff discussed ways to improve and increase communication between quarterly reports. If the issuance of a permit will be delayed, POLK staff will notify DNR as soon as possible and not wait until the quarterly report to notify DNR. In turn, DNR will check-in with POLK staff more often regarding the time schedule for issuing permits and any possible delays.

B. Application Review

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: Completeness reviews were conducted by POLK in a timely manner to ensure that the applications were not deemed complete by default.

C. Permit Drafting Procedures

Comments: POLK completes the technical reviews and prepares draft permits according to 567 IAC 22.108 and generally follows the DNR Title V Review Manual, Title V Permit Review Check Sheet and Completeness Review Checklist. There continues to be appropriate coordination and consistency between the two programs.

D. Public Notice Intent to Issue

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: POLK is following the new electronic notification process, and at a minimum, posts a notice on a publically available website and in Iowa EASY Air.

E. Final Permit Issuance

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: No comments. DNR reviews draft POLK permits prior to the public notice period.

F. Permit Renewals

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: POLK drafts renewal permits using the same procedures that apply to initial issuance.

G. Reopening Issued Title V Permits

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: No permits were re-opened during this period.

H. Permit Changes

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: No comments. DNR reviews draft POLK permits prior to the public notice period.

I. Reporting Requirements

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: POLK submitted quarterly status reports with the required information on active Title V permit applications. As noted above under "A. Title V Permit Activities", POLK and DNR staff will work to improve and increase communication between quarterly reports.

V. Compliance and Inspection Provisions

File Review Procedures

DNR AQB Compliance Unit staff chose to review six POLK files. The six files reviewed were a sufficient number to sample the POLK enforcement and compliance program. DNR chose to review file documentation for SFYs 2019-2020. DNR reviewed the following files:

Major Sources:

MidAmerican Energy Sycamore - 77-09-002

Principal Life Insurance - 77-01-174

Titan Tire Company - 77-01-003

E.P.S. Products Inc. - 77-01-175

Minor Sources

Ancor/Bemis - 77-01-001

Microsoft Corporation - 02086

Prior to the onsite audit, DNR staff requested and reviewed the files sent electronically to the DNR. Additional files were requested after the initial review. POLK provided the additional files requested very timely. On October 5 and 9, 2020, DNR staff conferred with POLK staff regarding the inspection reports, ACC and SAMR reports, specific enforcement actions at one facility, stack testing, ICIS database, and data verification.

A. Compliance

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: Overall, the files were easily located, well organized and contained the inspection reports, Title V Annual Certification, and Semi-Annual Reports, as well as other correspondences. The file review showed POLK runs an effective compliance program. POLK is doing a very good job evaluating, tracking, and documenting the compliance status with major, synthetic minor and minor facilities.

One NOV for a stack test violation was included for Microsoft Corporation. POLK provided timely responses and ensured facility follow up pertaining to the noncompliance situation, further detail is provided in the stack test section of the report. POLK also met all timelines established in the Contract for submitting compliance reports, as well as for submitting the annual CMS to the DNR for review and approval. DNR received copies of other compliance correspondences, as required in the Contract.

B. Stack Tests

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: The Microsoft file contained several stack tests from 2019 for PM/PM10, NOx and CO.

POLK reviews the reports and generates a summary sheet using their own calculations. POLK's results agreed with results provided by the stack test company. DNR staff noted that acceptance letters included results calculated by POLK as recommended during the 2018 review. The stack test review included one NOV for emission limit violations. POLK required a compliance plan, sent a compliance plan acceptance letter and a test acceptance letter for the retest of the source that demonstrated compliance. The entire procedure from the identification of the violation through the return to compliance by retesting was well documented.

DNR also conducted two joint stack test observations with POLK during 2019. A joint observation between POLK and DNR was conducted on February 20, 2019 at ADM Des Moines and March 19, 2019 at AE Dairy. POLK arrived timely, ensured the correct test methods were followed, documented relevant process and test information, was available for testing questions and made method alternative decisions while onsite. No joint observations had been conducted in 2020 as of the drafting of this report due to COVID 19 restricting most observation activities. A joint observation is currently being scheduled for November 2020.

C. Inspections

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: POLK uses a modified form of the Title V permit to conduct the Full Compliance Evaluation (FCE) at major facilities. This provides the inspector with all the information and requirements for each emission point. The inspection form contains the inspector's on site observations, notes, and source's compliance status. The major source FCE reports were well documented and clear on how any deviations were addressed. Only one deviation was noted in an inspection report for follow up but the response due date was outside the review period of this audit.

DNR reviewed two minor source inspection reports in which information was found pertaining to each source at the facility and if/how compliance was being maintained. No deviations or violations were identified for follow up. DNR suggested that POLK add a mechanism to clearly identify if a source is an SM80 or true minor.

As required by the Contracts, DNR conducted two joint inspections with POLK in SFY 2019 and in SFY 2020.

D. Variances

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: No variances were included in the files reviewed.

E. Data Management

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: EPA requires information be logged in ICIS tracking database and POLK is required to enter the MDRs for all inspections, stack tests, NOVs, Annual Title V Compliance Certifications, and other CMS-related activities in a timely manner.

Based on the file review, POLK is meeting the MDR requirements entering the FCE within 60 days of the inspection and entering the Annual Title V Compliance Certification received and review dates.

NOVs, stack tests, Case Files, and Air Programs are compliance monitoring activities POLK is required to report in ICIS. Two of the six Facilities reviewed had incorrect or missing Air Programs. One of the six facilities reviewed did not have data entered for an NOV, a Case File, and three stack tests. This is an area where POLK needs improvement and DNR recommends corrective action.

CMS Category (Major or SM80) and facility criteria pollutants are compliance monitoring activities POLK is required to report in ICIS. These categories were marked for corrective action in the 2018 Audit report. These categories were again found to be incomplete or incorrect. As a result, POLK was found deficient in entering data for the required CMS and Air Pollutants categories.

One of six facilities reviewed had the incorrect CMS source categories listed, thus creating incorrect inspection schedule dates within ICIS. During the 2018 audit, POLK indicated that the FCE inspection lists are being derived from the

EnerGov database and not ICIS, so all inspections were done on time. DNR recommends that POLK compare the EnerGov list generated to the ICIS CMS schedule to determine if the CMS source category is correct. Four of the six facilities reviewed, Principal Life Insurance, Iowa EPS, MidAmerican Energy Sycamore, and Microsoft Corporation had pollutants missing or incorrectly identified in the required criteria pollutant list. These items need to be reviewed for completeness to ensure all pollutants for the facility are entered. DNR is requiring that POLK take corrective action to address these data management issues.

DNR has agreed to supply a screen shot ICIS manual that DNR follows to provide information in ICIS. Also, POLK requested training on the entry of NOV's and Case Files which was conducted on October 15, 2020. Data verification was discussed with POLK to ensure the efforts they are putting forth to update ICIS are being counted on the federal level. Data verification is voluntary but a way to ensure data is being documented in the correct locations.

Plan Required

POLK will provide DNR with a written plan, specifically addressing how the CMS Category and facility criteria pollutants data will be corrected for the Major and SM80 facilities in the ICIS database. This plan will include dates by which the identified deficiencies will be addressed. The written plan shall be submitted to DNR by February 1, 2021 (or by an agreed upon alternative date).

F. Emissions Data

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: POLK requires and observes stack testing at facilities within Polk County. POLK also requires the use of federal test methods for compliance demonstrations. POLK enters their stack test observations in ICIS which is then provided to DNR in the compliance report updates. POLK reviews the stack test reports and generates a summary sheet prior to entering data into the ICIS database. The Microsoft file contained several stack test reports for review. The file review showed POLK is conducting thorough reviews of stack test reports, performing their own calculation of results, and sending acceptance letters with results calculated by Polk.

VI. Ambient Air Monitoring Provisions

The program review interview was conducted with the POLK field and QA staff (Brent Blanchard, Jennifer Bradley, Chad Hines, Jessica Moeller, and Jim Voigt). The review team (Brian Hutchins and John Gering) would like to thank POLK staff for their helpfulness and candor during the program review.

Commendation

DNR appreciates all the good work that POLK staff have done running their monitoring network over the last two years. For data collected in 2018 and 2019, all POLK criteria pollutant monitors evaluated by EPA were recommended for certification. This certification is based on having both good data quality and completeness. Precision and bias stats for data collected in the most recent complete calendar year were reviewed, and POLK typically met the associated goals.

Eight days prior to DNR's last audit of POLK in October 2018, EPA Region 7 audited all gas and PM samplers at the Health Dept. site, so official results were not available at that time. Both ozone analyzers were also audited by EPA at Sheldahl in July 2019. The results from those audits of gas and particulate samplers were well within acceptance limits.

POLK is the only reporting organization in the state running the Beta Attenuation Method (BAM) 1022 samplers for PM 2.5. (SHL and Linn County operate the model 1020 version of the BAM samplers.)

Aside from a site at Lake Sugema, POLK runs the only other NO2 monitor in the state.

POLK has been responsive to suggestions made in previous audits conducted by DNR, and SHL. Some examples include:

- Ongoing participation in EPA's Protocol Gas Verification Program;
- Adding language to their ozone SOP, requiring action in the event of excessive collocated differences;
- Documenting the distance between collocated particulate samplers in their network plans;
- Revising SOPs to assign equal weight to all three levels (zero, precision, and span) in the validation of data based on daily auto-check results; and
- Editing organizational charts to ensure they are consistent with one another.

Brent Blanchard is retiring after years of service as an ambient monitoring Quality Assurance officer. DNR would like to express our appreciation and gratitude for his work, and wish him well retirement.

A. Finding/Recommendation #1:

Finding: In the spring of 2017, POLK began running their BAM 1022 PM 2.5 samplers with Very Sharp Cut Cyclone inlets. Use of that type of inlet made them a Federally Equivalent Method. In 2018, the POC 4 BAM was replaced twice. It was replaced again in June 2020. Since its start date with the Very Sharp Cut inlet, the POC 3 BAM has shown good agreement and correlations with the FRM method.

At the audit two years ago, DNR recommended adding validation criteria to the BAM SOP, based on a more than usual level of disagreement between one BAM and the other, as well as the FRM; and on the duration of such disagreement. Specifically, DNR recommended a threshold based on a monthly average disagreement between the two samplers of more than 2.0 ug/m³.

The SHL BAM 1020 SOP also has a section discussing ongoing substantive disagreement between any two PM 2.5 analyzers at a site, and how that will trigger an investigation. The SHL SOP does not mention a specific numerical threshold, but references a review of 24-hour averages performed every month.

Recommendation: DNR continues to recommend that POLK add language to their BAM SOP describing how excessive bias between the BAM analyzers, or the BAM analyzers and the FRM, will be defined; and that an investigation will be required if excessive bias is observed.

B. Finding/Recommendation #2:

Finding: 40 CFR Part 53 defines Class III Acceptance Criteria for continuous PM_{2.5} monitors. When the 24-hour averages from the continuous monitor are plotted against the corresponding values from an FRM monitor, the slope and intercept from the resulting regression line have to meet certain conditions in order for the continuous monitor to be truly NAAQS comparable. In 2018, both POCs met these criteria, while in 2019 only the POC 3 analyzer met the standard.

Recommendation: During SLAMs certification in the early part of 2021, DNR will review data collected in 2020 to determine if POLK's continuous PM_{2.5} monitors meet Class III Acceptance Criteria. If data is invalidated from continuous PM_{2.5} samplers in FEM configuration; the proposal to do so will need to be included in Iowa's Network Plan, which is put out for public review, and ultimately subject to approval or disapproval by EPA. POLK should work with DNR and EPA to assign or remove exclusion flags for NAAQS comparability in EPA's AQS database if necessary.

C. Finding/Recommendation #3:

Finding: Prior to the last DNR audit, POLK replaced their mechanical Wind Speed and Wind Direction sensors with ultrasonic sensors. Ultrasonic wind sensors are a newer technology compared to the traditional sensors that use a vane to measure wind direction and rotating cups to measure speed. EPA rules for checks and audits were relatively straight forward and well worked out for traditional WS/WD sensors. However, the QC/QA criteria for ultrasonic sensors is still onerous and in a process of development.

POLK noted that that Met One Instruments no longer makes the model 50.5 ultrasonic WS/WD sensors they are currently using. The current POLK budget allocates 10K for purchasing "meteorological sensors". POLK indicated that

this refers to purchasing a suitable replacement for the ultrasonic WS/WD sensors (rather than temperature or humidity probes). POLK is uncertain at this point who the vendor will be. The current POLK budget also allocates 8K for vendor training. POLK has not yet identified a focus for this training. (POLK indicated that at this point, in person training will probably not be an option because of the Corona virus pandemic.)

Recommendation: DNR suggested that POLK consider training on the ultrasonic met sensors, from the vendor they will be getting them from. POLK should collaborate with DNR to identify an appropriate training topic for the current fiscal year.

D. Finding/Recommendation #4:

Finding: In 2017, EPA expanded the options for the types of QC/QA data that the AQS national database stores for gas analyzers. When a check is performed, both the calibration system and the analyzer might be functioning properly, but there are two other possible scenarios.

- Scenario #1: the calibration system is working, and the analyzer is not.
- Scenario #2: the calibration system is malfunctioning, and therefore the analyzer only appears to “fail” Redbook acceptance criteria.

Prior to 2017, Iowa Reporting Organizations didn’t record either of these two cases in the precision check portion of AQS. EPA issued a memo with coding guidance in August 2017, and DNR asked its reporting organizations to implement the memo starting at the beginning of 2018.

The memo indicated that for the first scenario, the AMP 504 should show both the known and measured check concentrations without a null code, while data is withheld from the AMP 501 using a null code. For scenario #2 the AMP 504 should show neither check concentration, and a “1C” null code; while the AMP 501 will show valid raw data. POLK implemented the memo starting at the beginning of 2018.

Recommendation: DNR requests that POLK continue to follow the memo for data collected in 2020. Although excessive use of the “1C” flag is not a problem in Polk County, DNR indicated that the “1C” flag is not appropriate in cases where the check was not even initiated. (This would be especially true for a multi-day interval, where it’s established after the first day that the equipment is not functional.) For single day instances, if a check was started and it failed midway through the check, the 1C flag may be appropriate on a case by case basis.

E. Finding/Recommendation #5:

Finding: In their February 2019 TSA audit of POLK, SHL suggested that POLK “Implement software testing documentation”.

An air quality network typically involves a number of data processing steps. The analyzer itself puts out short term averages, while an on-site data logger rolls up the short-term averages into a one-hour average, and stores the hourly average. Then a polling computer located in a central office gathers in all the hourly averages from the on-site data loggers. Finally, the values that are stored on the polling computer get uploaded into EPA’s national AQS data base. One element of software testing is to verify this process and trace some short-term averages from the time they are generated by the analyzer, all the way out to the final step of what actually got uploaded into AQS.

POLK monthly reports indicate that the QA officer already performs a “data trail audit” regarding the flow checks, and collocated concentrations, from PM samplers; and manual bi-weekly checks on gas analyzers. Data from a source prior to the AQS upload, is compared to the results in the AMP 251. POLK reported they already installed the necessary TEI software on a laptop that enables them to read values directly from Thermo gas analyzers, and successfully compared them to hourly averages for NO2 in EPA’s national database.

Recommendation: DNR recommends that POLK more fully document the steps they are already taking. During the audit, DNR shared section 14.1.3 of the January 2017 QA Handbook Vol II (Redbook) which contained a description of

how to perform a Data Trail Audit. DNR also suggested that POLK review the “data trail audit” procedures described in the Redbook, and expand their own data processing audits to conform to those guidelines as needed.

F. Finding/Recommendation #6:

Finding: An issue that was mentioned in both of the last two SHL TSA audits of POLK was to resume and standardize the document change log procedure, especially for SOPs. In January 2020, POLK created two files for documenting changes to their Ozone and NO2 SOPs. These were files that were separate from the SOP’s themselves and were stored on a Polk County shared drive. A few weeks ago POLK forwarded copies of these to files to DNR. Some changes were made to SOPs (e.g. the BAM 1022 SOP) that were not recorded in a log. POLK indicated that this suggestion had been met with some resistance in their organization, and thought that another option might be submitting SOPs with track changes enabled.

Recommendation: DNR requests that POLK adopt either of the following two options, in response to SHL’s suggestion to initiate a document change log:

- One option would be to add a concise summary of substantive changes somewhere in the SOP, QAPP, or QMP itself (e.g. either immediately after the Table of Contents or at the end). This approach may save POLK staff time in tracking revisions. (DNR provided POLK with an example of a log of changes from a Linn County BAM SOP during the audit.)
- Alternatively, in future submissions of QA documents to DNR, POLK would submit two versions of each document. One version would be in MS Word format showing tracked changes since the last version sent to DNR. A second copy would be “clean” and with all changes accepted.

G. Finding/Recommendation #7:

Finding: Each year (typically in December), POLK performs an on-site SOP operator review where POLK’s own QA officer compares procedures actually used in the field to the written procedures in the SOPs. In this internal audit, the POLK QA officer indicated that POLK needs to continue working on developing the 49iQ SOP.

The POLK network currently utilizes two generations of Thermo ozone analyzers (the older “i” series, and the newest “iQ” series). In mid-June 2020, all of POLK’s field analyzers were iQ series, while the older “i” series were used as ozone calibrators. Since June, POLK had to withdraw its iQ field analyzers from the Health Dept. and the only iQ units currently in the POLK network are two collocated field analyzers at Sheldahl.

In the summer of 2020, DNR (in conjunction with SHL & Thermo) observed erratic behavior in the 1-minute concentration averages when the trailer temperature was close to the ambient dew point. This problem was characteristic of some 49iQ analyzers, but was generally not a problem for older “i” series. Due to the unreliability of the new “iQ” series ozone analyzers, SHL always uses an older “i” series as the primary monitor, and deploys the less reliable “iQ” monitors only as a secondary monitor.

In April 2020, POLK submitted an SOP related to Ozone with a file name of “Ozone 49iQ SOP 2020”. It references both 49i as well as 49iQ instruments (although references to the former appear to be limited to the transfer standards). Forms 5 and 10 are Field Sheets that have separate fields for the flow through cell A and cell B [see box labeled “Diagnostic Check (Site Analyzer)”]. While this is appropriate for the 49i transfer standards, the 49iQ field analyzers no longer have separate flow sensors for each cell. The acceptable flow rate on Forms 5 and 10 is given as 0.4-1.6 LPM. Although this applies to the 49i instruments, the 49iQ flow rate would be higher (1.0-2.5 LPM) since it is the sum of the flow through both cells. (The same issue probably arises with respect to Form 7, although it’s less clear if it’s in reference to the monitor that collects the raw data, the transfer standard, or both.) Section 3.10.1.2 refers to a yearly verification of the pressure sensors, but does not provide any acceptable limits.

Other states also saw problems with the “iQ” series during times when the ambient dew point was near the trailer temperature. It’s anticipated that EPA will release a memo approving the use of Nafion dryers (to dry the ambient air going into ozone analyzers). The memo is expected to indicate that the addition of such a drier will not void the Federal Equivalency status of the monitors.

Recommendation: DNR encouraged POLK to continue the development and finalization of SOPs and Field Data Sheets that adequately account for the differences between the two generations of Thermo model 49 ozone analyzers. DNR suggests that POLK continue to communicate with DNR, Thermo, and EPA and monitor developments for resolving the 49iQ problems. DNR also requests that Polk deploy a 49i as the primary at Sheldahl until the 49iQ issues are resolved. The design value at Sheldahl might be lost if both 49iQ's experience oscillations in the 1-minute data.

H. Finding/Recommendation #8:

Finding: There were a few other changes recommended by the POLK QA officer as a result of matching procedures used in the field to the written procedures in the SOPs.

- Two changes were requested and made to the BAM 1022 SOP.
- The QA officer referenced a section of POLK's SOP for wind speed sensors, and noted that the units for the wind speed span test should be MPH rather than meters per second. In the SOP that DNR received in April 2020, the units are still m/s.
- The QA officer also noted that an update should be made in the SOP for discrete PM2.5 and PM10 samplers. This was in reference to adding information and instructions about "new automated data collection procedures for data validation". The specific section of the SOP the QA officer referred to (Section 4.14 on Validation and Reporting of Data) was not updated in the SOP that DNR received in April 2020.

Recommendation: POLK should verify what the appropriate units are for the wind speed span test and update the SOP as necessary. POLK should also add information and instructions about new automated data collection procedures for data validation to their SOP for discrete PM2.5 and PM10 samplers.

I. Finding/Recommendation #9:

Finding: DNR and POLK reviewed the 2019 precision and bias statistics (See Attachment C). The results were good. In isolated cases where goals were not met, the results were comparable to other states, as well as other reporting organizations within Iowa.

Recommendation: No additional comments.

Attachment A

Comments on Specific Polk County Construction Permits

The purpose of the construction permit evaluation was to determine if the program is being conducted in a manner consistent with the Contract. The investigation looked specifically at the following permit actions, which were intended to be representative.

Airgas USA

Permit 3431

Ankeny Glass

Permit 3396

Billion FT Des Moines

Permits 3413 and 3414

Construction Products

Permits 3507 and 3508

D&J Plating

Permit 3393

Des Moines Metro Wastewater

Permit 2888 through 2890

Permit 2891 modified

Permit 3405

Flint Hills Resources

Permit 3484

Permit 3504

Helena Industries

Permit 3490 through 3499

Katecho Inc.

Permit 2590

Permit 3033 modified

Permit 3218 modified

Permit 3429

LCS Holdings

Permit 3399

Norwalk Ready Mix

Permits 3476 through 3480

Pioneer Hybrid

Permit 2612 modified

Permit 2743 modified #2

Permit 2808 modified #2

Permit 3398

Permit 3445

Permits 3453 through 3455
Permit 3512

Quick Steel Fabricators
Permits 3425 through 3427

Siculus
Permits 3064 thru 3249

Titan Tire
Permit 0855 modified #26
Permit 2015 modified #7
Permit 3424
Permit 3442
Permit 3488
Permit 3500
Permit 3502
Permit 3503

The following general issues were noted:

- 1) Plant-wide synthetic minor limits need to account for all emissions from the facility, either through recordkeeping or specific limits. For sources that use recordkeeping and have VOC or HAP-emitting sources (such as boilers or welding) along with surface coating, a facility may find it helpful if the recordkeeping excludes non-surface coating emissions, with the surface-coating limit adjusted as necessary to keep them a synthetic minor.
- 2) Emission calculations should not be based on an expected outlet concentration from a control device. Instead, emission factors such as AP-42 should be used, with the expected control device efficiency used to determine if the emission unit can meet the emission limit set in the permit.
- 3) If a company is currently not subject to a NESHAP because it is not using a target HAP, the DNR suggests either adding an operating condition forbidding the use of the target HAP, or else noting that the company is not subject to the NESHAP unless it is using the target HAP.

The following are permit specific issues:

Facility Name:

Flint Hills Resources – Permit 3484. The header of the emission limit table “The following emission limits shall not be exceeded: For Temporary Emission Units: FT-1 – FT-12 GB-1 and PT-1” could be read as meaning the limit is for each unit rather than as a combined limit.

Helena Industries – General comments. DNR understands that Helena Industries intends to switch operating conditions from each permit with a specific HAP limit to a plantwide HAP limit. In these cases, DNR recommends modifying all affected permits in one project. This ensures that the operating limits do not conflict with each other and are consistent across the plant. DNR also notes that a facility might find it useful to eliminate sources with minimal HAP emissions, such as natural gas boilers, from facility wide calculations. For example, if combustion sources at a facility have a PTE of 0.1 tpy HAP, set the facility wide limit at 9.3 and 24.3 tpy HAP and specify that limit as for non-combustion sources only. If POLK has any questions about how to handle complex projects such as this, Gary Smith of the DNR would be happy to help. POLK can also bring up any questions at DNR’s regular staff meetings.

Katecho – Permit 3218 modified. In cases such as this, where the material usage limit (713,640 lbs/yr of acrylic acid) does not have a clear connection with the VOC limit (5.41 tpy), DNR would suggest including additional information. For example, a footnote to the VOC limit stating that it is based on the material usage limit in the operating conditions and using the assumptions in (citation).

Katecho – Permit 3429. For coating lines, even if a plant is not intending to use a material which contains HAPs, it's helpful to set a requirement that no HAPs shall be used anyway for area sources, because otherwise VOC limits are also HAP limits.

Pioneer Hybrid – Permit 3455. If PM10 and PM2.5 limits need to be lower than PM limits due to NAAQS or modeling concerns over the project, DNR recommends adding a footnote listing either the project number or the rest of the emission units, to ensure that if a limit for one permit is later raised, the NAAQS will be re-evaluated.

Quick Steel Fabricators – Permit 3426. In the evaluation, the allowable limit for the unit should not be used as an emission factor.

Quick Steel Fabricators – Permits 3425 and 3427. Permit 3425 has a single HAP/total HAP limit of 0.07 tpy. Permit 3427 has a material usage limit of 2,000 gal/yr with a single HAP limit of 9.4 lbs/gal and a total HAP limit of 24.4 lbs/gal. DNR would recommend rewriting the material usage limit to 9.33 lb single HAP/gal and 24.33 lb total HAP/gal, in order to keep the facility a synthetic minor.

Titan Tire – Permits 3487 and 3488. Both of these permits have “To Be Determined” in Condition 9, with an operating limit that the company must modify the permit with the correct stack characteristics by a due date. Even for VOC-only sources, DNR would recommend using the most likely characteristics for the original permit.

Modeling Comments

DMMW:

Permits 2890mod and 2891mod: The annual tpy was well below 40, and the lb/hr rate was not changing, but this project relaxed the operating limit to 1000 hr/yr. The original permitting for these sources relied on the assumption that these were intermittent sources (1-hour NOx was not evaluated). The new operating limit excluded these sources from being classified as intermittent. The full hourly emission rates from these sources should have been compared to the short term SER (9.13 lb/hr). This project should have been modeled for NO₂. It is possible that this error has since been somewhat offset by emissions reductions in permits 2888 Modified and 2889 Modified.

LCS Holdings:

Permit #3399: The scale used to input the data appears to be off. The aerial photo in the record has the correct UTM measurements listed for the corners of the image, which would have been imported into BEEST, but the actual model inputs are about half the size they should be and are shifted about 200 feet NW from their actual location. The meteorological data is not the correct version. Version B was used instead of E (the current version at the time of the modeling analysis). In addition, the wrong base elevation was used. These discrepancies were also noted by the consultant during the permitting process as they corresponded about the analysis.

DNR reran the model with the current version of AERMOD and correcting the various issues noted above and the result was slightly lower (2.01 µg/m³). The discrepancies were conservative. Smaller buildings created more compact wakes which decreased initial dispersion at the property line, and the property line was closer to the source. The limit that was included in the permit is supported by this revised analysis.

Attachment B

Polk County Employee Training SFY 2020

Course/Meeting	Location	Date(s)	Attendee(s)
NACAA Monitoring Committee	Conference Call	4/16/20	Jim Voigt
NACAA 2020 Virtual Spring Meeting	Online	5/18/20-5/19/20	Jim Voigt
NACAA discussion on EPA's PM NAAQS Proposal	Conference Call	6/1/20	Jim Voigt
NACAA Monitoring Committee	Conference Call	6/18/20	Jim Voigt
Visible Emissions Evaluation	Des Moines	10/22/2019	Brent Blanchard
NACAA Permitting & Compliance Workshop	St. Louis, MO	2/25 – 2/26/2020	Brent Blanchard
NACAA Spring Membership Meeting	Teleconference	5/18 – 5/19/2020	Brent Blanchard
NACAA Enforcement Committee Call	Conference Call	7/3/2019	Jeremy Becker
EPA Webinar Air Toxics	Webinar	7/24/2019	Jeremy Becker
NACAA Enforcement Committee Call	Conference Call	9/4/2019	Jeremy Becker
IDPH Environmental Health Update	Conference Call	9/16/2019	Jeremy Becker
EPA Webinar on Proposed Oil & Gas NSPS	Webinar	9/26/2019	Jeremy Becker
Budget Review-Polk County	Presentation	10/10/2019	Jeremy Becker
48 th Annual Governor's Safety & Health Conference	Conference Altoona	10/29-11/1/2019	Jeremy Becker
NACAA Enforcement Committee Call	Conference Call	11/6/2019	Jeremy Becker
Title V – EasyAir Training	Go To Meeting	12/12/2019	Jeremy Becker
Major/Minor Fee Advisory Meetings– Local Program Presentations	Meeting	12/19/2019	Jeremy Becker
ECHO – EPA Webinar	Webinar	2/18/2020	Jeremy Becker
EPA/Iowa DNR/Polk/Linn Discussion – ETO Sterilization	Meeting	2/20/2020	Jeremy Becker
EGov Online Review	Meeting	2/27/2020	Jeremy Becker
Air Quality Website Design Review & Discussion	Meeting	3/9/2020	Jeremy Becker
COVID-19	Meeting	3/17/2020	Jeremy Becker
Umbraco Training	Zoom Meeting	3/30/2020	Jeremy Becker
EPA & Covid 19 Briefing	Conference Call	4/6/2020	Jeremy Becker
Riskpro Accident Reporting Process Review	Zoom Meeting	4/30/2020	Jeremy Becker
Air Quality and Healthy Hearts: Progress and Remaining Challenges	Webinar	5/28/20	Jeremy Becker
COVID-19 Planning & Telework Progress Review	Zoom Meeting	6/4/2020	Jeremy Becker
NACAA Membership Call	Conference Call	8/12/19	Jennifer Bradley
Easy Air Training	IDNR	9/24/19	Jennifer Bradley
NACAA Air Toxics Committee	Conference Call	10/3/19	Jennifer Bradley
Smoke School	West Des Moines	10/23/19	Jennifer Bradley
Winter Driving	Polk County	11/8/19	Jennifer Bradley
NACAA Air Sensors Monitoring	Conference Call	12/4/19	Jennifer Bradley
NACAA Permitting & NSR Committee	Conference Call	1/15/20	Jennifer Bradley
IDNR Fee Advisory Meeting-Minor Source	IDNR	1/28/20	Jennifer Bradley
APTI Learning Management System	Webinar	4/15/20	Jennifer Bradley
NACAA Monitoring Committee	Conference Call	4/16/20	Jennifer Bradley
NACAA 2020 Spring Meeting	Webinar	5/18-5/19/2020	Jennifer Bradley
EPA Expands Research on SARS-CoV-2 in the Environment	Webinar	5/27/20	Jennifer Bradley
Air Quality and Healthy Hearts: Progress and Remaining Challenges	Webinar	5/28/20	Jennifer Bradley
NACAA discussion on EPA's PM NAAQS Proposal	Conference Call	6/1/20	Jennifer Bradley

Course/Meeting	Location	Date(s)	Attendee(s)
Sensor Data on AirNow's Fire and Smoke Map	Webinar	6/9/20	Jennifer Bradley
Environmental Protection Commission	Conference Call	6/16/20	Jennifer Bradley
NACAA Monitoring Committee	Conference Call	6/18/20	Jennifer Bradley
NACAA Criteria Pollutants Committee	Conference Call	6/24/20	Jennifer Bradley
DNR Title V Meeting	Des Moines, IA	7/24/2019	Jeff Gabby
DNR Title V Meeting	Des Moines, IA	8/22/2019	Jeff Gabby
First Air/CPR/AED Training	Des Moines, IA	9/17/2019	Jeff Gabby
EASY Air Title V Training	Des Moines, IA	9/25/2019	Jeff Gabby
DIETING SPOOFS IN AMERICA presentation by Andrew Mettillie, HR Analyst/Wellness Coordinator	Des Moines, IA	10/17/2019	Jeff Gabby
Winter Driving Training	Des Moines, IA	11/8/2019	Jeff Gabby
DNR Title V Meeting	Des Moines, IA	11/14/2019	Jeff Gabby
DNR Title V Meeting/EASY Air Training	Des Moines, IA	12/12/2019	Jeff Gabby
DNR Title V Meeting	Des Moines, IA	1/9/2020	Jeff Gabby
NACAA PERMITTING AND NEW SOURCE REVIEW COMMITTEE Conference Call	Des Moines, IA	1/15/2020	Jeff Gabby
Lunch & Learn: Stress and Laughter, Drew Mettillie	Des Moines, IA	1/16/2020	Jeff Gabby
Major Source Construction Permitting & Title V Fee Advisory Group Meeting	Des Moines, IA	1/28/2020	Jeff Gabby
DNR Title V Meeting	Des Moines, IA	2/6/2020	Jeff Gabby
EPA ECHO Training: Enforcement and Compliance History Online	Des Moines, IA	2/18/2020	Jeff Gabby
DNR Title V Meeting	Des Moines, IA	3/5/2020	Jeff Gabby
DNR Title V Meeting	Des Moines, IA	4/2/2020	Jeff Gabby
DNR Title V Meeting	Des Moines, IA	4/30/2020	Jeff Gabby
DNR Title V Meeting	Des Moines, IA	5/28/2020	Jeff Gabby
DNR Title V Meeting	Des Moines, IA	6/25/2020	Jeff Gabby
49 IQ Training	Coralville	8/27/19	Jessica Moeller
American Heart Association CPR/AED Training	Des Moines	9/18/19	Jessica Moeller
Visible Emission Training	Des Moines	10/22/19	Jessica Moeller
Agilaire	Des Moines	10/29-10/30/19	Jessica Moeller
Defensive Driving	Des Moines	11/8/19	Jessica Moeller
NDPTC - PER 343 Social Media Engagement Strategies	Des Moines	2/4/20	Jessica Moeller
NDPTC - PER 344 Social Media Tools and Techniques	Des Moines	2/5/20	Jessica Moeller
APTI SI – 460	Online	5/16/20	Jessica Moeller
NACAA 2020 Virtual Spring Meeting	Online	5/18/20-5/19/20	Jessica Moeller
EPA-Air Quality & Healthy Hearts: Progress and Remaining Challenges	Online	5/28/20	Jessica Moeller
EPA – PM NAAQS	Online	6/1/20	Jessica Moeller
CenSARA -NACT 335 Environmental Compliance	IDNR	8/6 – 8/8	Bridget Mc Nerney
First Aid/CPR	Polk County	9/18/19	Bridget Mc Nerney
Smoke School	Method 9	10/22/19	Bridget Mc Nerney
ECHO Webinar – Search tools	Computer		Bridget Mc Nerney
ECHO Webinar-enforcement and compliance history online	Computer	11/12/19	Bridget Mc Nerney
NAACA Annual Conference	Remote computer/phone	5/18/20	Bridget Mc Nerney

Course/Meeting	Location	Date(s)	Attendee(s)
NAACA Annual Conference	Remote computer/phone	5/19/20	Bridget McNerney
49 IQ Training	Coralville	8/27/19	Chad Hines
Visible Emission Training	Des Moines	10/22/19	Chad Hines
Agilaire	Des Moines	10/29-10/30/19	Chad Hines
Defensive Driving	Des Moines	11/8/19	Chad Hines
NACAA Permitting and Enforcement Workshop	St. Louis - MO	2/25-2/27/20	Chad Hines
NACAA 2020 Virtual Spring Meeting	Online	5/18/20-5/19/20	Chad Hines
NSR/PSD Workshop	Online	6/8-6/12/20	Chad Hines
EPA – PM NAAQS	Online	6/1/20	Chad Hines

Attachment C. Summary of POLK Precision and Bias*

*Results from DNR's SLAMS certification review for 2019

PM_{2.5} FRM routine co-located pairs:

Goal for CV < 10.1%.

Polk 19-153-0030
4.19%

PM_{2.5} FRM PEP concentration pairs:

Is the "Bias" < 10.1%?

Polk 19-153-0030
-18.43%

PM_{2.5} FRM PEP concentration pairs: Is the absolute value of both LCL and UCL for "Bias" < 10.1%?

Polk 19-153-0030
-30.74% to -6.12%

PM₁₀ routine co-located pairs:

Goal for CV < 10.1%.

Polk 19-153-0030
6.93%

PM_{coarse} routine co-located pairs:

Goal for CV < 10.1%

Polk 19-153-0030
13.58%

Audit limits should fall into confidence limits obtained from routine checks. As a goal, ninety-five percent of the individual percent differences (all audit concentration levels, from all monitors) should be captured within the probability intervals for the same primary quality assurance organization (from bi-weekly checks done on all monitors). Yellow highlight indicates values <75%. (Note that this statistic does not account for the uncertainty in the known value of the audit gas, and the uncertainty in the known value of the routine calibration gas. Also, small and consistent percent differences during automated daily and manual bi-weekly checks narrow the confidence limits making it more difficult to attain the goal. (EPA dropped this assessment in their April 2016 revisions to 40 CFR Part 58.)

Pollutant	Polk
CO	58%
NO ₂	94%
Ozone	69%
PM _{2.5} (FRM & BAM)	75%
PM ₁₀ Discrete	88%

For bias, the sign should be neutral (+/-) instead of positive (+) or negative (-). The magnitude of the bias for pollutants other than ozone and NO₂ should be less than 10.1%. For NO₂ the magnitude of the bias should be less than 15.1%, and for ozone it should be less than 7.1%. The bias results for the POLK reporting organization are presented in the table below:

Pollutant	Sign of Bias	Magnitude of Bias
CO:	+/-	1.75%
NO ₂ :	+/-	2.66%
Ozone:	+/-	1.02%
PM _{2.5} FRM & BAM:	+/-	0.89%
PM ₁₀ Discrete:	+/-	1.22%
PM Coarse:	+/-	12.18%

All the bias signs were neutral. In addition, the magnitude of the bias almost always met the associated goal.

Attachment D

Polk County Comments and DNR Responses

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III. Construction Permitting and Dispersion Modeling Provisions

Modeling Comments: POLK staff trained in dispersion modeling exhibit an understanding of current EPA and DNR modeling guidelines, have the ability to perform and review dispersion modeling analyses, are able to use the modeling output to determine compliance with the applicable ambient air quality standards, and understand the strategies and control measures used to mitigate modeled exceedances of these standards.

POLK requests assistance from DNR in reviewing modeling analyses, as appropriate, and is encouraged to continue to contact DNR staff for assistance related to dispersion modeling. DNR will continue to assist POLK by conducting a quality assurance (QA) review of each modeling project conducted or reviewed by POLK. DNR will provide an updated QA checklist to use for this purpose.

The majority of the projects that were reviewed did not require a modeling analysis. Those that were modeled contained no modeling errors that would have negatively impacted the resulting permits.

There are several good items to note:

6. POLK continues to review the impact from air toxics.
7. Modeling determinations are well documented, especially as it relates to project emissions levels.
8. POLK correctly waives modeling analyses in cases where emission reductions offset new sources.
9. Previous applications are considered when determining if projects should be aggregated for modeling determinations.
10. POLK uses MERPs to address secondary formation.

Some areas for improvement include:

7. Verify use of correct version of the model (check settings in BEEST each time the model is run).
8. Verify that the current version of the meteorological data are used and that the correct base elevation is applied (there can be different versions of the same five-year set of meteorology; the newest version should be downloaded from the DNR website at the time of analysis).
9. Make sure to use the correct scale when inputting model objects (LCS Holdings).
10. Verify correct modeling information is provided in the record (the Siculus checklist in the record was for the previous project).
11. Follow up on revisions to modeling (Siculus) due to discrepancies noted during review of submitted analyses. Make sure final modeling files are included in the record.
12. Relaxation of the operating limits for intermittent sources needs to be considered when determining if modeling will be necessary for 1-hour NO₂ (DMMW).

Polk County Comment: [We agree with the findings and recommendations for improvement and have begun to implement the suggestions.](#)

DNR Response: No response or report changes are needed.

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V. Compliance and Inspection Provisions

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G. Data Management

Acceptable Corrective Action Needed Deficient Not evaluated

Comments:

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One of six facilities reviewed had the incorrect CMS source categories listed, thus creating incorrect inspection schedule dates within ICIS. During the 2018 audit, POLK indicated that the FCE inspection lists are being derived from the EnerGov database and not ICIS, so all inspections were done on time. DNR recommends that POLK compare the EnerGov list generated to the ICIS CMS schedule to determine if the CMS source category is correct. Four of the six facilities reviewed, Principal Life Insurance, Iowa EPS, MidAmerican Energy Sycamore, and Microsoft Corporation had pollutants missing or incorrectly identified in the required criteria pollutant list. These items need to be reviewed for completeness to ensure all pollutants for the facility are entered. DNR is requiring that POLK take corrective action to address these data management issues.

DNR has agreed to supply a screen shot ICIS manual that DNR follows to provide information in ICIS. Also, POLK requested training on the entry of Notice of Violations (NOVs) and Case Files which was conducted on October 15, 2020.

Data verification was discussed with POLK to ensure the efforts they are putting forth to update ICIS are being counted on the Federal level. Data verification is voluntary but a way to ensure data is being documented in the correct locations.

Plan Required

POLK will provide DNR with a written plan, specifically addressing how the CMS Category and facility criteria pollutants data will be corrected for the Major and SM80 facilities in the ICIS Database. This plan will include dates by which the identified deficiencies will be addressed. The written plan shall be submitted to DNR by January 1, 2021 or an alternatively agreed upon date. [**Note:** The due date for the written plan has been changed in the body of the Report from the date indicated above in response to POLK comments and DNR review, as explained below.]

Polk County Comments:

Polk County addressed the CMS category and facility criteria pollutant data in ICIS-Air for Major and SM80 facilities located in Polk County. A summary of pollutant classifications for Title V facilities are detailed in the table below.

DNR Response: No response or Report changes are needed.

Polk County Title V Major Facilities in ICIS-Air:

As of November 16, 2020, the Polk County Title V facility annual PTE by pollutant totals are shown in the table below. The compliance monitoring strategy (CMS) for Major facility criteria pollutants are updated to correspond with the major/minor pollutant designations provided by Title V staff and reported in ICIS-Air air pollutants categories.

DNR Response: No response or Report changes are needed.

AIRS #	FACILITY	PM10 TPY	SO2 TPY	NOX TPY	VOC (HAPs) ** TPY	CO TPY	Lead TPY
00530	A.D.M. 1935 E. Euclid Ave., Des Moines	145.68	163.94	363.97	853.16 (962.77)	171.31	0.57
03677	Quality Manufacturing Corp. 4300 Urbandale Drive, Urbandale	48.15	0.02	3.60	227.48 (24.40)	3.03	-
03199	Siegwerk USA, Inc. 129 SE 18 th Street, Des Moines	20.29	-	-	306.53 (2.94)	-	-
00147	Siegwerk USA, Inc. SW 56 th Street, Des Moines	5.23	0.29	5.19	104.01	3.39	0
00216	Construction Products 1625 E. Broadway, Des Moines	30.87	0.20	1.01	113.56 (89.11)	0.58	-
00380	Iowa EPS Products, Inc. 5554 NE 16 th Street, Des Moines	37.15	0.06	9.70	240.54 (3.41)	8.14	-
00250	Bridgestone Americas Tire 2 nd Avenue & Hoffman Road, Des Moines	947.08	18.58	351.77	684.20 (24.4)	213.15	-
00187	Des Moines Metropolitan Reclamation Waste Authority 3000 Vandalia Road, Des Moines	12.70	7.95	92.35	59.51 (10.57)	192.12	-
00390	John Deere Des Moines Works Highway 415 N., Ankeny	42.34	3.11	97.64	226.41 (15.66)	65.28	-
00387	MidAmerican: Pleasant Hill / GDMEC CTs 4401 Carlisle Road, Pleasant Hill	687.08	65.80	508.32	80.51 (11.40)	755.74	0.01
00386	MidAmerican: Sycamore CTs 6141 NW Beaver Dr., Johnston	1,747.62	3,914.80	6,990.60	17.82 (10.20)	696.06	0.12
00385	MidAmerican: River Hills CTs 2 nd and Grand Avenue, Des Moines	2,467.20	4,152.40	7,499.34	27.44 (10.80)	755.50	0.07
00490	CB&I Constructors, Inc. 9600 Hickman Road, Clive	441.22	-	-	639.51 (506.20)	-	-
00050	Titan Tire Corporation 2345 E. Market Street, Des Moines	318.57	1226.58	221.02	698.45 (82.01)	46.29	-
00851	Metro Methane Recovery 12161 12 th Ave. NE, Mitchellville	21.31	54.28	221.55	33.0 (13.70)	452.94	-
00426	Metro Park East Landfill 12181 12 th Ave. NE, Mitchellville	0	0	0	21.00 (13.30)	0	-
02874	Megellan Pipeline Co., L.P. 2503 SE 43 rd Street, Des Moines	8.43	0	3.90	392.92 (24.4)	4.37	-
02021	Principal Life Insurance Co. 616 10 th Street, Des Moines	11.65	98.59	255.85	9.90 (1.47)	55.12	-
02450	Siculus, Inc. 100 Share Way, Altoona	1.55	0.16	249.00	3.34 (0.16)	23.29	-

Polk County SM80 facilities in ICIS-Air:

As of November 17, 2020, Polk County has identified 309 SM80 facilities and staff is currently processing annual operating permit applications and will update out-of-business status and facility SM80 classification for inclusion in future CMS plans. A current Polk County SM80 list is provided in appendix D.

DNR Response: No response or Report changes are needed. Note that the POLK SM80 list is provided in **Attachment E** of the Final Report.

Polk County Comments for Plan Required: If DNR agrees that the deficiencies are corrected, in substitution of a written plan Polk County is working on creating an ICIS-Air SOP for CMS/facility/NOVs/Stack tests/Case Files/Air Programs workflows to help ensure future data entry compliance and anticipates a draft version will be completed by February 29, 2021 for Iowa DNR review.

DNR Response: DNR agrees with POLK's approach. However, POLK shall submit a separate written plan to DNR by **February 1, 2021** (or an agreed upon alternative date), detailing the approach and deadline that POLK has proposed in the above comment. DNR has updated the body of the Final Report to indicate the revised due date for POLK's plan.

VI. Ambient Air Monitoring Provisions

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C. Finding/Recommendation #3:

Finding: Prior to the last DNR audit, POLK replaced their mechanical Wind Speed and Wind Direction sensors with ultrasonic sensors. Ultrasonic wind sensors are a newer technology compared to the traditional sensors that use a vane to measure wind direction and rotating cups to measure speed. EPA rules for checks and audits were relatively straight forward and well worked out for traditional WS/WD sensors. However, the QC/QA criteria for ultrasonic sensors is still onerous and in a process of development.

POLK noted that that Met One Instruments no longer makes the model 50.5 ultrasonic WS/WD sensors they are currently using. The current POLK budget allocates 10K for purchasing "meteorological sensors". POLK indicated that this refers to purchasing a suitable replacement for the ultrasonic WS/WD sensors (rather than temperature or humidity probes). POLK is uncertain at this point who the vendor will be. The current POLK budget also allocates 8K for vendor training. POLK has not yet identified a focus for this training. (POLK indicated that at this point, in person training will probably not be an option because of the Corona virus pandemic.)

Recommendation: DNR suggested that POLK consider training on the ultrasonic met sensors, from the vendor they will be getting them from. POLK should collaborate with DNR to identify an appropriate training topic for the current fiscal year.

Polk County Comments: Polk County will continue to research the WS/WD sensors available. Once a new sensor has been chosen Polk County will coordinate with IDNR on specific training for sensors.

DNR Response: No response or Report changes are needed.

D. Finding/Recommendation #4:

Finding: In 2017, EPA expanded the options for the types of QC/QA data that the AQS national database stores for gas analyzers. When a check is performed, both the calibration system and the analyzer might be functioning properly, but there are two other possible scenarios.

- Scenario #1: the calibration system is working, and the analyzer is not.
- Scenario #2: the calibration system is malfunctioning, and therefore the analyzer only appears to "fail" Redbook acceptance criteria.

Prior to 2017, Iowa Reporting Organizations didn't record either of these two cases in the precision check portion of AQS. EPA issued a memo with coding guidance in August 2017, and DNR asked its reporting organizations to implement the memo starting at the beginning of 2018.

The memo indicated that for the first scenario, the AMP 504 should show both the known and measured check concentrations without a null code, while data is withheld from the AMP 501 using a null code. For scenario #2, the AMP 504 should show neither check concentration, and a "1C" null code; while the AMP 501 will show valid raw data. POLK implemented the memo starting at the beginning of 2018.

Recommendation: DNR requests that POLK continue to follow the memo for data collected in 2020. Although excessive use of the "1C" flag is not a problem in Polk County, DNR indicated that the "1C" flag is not appropriate in cases where the check was not even initiated. (This would be especially true for a multi-day interval, where it's

established after the first day that the equipment is not functional.) For single day instances, if a check was started and it failed midway through the check, the 1C flag may be appropriate on a case by case basis.

Polk County Comments: Polk County agrees with this recommendation

DNR Response: No response or Report changes are needed.

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F. Finding/Recommendation #6:

Finding: An issue that was mentioned in both of the last two SHL TSA audits of POLK was to resume and standardize the document change log procedure, especially for SOPs. In January 2020, POLK created two files for documenting changes to their Ozone and NO2 SOPs. These were files that were separate from the SOP's themselves and were stored on a Polk County shared drive. A few weeks ago, POLK forwarded copies of these to files to DNR. Some changes were made to SOPs (e.g. the BAM 1022 SOP) that were not recorded in a log. POLK indicated that this suggestion had been met with some resistance in their organization, and thought that another option might be submitting SOPs with track changes enabled.

Recommendation: DNR requests that POLK adopt either of the following two options, in response to SHL's suggestion to initiate a document change log:

- One option would be to add a concise summary of substantive changes somewhere in the SOP, QAPP, or QMP itself (e.g. either immediately after the Table of Contents or at the end). This approach may save POLK staff time in tracking revisions. (DNR provided POLK with an example of a log of changes from a Linn County BAM SOP during the audit.)
- Alternatively, in future submissions of QA documents to DNR, POLK would submit two versions of each document. One version would be in MS Word format showing tracked changes since the last version sent to the DNR. A second copy would be "clean" and with all changes accepted.

Polk County Comments: Polk County has already instituted the document change log to several SOPs. Polk County will continue to create one for each document.

DNR Response: No response or Report changes are needed.

G. Finding/Recommendation #7:

Finding: Each year (typically in December) POLK performs an on-site SOP operator review where POLK's own QA officer compares procedures actually used in the field to the written procedures in the SOPs. In this internal audit, the POLK QA officer indicated that POLK needs to continue working on developing the 49iQ SOP.

The POLK network currently utilizes two generations of Thermo ozone analyzers (the older "i" series, and the newest "iQ" series). In mid-June 2020, all of POLK's field analyzers were iQ series, while the older "i" series were used as ozone calibrators. Since June, POLK had to withdraw its iQ field analyzers from the Health Dept. and the only iQ units currently in the POLK network are two collocated field analyzers at Sheldahl.

In the summer of 2020, DNR (in conjunction with SHL & Thermo) observed erratic behavior in the 1-minute concentration averages when the trailer temperature was close to the ambient dew point. This problem was characteristic of some 49iQ analyzers, but was generally not a problem for older "i" series. Due to the unreliability of the new "iQ" series ozone analyzers, SHL always uses an older "i" series as the primary monitor, and deploys the less reliable "iQ" monitors only as a secondary monitor.

In April 2020, POLK submitted only one SOP related to Ozone. It references both 49i as well as 49iQ instruments. Forms 5 and 10 are Field Sheets that have separate fields for the flow through cell A and cell B [see box labeled "Diagnostic Check (Site Analyzer)"]. While this is appropriate for the 49i transfer standards, the 49iQ field analyzers no longer have separate flow sensors for each cell. The acceptable flow rate on Forms 5 and 10 is given as 0.4-1.6 LPM. Although this applies to the 49i instruments, the 49iQ flow rate would be higher (1.0-2.5 LPM) since it is the sum of the flow through both cells. (The same issue probably arises with respect to Form 7, although it's less clear if it's in reference to the monitor that collects the raw data, the transfer standard, or both.) Section 3.10.1.2 refers to a yearly verification of the pressure sensors, but does not provide any acceptable limits.

Other states also saw problems with the “iQ” series during times when the ambient dew point was near the trailer temperature. It’s anticipated that EPA will release a memo approving the use of Nafion dryers (to dry the ambient air going into ozone analyzers). The memo is expected to indicate that the addition of such a drier will not void the Federal Equivalency status of the monitors.

Recommendation: DNR encouraged POLK to continue the development and finalization of SOPs and Field Data Sheets that adequately account for the differences between the two generations of Thermo model 49 ozone analyzers. DNR suggests that POLK continue to communicate with the DNR, Thermo, and EPA and monitor developments for resolving the 49iQ problems. DNR also requests that Polk deploy a 49i as the primary at Sheldahl until the 49iQ issues are resolved. The design value at Sheldahl might be lost if both 49iQ’s experience oscillations in the 1-minute data.

Polk County Comments: Polk County currently has two separate SOPs for the ozone monitors. Polk County will update field sheets for 49 iQ parameters. Starting with the 2021 Ozone season, Polk County will have a 49i deployed at Sheldahl for the primary monitor.

DNR Response: POLK is correct in stating that they submitted two ozone SOPs on April 30, 2020. (The first submission of their Annual Review in March 2020 contained some outdated documents and included only one ozone SOP which appears to apply to both the 49i and 49iQ.) The second submission of Polk’s Annual Review (from April 30, 2020) contained two ozone SOPs, one pertaining exclusively to the 49i series, and another with a file name of “Ozone 49iQ SOP 2020”. The body of the Final Report, third paragraph in Finding/Recommendation #7, has been updated for the changes shown below. DNR apologizes for any confusion in DNR’s Finding.

~~In April, 2020 POLK submitted only one SOP related to Ozone. It references both 49i as well as 49iQ instruments. In April 2020, POLK submitted an SOP related to Ozone with a file name of “Ozone 49iQ SOP 2020”. It references both 49i as well as 49iQ instruments (although references to the former appear to be limited to the transfer standards). Forms 5 and 10 are Field Sheets that have separate fields for the flow through cell A and cell B [see box labeled “Diagnostic Check (Site Analyzer)”]. While this is appropriate for the 49i transfer standards, the 49iQ field analyzers no longer have separate flow sensors for each cell. The acceptable flow rate on Forms 5 and 10 is given as 0.4-1.6 LPM. Although this applies to the 49i instruments, the 49iQ flow rate would be higher (1.0-2.5 LPM) since it is the sum of the flow through both cells. (The same issue probably arises with respect to Form 7, although it’s less clear if it’s in reference to the monitor that collects the raw data, the transfer standard, or both.) Section 3.10.1.2 refers to a yearly verification of the pressure sensors, but does not provide any acceptable limits.~~

H. Finding/Recommendation #8:

Finding: There were a few other changes recommended by the POLK QA officer as a result of matching procedures used in the field to the written procedures in the SOPs.

- Two changes were requested, and made, to the BAM 1022 SOP.
- The QA officer referenced a section of POLK’s SOP for wind speed sensors, and noted that the units for the wind speed span test should be MPH rather than meters per second. In the SOP that DNR received in April 2020, the units are still m/s.
- The QA officer also noted that an update should be made in the SOP for discrete PM2.5 and PM10 samplers. This was in reference to adding information and instructions about “new automated data collection procedures for data validation”. The specific section of the SOP the QA officer referred to (Section 4.14 on Validation and Reporting of Data) was not updated in the SOP that DNR received in April 2020.

Recommendation: POLK should verify what the appropriate units are for the wind speed span test and update the SOP as necessary. POLK should also add information and instructions about new automated data collection procedures for data validation to their SOP for discrete PM2.5 and PM10 samplers.

Polk County Comments: Polk County will update the SOPs to reflect the changes found during SOP operator reviews.

DNR Response: No response or Report changes are needed.

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Polk Comments and DNR Responses for Attachment A

The following general issues were noted:

- 1) Plant-wide synthetic minor limits need to account for all emissions from the facility, either through recordkeeping or specific limits. For sources that use recordkeeping and have VOC or HAP-emitting sources (such as boilers or welding) along with surface coating, a facility may find it helpful if the recordkeeping excludes non-surface coating emissions, with the surface-coating limit adjusted as necessary to keep them a synthetic minor.
Polk Comments: When facility wide emission limits are included for VOC and HAP emissions, sources that can be subtracted out from facility wide totals and their associated recordkeeping requirements will be excluded.
DNR Response: No response or Report changes are needed.
- 2) Emission calculations should not be based on an expected outlet concentration from a control device. Instead, emission factors such as AP-42 should be used, with the expected control device efficiency used to determine if the emission unit can meet the emission limit set in the permit.
Polk Comments: Moving forward, we will use emission factors to evaluate emission limits.
DNR Response: No response or Report changes are needed.
- 3) If a company is currently not subject to a NESHAP because it is not using a target HAP, DNR suggests either adding an operating condition forbidding the use of the target HAP, or else noting that the company is not subject to the NESHAP unless it is using the target HAP.
Polk Comments: When applicable, it is our intention to include an operating condition as stated above. It would only be excluded as an oversight. We will be more diligent about making sure this condition is included moving forward.
DNR Response: No response or Report changes are needed.

The following are permit specific issues:

Facility Name:

Flint Hills Resources – Permit 3484. The header of the emission limit table “The following emission limits shall not be exceeded: For Temporary Emission Units: FT-1 – FT-12 GB-1 and PT-1” could be read as meaning the limit is for each unit rather than as a combined limit.

Polk Comments: The header will be changed to clarify that the limit applies to all combined units.

DNR Response: No response or Report changes are needed.

Helena Industries – General comments. DNR understands that Helena Industries intends to switch operating conditions from each permit with a specific HAP limit to a plantwide HAP limit. In these cases, DNR recommends modifying all affected permits in one project. This ensures that the operating limits do not conflict with each other and are consistent across the plant. DNR also notes that a facility might find it useful to eliminate sources with minimal HAP emissions, such as natural gas boilers, from facility wide calculations. For example, if combustion sources at a facility have a PTE of 0.1 tpy HAP, set the facility wide limit at 9.3 and 24.3 tpy HAP and specify that limit as for non-combustion sources only. If POLK has any questions about how to handle complex projects such as this, Gary Smith of the DNR would be happy to help. POLK can also bring up any questions at DNR’s regular staff meetings.

Polk Comments: Helena’s Operating Permit will be revised to insert facility wide HAP limits where applicable, subtracting out minor combustion sources. If problems are found with these revisions, Gary Smith will be contacted for assistance.

DNR Response: No response or Report changes are needed.

Quick Steel Fabricators – Permit 3426. In the evaluation, the allowable limit for the unit should not be used as an emission factor.

Polk Comments: Moving forward, we will use emission factors to evaluate emission limits.

DNR Response: No response or Report changes are needed.

Quick Steel Fabricators – Permits 3425 and 3427. Permit 3425 has a single HAP/total HAP limit of 0.07 tpy. Permit 3427 has a material usage limit of 2,000 gal/yr with a single HAP limit of 9.4 lbs/gal and a total HAP limit of 24.4 lbs/gal. DNR would recommend rewriting the material usage limit to 9.33 lb single HAP/gal and 24.33 lb total HAP/gal, in order to keep the facility a synthetic minor.

Polk Comments: Permits will be revised per your recommendation.

DNR Response: No response or Report changes are needed.

Modeling Comments

DMMW:

Permits 2890mod and 2891mod: The annual tpy was well below 40, and the lb/hr rate was not changing, but this project relaxed the operating limit to 1000 hr/yr. The original permitting for these sources relied on the assumption that these were intermittent sources (1-hour NOx was not evaluated). The new operating limit excluded these sources from being classified as intermittent. The full hourly emission rates from these sources should have been compared to the short term SER (9.13 lb/hr). This project should have been modeled for NO₂. It is possible that this error has since been somewhat offset by emissions reductions in permits 2888 Modified and 2889 Modified.

Polk Comments: The facility is planning to submit permit modifications for the four generators so that they all have a 500 hour/year limit and are all intermittent sources.

DNR Response: No response or Report changes are needed.

Attachment E

Polk County-Identified CMS 80% SM Facilities

Polk Comments: As of November 17, 2020, Polk County has identified 309 SM80 facilities and staff is currently processing annual operating permit applications and will update out-of-business status and facility SM80 classification for inclusion in future CMS plans.

AIRName	SourceID	AIRStreet	AIRCity	AIRState	AIRCmsCategoryDesc
ABSOLUT DRY CLEANERS	IAPLK0001915304060	917 E 1ST ST	ANKENY	IA	80% Synthetic Minor
ACHESON AUTO BODY	IAPLK0001915303028	1103 SW 63RD ST	DES MOINES	IA	80% Synthetic Minor
ACHESON AUTO WORKS	IAPLK0001915303030	8000 UNIVERSITY BLVD	DES MOINES	IA	80% Synthetic Minor
ADOCAR AUTOBODY & PAINT	IAPLK0001915303848	1605 E MADISON	DES MOINES	IA	80% Synthetic Minor
AIRGAS USA LLC	IAPLK0001915303052	410 SE CREEKVIEW DR	ANKENY	IA	80% Synthetic Minor
ALTOONA AUTO BODY INC	IAPLK0001915303070	501 1ST AVE N	ALTOONA	IA	80% Synthetic Minor
ALTOONA, CITY OF	IAPLK0001915302108	901 17 AVENUE SW	ALTOONA	IA	80% Synthetic Minor
AMERICAN AND FOREIGN BODYWORKS	IAPLK0001915303075	2812 4TH ST	DES MOINES	IA	80% Synthetic Minor
AMERICAN CONTRACT SYSTEMS INC	IAPLK0001915300022	1601 SE GATEWAY DR. SUITE 120	GRIMES	IA	80% Synthetic Minor
ANKENY AUTO BODY INC	IAPLK0001915303084	1501 SE CORTINA DR	ANKENY	IA	80% Synthetic Minor
ANKENY CLEANERS	IAPLK0001915304080	122 S ANKENY BLVD	ANKENY	IA	80% Synthetic Minor
ANKENY GLASS, INC	IAPLK0001915301049	6335 NE INDUSTRY DR.	DES MOINES	IA	80% Synthetic Minor
APE CONGNITION AND COMMUNICATION INSTITUTE	IAPLK0001915302134	4200 EVERGREEN AVE	DES MOINES	IA	80% Synthetic Minor
ARAMARK UNIFORM & CAREER APPAREL	IAPLK0001915300418	2500 DELAWARE AVE	DES MOINES	IA	80% Synthetic Minor
ARNOLD MOTOR SUPPLY	IAPLK0001915303002	610 N ANKENY BLVD	ANKENY	IA	80% Synthetic Minor
ARTISTIC IRON WORKS	IAPLK0001915300052	519 SE 4 STREET	DES MOINES	IA	80% Synthetic Minor
AT & T	IAPLK0001915300056	4157 109TH ST	URBAN DALE	IA	80% Synthetic Minor
ATLANTIC BOTTLING COMPANY	IAPLK0001915302177	3600 ARMY POST RD	DES MOINES	IA	80% Synthetic Minor
ATM TED'S BODY SHOP INC	IAPLK0001915303011	1007 8TH ST. SW	ALTOONA	IA	80% Synthetic Minor
AUTO CARE LLC DBA MINOR WRECK EXPRESS	IAPLK0001915303078	5530 NW BEAVER DR UNIT 400	JOHNSTON	IA	80% Synthetic Minor
BARTON SOLVENTS INC	IAPLK0001915300060	1970 NE BROADWAY	DES MOINES	IA	80% Synthetic Minor
BERGLAND SHEET METAL CONTRACTORS INC	IAPLK0001915300070	10210 DENNIS DRIVE	URBAN DALE	IA	80% Synthetic Minor
BERKLEY TECHNOLOGY SERVICES	IAPLK0001915302005	3840 109TH ST	URBAN DALE	IA	80% Synthetic Minor
BICKEL MOTORS	IAPLK0001915303164	2507 NE 46TH AVE	DES MOINES	IA	80% Synthetic Minor
BLAKE'S AUTO BODY & EXHAUST	IAPLK0001915303903	1210 E 29TH ST	DES MOINES	IA	80% Synthetic Minor
BOB BROWN CHEVROLET	IAPLK0001915303189	3600 111TH ST	URBAN DALE	IA	80% Synthetic Minor
BODY PARTS STORE, THE	IAPLK0001915300018	1865 NE 54TH AVE	DES MOINES	IA	80% Synthetic Minor
BOMBELA HOLDING COMPANINES, LLC DBA UNITED TRUCK & BODY	IAPLK0001915303869	5129 NE 17TH ST	DES MOINES	IA	80% Synthetic Minor
BONDURANT AUTO BODY	IAPLK0001915303169	3300 HENRY ST SW STE 6	BONDURANT	IA	80% Synthetic Minor
BORGEN SYSTEMS	IAPLK0001915300650	1901 BELL AVE	DES MOINES	IA	80% Synthetic Minor
BRAD'S COLLISION CENTER INC	IAPLK0001915303087	4700 SE 14TH ST	DES MOINES	IA	80% Synthetic Minor
BRIGGS MEDICAL SERVICE COMPANY	IAPLK0001915300335	7855 UNIVERSITY BLVD	DES MOINES	IA	80% Synthetic Minor
BROADLAWNS MEDICAL CENTER	IAPLK0001915301046	1801 HICKMAN RD	DES MOINES	IA	80% Synthetic Minor
BUCKEYE TERMINALS LLC-DES MOINES	IAPLK0001915303076	1501 NW 86 STREET	WEST DES MOINES	IA	80% Synthetic Minor
BUD LEMKE MASONRY	IAPLK0001915303082	5805 NW 54TH CT	JOHNSTON	IA	80% Synthetic Minor
CABRERA'S AUTO BODY	IAPLK0001915303300	4425 NW 2ND ST	DES MOINES	IA	80% Synthetic Minor
CAMPUS CLEANERS	IAPLK0001915304135	3401 UNIVERSITY AVE	DES MOINES	IA	80% Synthetic Minor
CAPTIVE PLASTICS LLC	IAPLK0001915300295	2201 BELL AVENUE	DES MOINES	IA	80% Synthetic Minor
CAR MAX #6004	IAPLK0001915303020	10315 HICKMAN RD	URBAN DALE	IA	80% Synthetic Minor
CARDINAL CLEANERS INC	IAPLK0001915304241	1245 21ST STREET	DES MOINES	IA	80% Synthetic Minor
CARNOCK CREATIONS., LLC	IAPLK0001915303293	4905 HUBBELL AVE.	DES MOINES	IA	80% Synthetic Minor
CEDAR VALLEY CORP LLC	IAPLK0001915300035	PORTABLE	DES MOINES	IA	80% Synthetic Minor
CENTRAL SERVICE & SUPPLY INC	IAPLK0001915300208	4219 E 50TH ST	DES MOINES	IA	80% Synthetic Minor
CENTURY TRUCK & BODY	IAPLK0001915303261	4554 NE 22ND ST	DES MOINES	IA	80% Synthetic Minor
CENTURYLINK	IAPLK0001915300997	4550 CARLISLE ROAD	DES MOINES	IA	80% Synthetic Minor
CENTURYLINK	IAPLK0001915300775	101 SE 7TH ST	DES MOINES	IA	80% Synthetic Minor
CENTURYLINK	IAPLK0001915302664	2103 E UNIVERSITY	DES MOINES	IA	80% Synthetic Minor
CENTURYLINK	IAPLK0001915302665	925 HIGH_ST	DES MOINES	IA	80% Synthetic Minor
CENTURYLINK	IAPLK0001915302663	6008 SW 9TH ST	DES MOINES	IA	80% Synthetic Minor
CENTURYLINK	IAPLK0001915302667	3841 70TH ST	URBAN DALE	IA	80% Synthetic Minor
CENTURYLINK	IAPLK0001915302668	1051 35TH ST	WEST DES MOINES	IA	80% Synthetic Minor
CHAMNESS TECHNOLOGY INC	IAPLK0001915302128	PORTABLE	DES MOINES	IA	80% Synthetic Minor
CHARLES GABUS FORD	IAPLK0001915304023	4410 MERLE HAR RD	URBAN DALE	IA	80% Synthetic Minor
CHARLES GABUS FORD INC	IAPLK0001915303371	4545 MERLE HAY ROAD	DES MOINES	IA	80% Synthetic Minor

AIRName	SourceID	AIRStreet	AIRCity	AIRState	AIRCmsCategoryDesc
CHEMORSE LTD	IAPLK0001915300163	1650 NE 58TH AVE	DES MOINES	IA	80% Synthetic Minor
CHESTNUT SIGN CO INC	IAPLK0001915303238	971 NE BROADWAY	DES MOINES	IA	80% Synthetic Minor
CITY OF WEST DES MOINES PUBLIC SERVICES	IAPLK0001915303066	227 63RD ST.	DES MOINES	IA	80% Synthetic Minor
CLARKLIFT OF DES MOINES INC	IAPLK0001915303245	1625 E EUCLID AVE	DES MOINES	IA	80% Synthetic Minor
COGNIZANT	IAPLK0001915303162	666 GRAND AVE	DES MOINES	IA	80% Synthetic Minor
COLOR KING	IAPLK0001915303626	2910 E 9TH ST	DES MOINES	IA	80% Synthetic Minor
CONTINENTAL CEMENT	IAPLK0001915302238	275 S 11TH ST	WEST DES MOINES	IA	80% Synthetic Minor
COOPER WOODWORKING	IAPLK0001915303085	302 SE 2ND ST	GRIMES	IA	80% Synthetic Minor
CORN STATES METAL FABRICATORS INC	IAPLK0001915300143	1323 MAPLE ST	WEST DES MOINES	IA	80% Synthetic Minor
CORRELL RECYCLING	IAPLK0001915300139	1300 LINCOLN ST	WEST DES MOINES	IA	80% Synthetic Minor
COUNTRY CABOOSE REFINISHING	IAPLK0001915303262	113 5TH STREET	WEST DES MOINES	IA	80% Synthetic Minor
CREATIVE WERKS INC	IAPLK0001915303119	1430 E FLEMING AVE	DES MOINES	IA	80% Synthetic Minor
CREATIVISON, INC. DBA PERFORMANCE DISPLAY & MILLWORK	IAPLK0001915300320	1400 SE 11TH ST	GRIMES	IA	80% Synthetic Minor
CROWN CLEANERS INC	IAPLK0001915304401	5018 EP TRUE PARKWAY	WEST DES MOINES	IA	80% Synthetic Minor
CRYSTAL KLEAR BODY SHOP	IAPLK0001915303470	65 NW 46TH AVE	DES MOINES	IA	80% Synthetic Minor
CUSTOM CABINETS OF IOWA INC	IAPLK0001915303235	2006 SE HULSIZER	ANKENY	IA	80% Synthetic Minor
CUSTOM CONVEYOR & EQUIPMENT CORP	IAPLK0001915300217	109 1ST ST	POLK CITY (HISTORICAL)	IA	80% Synthetic Minor
CUSTOM FINISH AUTO BODY	IAPLK0001915303282	550 NE 46TH AVE	DES MOINES	IA	80% Synthetic Minor
CUSTOM FIRESCREEN INC	IAPLK0001915303285	108 JEFFERSON AVE	DES MOINES	IA	80% Synthetic Minor
D & J PLATING INC	IAPLK0001915300183	206 SE MAGAZINE RD	ANKENY	IA	80% Synthetic Minor
DALI INC	IAPLK0001915304700	779 N HICKORY BLVD	PLEASANT HILL	IA	80% Synthetic Minor
DEE ZEE	IAPLK0001915303290	1572 NE 58 AVE	DES MOINES	IA	80% Synthetic Minor
DEERFIELD RETIREMENT COMMUNITY	IAPLK0001915302362	13731 HICKMAN RD	URBANDALE	IA	80% Synthetic Minor
DELAVAN INC	IAPLK0001915300170	2200 DELAVAN DRIVE	WEST DES MOINES	IA	80% Synthetic Minor
DELAVAN, INC.	IAPLK0001915300171	811 4TH ST	WEST DES MOINES	IA	80% Synthetic Minor
DENT ELIMINATORS	IAPLK0001915303378	5913 MEREDITH DRIVE	URBANDALE	IA	80% Synthetic Minor
DENT ELIMINATORS INC	IAPLK0001915303380	2121 114TH ST	CLIVE	IA	80% Synthetic Minor
DES MOINES AREA COMMUNITY COLLEGE	IAPLK0001915302016	2006 S ANKENY BOULEVARD	ANKENY	IA	80% Synthetic Minor
DES MOINES AREA REGIONAL TRANSIT AUTH	IAPLK0001915300144	1100 DART WAY	DES MOINES	IA	80% Synthetic Minor
DES MOINES DIESEL INC	IAPLK0001915303291	3211 DELAWARE AVE	DES MOINES	IA	80% Synthetic Minor
DES MOINES FEED COMPANY	IAPLK0001915300185	2010 & 2015 HUBBELL AVE	DES MOINES	IA	80% Synthetic Minor
DES MOINES INTERNATIONAL AIRPORT	IAPLK0001915302190	5800 FLEUR DR	DES MOINES	IA	80% Synthetic Minor
DES MOINES PUBLIC SCHOOLS - CENTRAL	IAPLK0001915301040	1800 GRAND AVE	DES MOINES	IA	80% Synthetic Minor
DES MOINES PUBLIC SCHOOLS - OPERATIONS	IAPLK0001915302176	1917 DEAN AVE	DES MOINES	IA	80% Synthetic Minor
DES MOINES RADIO GROUP	IAPLK0001915302428	1200 NE 126TH ST.	ALLEMAN	IA	80% Synthetic Minor
DES MOINES UNIVERSITY	IAPLK0001915301005	3200 GRAND AVE	DES MOINES	IA	80% Synthetic Minor
DES MOINES WATER WORKS	IAPLK0001915302248	12223 MAFFITT LAKE RD	DES MOINES	IA	80% Synthetic Minor
DES MOINES WATER WORKS	IAPLK0001915302249	6500 NW 26TH ST	DES MOINES	IA	80% Synthetic Minor
DES MOINES WATER WORKS	IAPLK0001915301039	5470 WILLOW CREEK AVE	WEST DES MOINES	IA	80% Synthetic Minor
DES MOINES WATER WORKS	IAPLK0001915302247	408 FLEUR DR	DES MOINES	IA	80% Synthetic Minor
DES MOINES, CITY OF	IAPLK0001915302975	1313 SE 1SR ST	DES MOINES	IA	80% Synthetic Minor
DES MOINES, CITY OF	IAPLK0001915302973	1413 SE 4TH ST	DES MOINES	IA	80% Synthetic Minor
DES MOINES, CITY OF	IAPLK0001915300266	1813 2ND AVE	DES MOINES	IA	80% Synthetic Minor
DES MOINES, CITY OF	IAPLK0001915303241	212 SE RACCOON ST	DES MOINES	IA	80% Synthetic Minor
DES MOINES, CITY OF	IAPLK0001915302971	210 SE 1ST ST	DES MOINES	IA	80% Synthetic Minor
DES MOINES, CITY OF	IAPLK0001915300859	1609 SE 9TH ST	IOWA	IA	80% Synthetic Minor
DEWEY COLLISION CENTER	IAPLK0001915302939	3225 SE DELAWARE AVE.	ANKENY	IA	80% Synthetic Minor
DEWEY FORD INC	IAPLK0001915303315	3055 SE DELAWARE AVE	ANKENY	IA	80% Synthetic Minor
DIAMOND ANIMAL HEALTH	IAPLK0001915300205	2538 SE 43RD ST	PLEASANT HILL	IA	80% Synthetic Minor
DIAMOND OIL COMPANY	IAPLK0001915305080	310 SE 7TH ST	DES MOINES	IA	80% Synthetic Minor
DICO INC	IAPLK0001915300210	200 SW 16TH ST	DES MOINES	IA	80% Synthetic Minor
DONIS AUTO BODY SHOP	IAPLK0001915303950	5701 NW 2ND AVE	DES MOINES	IA	80% Synthetic Minor
DRAKE UNIVERSITY	IAPLK0001915302304	2817 FOREST AVE	DES MOINES	IA	80% Synthetic Minor
DYNAMIC AUTO DETAILING, LLC. DBA AUTO ARTISTS	IAPLK0001915302387	6055 AURORA AVE	URBANDALE	IA	80% Synthetic Minor
EAGLE SIGN CO	IAPLK0001915303329	605 SW 37TH ST.	DES MOINES	IA	80% Synthetic Minor
EDGE BUSINESS CONTINUITY CENTER LLC	IAPLK0001915300227	1435 NORTHRIDGE CIRCLE NE	ALTOONA	IA	80% Synthetic Minor
ELECTRICAL ENGINEERING & EQUIPMENT CO	IAPLK0001915300218	1808 DELAWARE	DES MOINES	IA	80% Synthetic Minor
ELECTRICAL POWER PRODUCTS	IAPLK0001915303098	4240 ARMY POST RD	DES MOINES	IA	80% Synthetic Minor
EMPLOYERS MUTUAL CASUALTY CO	IAPLK0001915302361	700 & 717 MULBERRY 700 WALNUT	DES MOINES	IA	80% Synthetic Minor
EUROFINS SCIENTIFIC INC	IAPLK0001915300206	2200 RITTENHOUSE ST STE 175	DES MOINES	IA	80% Synthetic Minor
EXTREME AUTO BODY	IAPLK0001915302386	655 NE BROADWAY	DES MOINES	IA	80% Synthetic Minor
FAUST BODY SHOP INC	IAPLK0001915303350	1824 2ND AVENUE	DES MOINES	IA	80% Synthetic Minor
FERRELLGAS	IAPLK0001915300248	4415 NE 14TH ST	DES MOINES	IA	80% Synthetic Minor
FINASTRA	IAPLK0001915302420	13300 HICKMAN ROAD STE 100	CLIVE	IA	80% Synthetic Minor

AIRName	SourceID	AIRStreet	AIRCity	AIRState	AIRCmsCategoryDesc
FINE LINE WOODWORKS INC	IAPLK0001915303355	1008 2ND ST NE	BONDURANT	IA	80% Synthetic Minor
FINISHLINE BODY & PAINT INC	IAPLK0001915303367	1001 N MAIN STREET SUITE D	GRIMES	IA	80% Synthetic Minor
FISHER BODY PAINT INC	IAPLK0001915303364	1955 E HUBBELL	DES MOINES	IA	80% Synthetic Minor
FOOD BANK OF IOWA	IAPLK0001915302443	2220 E. 17TH ST.	DES MOINES	IA	80% Synthetic Minor
FORTERRA	IAPLK0001915300161	2825 MAURY STREET	DES MOINES	IA	80% Synthetic Minor
FURNITURE PROFESSIONALS, THE	IAPLK0001915303332	5346 MERLE HAY RD	URBAN DALE	IA	80% Synthetic Minor
GABUS AUTOMOTIVE	IAPLK0001915300860	4475 MERLE HAY RD	DES MOINES	IA	80% Synthetic Minor
GATR OF DES MOINES	IAPLK0001915303670	1517 EAST AURORA	DES MOINES	IA	80% Synthetic Minor
GENERAL MILLS OPERATIONS INC	IAPLK0001915300280	6101 SE 52ND ST	CARLISLE	IA	80% Synthetic Minor
GRACE LABEL INC	IAPLK0001915300296	6201 WATROUS AVE	DES MOINES	IA	80% Synthetic Minor
GRAHAM BODY SHOP	IAPLK0001915303805	4730 MERLE HAY RD	DES MOINES	IA	80% Synthetic Minor
GRAHAM COLLISION CENTER	IAPLK0001915303170	10168 HICKMAN COURT	CLIVE	IA	80% Synthetic Minor
GRAHAM GROUP	IAPLK0001915303460	6812 SE DELAWARE AVE	ANKENY	IA	80% Synthetic Minor
GRIMES ASPHALT & PAVING	IAPLK0001915300268	2118 NE 51ST PL	DES MOINES	IA	80% Synthetic Minor
GRIMES, CITY OF	IAPLK0001915302104	1801 N JAMES ST	GRIMES	IA	80% Synthetic Minor
GUIDEONE INSURANCE	IAPLK0001915302930	1025 & 1111 ASHWORTH RD	WEST DES MOINES	IA	80% Synthetic Minor
HALL'S AUTO BODY	IAPLK0001915303400	4995 NW 6TH DR	DES MOINES	IA	80% Synthetic Minor
HALLETT MATERIALS	IAPLK0001915300304	1300 SE 36TH ST	DES MOINES	IA	80% Synthetic Minor
HALLETT MATERIALS	IAPLK0001915300298	PORTABLE	POLK COUNTY	IA	80% Synthetic Minor
HANSSSEN'S COMMERCIAL LAUNDRY SERVICE	IAPLK0001915304506	2545 1/2 E EUCLID	DES MOINES	IA	80% Synthetic Minor
HARVEY PALLETS, INC	IAPLK0001915300037	2420 GRAND AVE	WEST DES MOINES	IA	80% Synthetic Minor
HAWK METAL PRODUCTS INC	IAPLK0001915303420	625 S 19TH ST	WEST DES MOINES	IA	80% Synthetic Minor
HEARTLAND COOP	IAPLK0001915300219	4300 NE 94TH AVE	ELKHART	IA	80% Synthetic Minor
HEARTLAND COOP	IAPLK0001915300234	118 SE 18TH ST	DES MOINES	IA	80% Synthetic Minor
HEARTLAND COOP	IAPLK0001915300231	204 E HANCOCK ST	RUNNELLS	IA	80% Synthetic Minor
HEARTLAND COOP	IAPLK0001915300235	5550 E 64TH ST	CARLISLE	IA	80% Synthetic Minor
HELENA AGRI-ENTERPRISES, LLC	IAPLK0001915302385	4546 CORPORATE DR STE 170	WEST DES MOINES	IA	80% Synthetic Minor
HELENA INDUSTRIES, LLC	IAPLK0001915300310	3525 VANDALIA ROAD	DES MOINES	IA	80% Synthetic Minor
HOLMES RADIATOR, LLC	IAPLK0001915303422	1616 NE BROADWAY	DES MOINES	IA	80% Synthetic Minor
HOLT SALES AND SERVICE LLC	IAPLK0001915302934	2345 DEAN AVE	DES MOINES	IA	80% Synthetic Minor
HOWARD MARTIN AUTO BODY	IAPLK0001915303560	3700 SW 61ST ST	DES MOINES	IA	80% Synthetic Minor
HUSSMANN SERVICES CORP	IAPLK0001915303823	4360 112TH ST	URBAN DALE	IA	80% Synthetic Minor
HY-VEE PHARMACY FULFILLMENT CENTER 4016	IAPLK0001915303681	4707 FLEUR DR.	DES MOINES	IA	80% Synthetic Minor
HYDRO-KLEAN LLC	IAPLK0001915300323	333 NW 49TH PL	DES MOINES	IA	80% Synthetic Minor
HYKES FURNITURE SERVICES	IAPLK0001915303294	218 SW MAPLE STREET	ANKENY	IA	80% Synthetic Minor
IFBF PROPERTY MANAGEMENT INC	IAPLK0001915302635	5400 UNIVERSITY AVE	WEST DES MOINES	IA	80% Synthetic Minor
INCOTEC INNOVATION CENTER	IAPLK0001915301048	4725 121ST STREET	URBAN DALE	IA	80% Synthetic Minor
INLAND TRUCK PARTS & SERVICE	IAPLK0001915303447	5678 NE 14TH ST	DES MOINES	IA	80% Synthetic Minor
INROADS, LLC	IAPLK0001915302286	1409 NW LAUREL AVE.	ELKHART	IA	80% Synthetic Minor
IOWA AIR GUARD	IAPLK0001915302136	3100 MCKINLEY AVENUE	DES MOINES	IA	80% Synthetic Minor
IOWA ARMY NATIONAL GUARD	IAPLK0001915302137	7105 NW 70TH AVENUE	JOHNSTON	IA	80% Synthetic Minor
IOWA EVENTS CENTER	IAPLK0001915300481	730 3RD ST	DES MOINES	IA	80% Synthetic Minor
IOWA LAW ENFORCEMENT ACADEMY	IAPLK0001915302144	7105 NW 70TH AVE	JOHNSTON	IA	80% Synthetic Minor
IOWA METHODIST MEDICAL CENTER	IAPLK0001915300421	1200 PLEASANT STREET	DES MOINES	IA	80% Synthetic Minor
IOWA NETWORK SERVICES	IAPLK0001915302180	312 8TH ST	DES MOINES	IA	80% Synthetic Minor
ITS INC	IAPLK0001915302146	6700 PIONEER PARKWAY	JOHNSTON	IA	80% Synthetic Minor
J & M COLLISION CENTERS	IAPLK0001915302308	2100 SE GATEWAY DR., STE. 100	GRIMES	IA	80% Synthetic Minor
J & S BODY SHOP	IAPLK0001915303455	2328 HUBBELL	DES MOINES	IA	80% Synthetic Minor
J. PETTICORD, INC.	IAPLK0001915300071	1200 PRAIRIE DRIVE SW	BONDURANT	IA	80% Synthetic Minor
J. PETTICORD, INC.	IAPLK0001915300073	1200 PRAIRIE DR. SW	BONDURANT	IA	80% Synthetic Minor
JACOBSEN AUTO BODY	IAPLK0001915303459	1916 FULLER ROAD	WEST DES MOINES	IA	80% Synthetic Minor
JC TOLAND PAINTING	IAPLK0001915303473	395 NW 43RD PL	DES MOINES	IA	80% Synthetic Minor
JONES LANG LASALLE	IAPLK0001915300778	4741 121ST ST	URBAN DALE	IA	80% Synthetic Minor
KARL CHEVROLET INC	IAPLK0001915303483	1101 SE ORALABOR ROAD	ANKENY	IA	80% Synthetic Minor
KCCI DES MOINES HEARST TELEVISION INC	IAPLK0001915302158	888 9TH ST	DES MOINES	IA	80% Synthetic Minor
KELDERMAN LIME	IAPLK0001915300396	3400 SE GRANGER	DES MOINES	IA	80% Synthetic Minor
KEMIN INDUSTRIES INC	IAPLK0001915300394	2100 MAURY ST	DES MOINES	IA	80% Synthetic Minor
KENT NUTRITION GROUP - ALTOONA	IAPLK0001915300395	203 1ST AVENUE N	ALTOONA	IA	80% Synthetic Minor
KEYSTONE ELECTRICAL MAUFACTURING CO	IAPLK0001915303490	2511 BELL AVE	DES MOINES	IA	80% Synthetic Minor
KNAPP PROPERTIES	IAPLK0001915302921	1776 WEST LAKES PKWY	WEST DES MOINES	IA	80% Synthetic Minor
KRAUSE HOLDINGS, INC.	IAPLK0001915303106	1459 GRAND AVE	DES MOINES	IA	80% Synthetic Minor
L & K HOLDINGS	IAPLK0001915300826	2123 NE 46TH AVE	DES MOINES	IA	80% Synthetic Minor
LACK'S BODY & PAINT CENTER	IAPLK0001915303493	1300 N SHADYVIEW BLVD	PLEASANT HILL	IA	80% Synthetic Minor
LANDUS	IAPLK0001915300225	102 FIRST AVENUE N	ALTOONA	IA	80% Synthetic Minor
LANDUS	IAPLK0001915300230	102 LINCOLN STREET NE	BONDURANT	IA	80% Synthetic Minor

AIRName	SourceID	AIRStreet	AIRCity	AIRState	AIRCmsCategoryDesc
LANDUS COOPERATIVE	IAPLK0001915300158	1700 PLEASANT HILL BLVD	PLEASANT HILL	IA	80% Synthetic Minor
LARSEN'S SOUTHSIDE AUTOBODY	IAPLK0001915303497	2516 GEORGE FLAGG PARKWAY	DES MOINES	IA	80% Synthetic Minor
LEMAR INDUSTRIES CORP	IAPLK0001915303491	2070 NE 60TH AVE	DES MOINES	IA	80% Synthetic Minor
LEYDENS AUTOMOTIVE	IAPLK0001915304747	5211 NE 17TH ST	DES MOINES	IA	80% Synthetic Minor
LISTER INDUSTRIES	IAPLK0001915300404	300 NW 48TH PLACE	DES MOINES	IA	80% Synthetic Minor
LITHIA BODY & PAINT OF DES MOINES	IAPLK0001915303022	9943 HICKMAN RD	URBANDALE	IA	80% Synthetic Minor
LOPEZ AUTO & REPAIR, INC. DBA CENTRAL AUTO & REPAIR, INC	IAPLK0001915302251	125 NE 47TH PL.	DES MOINES	IA	80% Synthetic Minor
MANATTS	IAPLK0001915302199	PORTABLE	BONDURANT	IA	80% Synthetic Minor
MANATTS INC	IAPLK0001915300458	PORTABLE CRUSHER	ANKENY	IA	80% Synthetic Minor
MANATTS INC	IAPLK0001915300372	PORTABLE	ANKENY	IA	80% Synthetic Minor
MARTIN MARIETTA MATERIALS INC	IAPLK0001915303565	1591 NW 54TH AVE	DES MOINES	IA	80% Synthetic Minor
MARZETTI FROZEN PASTA	IAPLK0001915300995	803 8TH ST	ALTOONA	IA	80% Synthetic Minor
MAXIM TRUCKING & MATERIALS	IAPLK0001915303171	1601 FIFIELD DR.	DES MOINES	IA	80% Synthetic Minor
MAXWELL NEEDHAM COLLISION CENTER	IAPLK0001915303609	2440 EASTON BLVD	DES MOINES	IA	80% Synthetic Minor
MCCALLAY MECHANICS, INC	IAPLK0001915302223	5264 NE 14TH ST.	DES MOINES	IA	80% Synthetic Minor
MCCONNELL AUTO BODY INC	IAPLK0001915303509	113 MILL STREET SW	MITCHELLVILLE	IA	80% Synthetic Minor
MCFARLIN BODY SHOP	IAPLK0001915303511	2729 DELAWARE	DES MOINES	IA	80% Synthetic Minor
MDM EQUITY 2010, LLC	IAPLK0001915302147	6109 WILLOWMERE DRIVE	DES MOINES	IA	80% Synthetic Minor
MERCY MEDICAL CENTER	IAPLK0001915301018	1111 6TH AVE	DES MOINES	IA	80% Synthetic Minor
MERCY MEDICAL CENTER WEST LAKES	IAPLK0001915301020	1755 59TH ST	WEST DES MOINES	IA	80% Synthetic Minor
MEREDITH CORPORATION	IAPLK0001915302589	1716 LOCUST ST	DES MOINES	IA	80% Synthetic Minor
MICROSOFT CORP	IAPLK0001915302086	550 WHITE CRANE RD	DES MOINES	IA	80% Synthetic Minor
MID-IOWA SOLID WASTE EQUIP CO INC	IAPLK0001915303570	5105 NW BEAVER DR	JOHNSTON	IA	80% Synthetic Minor
MIDAMERICAN	IAPLK0001915302164	4299 NW URBANDALE DR	URBANDALE	IA	80% Synthetic Minor
MIDAMERICAN	IAPLK0001915302165	3500 104TH ST	URBANDALE	IA	80% Synthetic Minor
MIDAMERICAN	IAPLK0001915300379	3500 104TH ST	URBANDALE	IA	80% Synthetic Minor
MIDAMERICAN	IAPLK0001915302621	2291 STATE ST	DES MOINES	IA	80% Synthetic Minor
MLK RIVERPARK	IAPLK0001915300996	405 SW 5TH ST	DES MOINES	IA	80% Synthetic Minor
MTS IOWA, INC.	IAPLK0001915303546	503 1ST AVENUE NORTH	ALTOONA	IA	80% Synthetic Minor
MURRAY MOTORS	IAPLK0001915303585	2602 NE BROADWAY	DES MOINES	IA	80% Synthetic Minor
NATIONAL CARWASH SOLUTIONS	IAPLK0001915300508	1500 SE 37TH ST	GRIMES	IA	80% Synthetic Minor
NATIONWIDE INSURANCE	IAPLK0001915302031	1200 LOCUST ST	DES MOINES	IA	80% Synthetic Minor
NATIONWIDE INSURANCE	IAPLK0001915302034	204 12TH ST	DES MOINES	IA	80% Synthetic Minor
NATIONWIDE INSURANCE	IAPLK0001915302004	1100 WALNUT ST	DES MOINES	IA	80% Synthetic Minor
NCMIC GROUP INC	IAPLK0001915300440	14001 UNIVERSITY	CLIVE	IA	80% Synthetic Minor
NOAH'S CLEANERS INC	IAPLK0001915303625	6115 SW 9TH ST	DES MOINES	IA	80% Synthetic Minor
NORTH DES MOINES TRUCK AND AUTO BODY LLC	IAPLK0001915303359	5329 NW 2ND ST	DES MOINES	IA	80% Synthetic Minor
NORTH SIDE AUTO BODY	IAPLK0001915303363	4230 NW 2ND ST	DES MOINES	IA	80% Synthetic Minor
NORTHSTAR POWER, LLC	IAPLK0001915302225	7301 SE NORTHSTAR DR.	ANKENY	IA	80% Synthetic Minor
O'HALLORAN INTERNATIONAL	IAPLK0001915303628	3311 ADVENTURELAND	ALTOONA	IA	80% Synthetic Minor
O'MARA AG SERVICES INC	IAPLK0001915303709	1626 DELAWARE AVENUE	DES MOINES	IA	80% Synthetic Minor
OCHO-70	IAPLK0001915303010	25 NW BROADWAY	DES MOINES	IA	80% Synthetic Minor
OLD DOMINION FREIGHT LINE, INC.	IAPLK0001915302305	6925 SE FOURMILE DR.	ANKENY	IA	80% Synthetic Minor
OMG MIDWEST INC	IAPLK0001915302937	5109 NW BEAVER DR.	JOHNSTON	IA	80% Synthetic Minor
ONEOK NORTH SYSTEM LLC	IAPLK0001915300330	4401 VANDALIA ROAD	PLEASANT HILL	IA	80% Synthetic Minor
PAUL'S PAINT & BODY CO INC	IAPLK0001915303637	4328 NE HUBBELL	DES MOINES	IA	80% Synthetic Minor
PERISHABLE DISTRIBUTORS OF IOWA INC	IAPLK0001915302010	2741 SE PDI DR	ANKENY	IA	80% Synthetic Minor
PETERSON CONTRACTORS INC	IAPLK0001915300472	PORTABLE	DES MOINES	IA	80% Synthetic Minor
PETERSON CONTRACTORS INC	IAPLK0001915300447	PORTABLE	DES MOINES	IA	80% Synthetic Minor
PETERSON CONTRACTORS INC.	IAPLK0001915300801	I-80 & HWY 65	ALTOONA	IA	80% Synthetic Minor
PHILLIPS 66 COMPANY	IAPLK0001915302860	4500 VANDALIA RD	PLEASANT HILL	IA	80% Synthetic Minor
PIONEER	IAPLK0001915300482	7000 NW 62ND AVE	JOHNSTON	IA	80% Synthetic Minor
PIONEER	IAPLK0001915303651	6501 NW BEAVER	JOHNSTON	IA	80% Synthetic Minor
PLEASANT HILL AUTO BODY INC	IAPLK0001915303656	5245 E UNIVERSITY	PLEASANT HILL	IA	80% Synthetic Minor
POLK COUNTY GENERAL SERVICES	IAPLK0001915300486	111 COURT AVE	DES MOINES	IA	80% Synthetic Minor
POLK COUNTY GENERAL SERVICES	IAPLK0001915300524	2309 EUCLID AVE	DES MOINES	IA	80% Synthetic Minor
POLK COUNTY GENERAL SERVICES	IAPLK0001915303561	70 COLLEGE	DES MOINES	IA	80% Synthetic Minor
POLK COUNTY SHERIFF'S OFFICE - JAIL	IAPLK0001915300484	1985 NE 51ST PL	DES MOINES	IA	80% Synthetic Minor
PPG INDUSTRIES	IAPLK0001915300371	4525 NE 14TH ST	DES MOINES	IA	80% Synthetic Minor
PRAIRIE MEADOWS RACE TRACK AND CASINO	IAPLK0001915302631	1 PRAIRIE MEADOWS DRIVE	ALTOONA	IA	80% Synthetic Minor
PRECISION BODY & METAL SHAPING	IAPLK0001915303665	225 NE 47TH PL	DES MOINES	IA	80% Synthetic Minor
PRINCIPAL	IAPLK0001915302073	12000 MEREDITH DR	URBANDALE	IA	80% Synthetic Minor
PRINCIPAL LIFE INSURANCE	IAPLK0001915302727	6701 CORPORATE DR	JOHNSTON	IA	80% Synthetic Minor
PYRO GRAPHICS	IAPLK0001915300770	132 S 11TH ST	WEST DES MOINES	IA	80% Synthetic Minor

AIRName	SourceID	AIRStreet	AIRCity	AIRState	AIRCmsCategoryDesc
QUALITY CLEANERS	IAPLK0001915304049	109 8TH ST SW	ALTOONA	IA	80% Synthetic Minor
QUICK STEEL FABRICATION INC	IAPLK0001915303690	5360 MERLE HAY RD	DES MOINES	IA	80% Synthetic Minor
R & R REALTY	IAPLK0001915302184	4700 WESTOWN PARKWAY	WEST DES MOINES	IA	80% Synthetic Minor
R JONES COLLISION SPECIALISTS	IAPLK0001915303686	4416 MERLE HAY ROAD	DES MOINES	IA	80% Synthetic Minor
RAMSEY COLLISION CENTER	IAPLK0001915303700	9625 HICKMAN RD	URBANDALE	IA	80% Synthetic Minor
RCS MILLWORK INC	IAPLK0001915300494	1554 NE 69TH PL	ANKENY	IA	80% Synthetic Minor
REG MARKETING AND LOGISTICS, DBA, KECK ENERGY	IAPLK0001915306001	1434 OHIO ST.	DES MOINES	IA	80% Synthetic Minor
REXCO EQUIPMENT INC	IAPLK0001915303704	5900 SW 56TH ST	DES MOINES	IA	80% Synthetic Minor
RITE WAY	IAPLK0001915303707	718 E BROADWAY	DES MOINES	IA	80% Synthetic Minor
ROLLMASTER, INC	IAPLK0001915303440	2041 E. WALNUT ST.	DES MOINES	IA	80% Synthetic Minor
RUSTER SPORTS, LLC	IAPLK0001915304026	600 SW 7TH ST.	DES MOINES	IA	80% Synthetic Minor
RYAN COMPANIES	IAPLK0001915300321	6400 NW 86TH ST	JOHNSTON	IA	80% Synthetic Minor
SALVADOR BENETEZ BODY SHOP	IAPLK0001915303161	575 NE 48TH PL	DES MOINES	IA	80% Synthetic Minor
SAM'S WEST DBA SAM'S CLUB #6979	IAPLK0001915305166	4615 SE DELAWARE AVE	ANKENY	IA	80% Synthetic Minor
SAMMON'S FINANCIAL GROUP	IAPLK0001915302644	4350 WESTOWN PKWY	WEST DES MOINES	IA	80% Synthetic Minor
SCHLARBAUM AUTO BODY	IAPLK0001915303729	2215 SUNSET RD	DES MOINES	IA	80% Synthetic Minor
SCHMIDT ENT. DBA MAACO PAINT & BODY WORKS	IAPLK0001915303525	1998 NW 92ND CT	CLIVE	IA	80% Synthetic Minor
SCOTTY'S BODY SHOP	IAPLK0001915303744	504 SE 6TH ST.	DES MOINES	IA	80% Synthetic Minor
SCOTTY'S BODY SHOP INC	IAPLK0001915303526	59 UNIVERSITY	DES MOINES	IA	80% Synthetic Minor
SEM INTERPRISES, LLC	IAPLK0001915302451	5304 SE 14TH ST.	DES MOINES	IA	80% Synthetic Minor
SKEFFINGTON'S FORMAL WEAR	IAPLK0001915304760	2453 SW 9TH ST	DES MOINES	IA	80% Synthetic Minor
SMITH'S COLLISION AND PAINT	IAPLK0001915303777	1407 SW ORDANCE ROAD	ANKENY	IA	80% Synthetic Minor
SNYDER CUSTOM AUTO	IAPLK0001915303786	1529 E MADISON	DES MOINES	IA	80% Synthetic Minor
SPECIALTY ENTERPRISES	IAPLK0001915303767	245 NW 52ND AVE	DES MOINES	IA	80% Synthetic Minor
STATE OF IOWA ADMIN SERVICES	IAPLK0001915300810	150 DES MOINES STREET	DES MOINES	IA	80% Synthetic Minor
STATE OF IOWA DAS	IAPLK0001915302235	109 SE 13TH ST	DES MOINES	IA	80% Synthetic Minor
STEW HANSEN DODGE	IAPLK0001915303412	12103 HICKMAN ROAD	URBANDALE	IA	80% Synthetic Minor
STEW HANSEN HYUNDAI COLLISION CENTER	IAPLK0001915303441	2094 114TH ST	CLIVE	IA	80% Synthetic Minor
SUMMIT PRODUCTS	IAPLK0001915303201	6750 NE 41ST AVE	ALTOONA	IA	80% Synthetic Minor
SUPERIOR AUTO SALES LLC	IAPLK0001915303810	835 RAILROAD	WEST DES MOINES	IA	80% Synthetic Minor
SYSCO FOOD SERVICES	IAPLK0001915300921	1 SYSCO PLACE	ANKENY	IA	80% Synthetic Minor
TED'S BODY SHOP INC	IAPLK0001915303826	5571 NW 2ND ST	DES MOINES	IA	80% Synthetic Minor
TILLEY CUSTOM RESTORATION, LLC	IAPLK0001915300211	690 NE 91ST ST	RUNNELLS	IA	80% Synthetic Minor
TONG PLAZA CLEANERS	IAPLK0001915304735	3816 70TH	URBANDALE	IA	80% Synthetic Minor
TONY MORO COLLISION CENTER INC	IAPLK0001915303588	2321 2ND AVE	DES MOINES	IA	80% Synthetic Minor
UNITED CONTRACTORS INC	IAPLK0001915300981	3101 SW BROOKSIDE DR	GRIMES	IA	80% Synthetic Minor
UNITED FLEET TWO	IAPLK0001915303480	1500 NE 56TH ST	PLEASANT HILL	IA	80% Synthetic Minor
UNITY POINT IOWA LUTHERAN HOSPITAL	IAPLK0001915301012	700 E UNIVERSITY AVE	DES MOINES	IA	80% Synthetic Minor
URBANDALE AUTO BODY SERVICE	IAPLK0001915303875	3833 70TH STREET	URBANDALE	IA	80% Synthetic Minor
US POSTAL SERVICE	IAPLK0001915302241	1145 2ND AVE	DES MOINES	IA	80% Synthetic Minor
USCOC OF GREATER IOWA LLC	IAPLK0001915302653	5404 NW 96TH ST	JOHNSTON	IA	80% Synthetic Minor
VA CENTRAL IA HEALTH CARE SYSTEMS	IAPLK0001915301033	3600 30 STREET	DES MOINES	IA	80% Synthetic Minor
VALLEY VIEW VILLAGE	IAPLK0001915301016	2571 GUTHRIE AVENUE	DES MOINES	IA	80% Synthetic Minor
VERIZON BUSINESS	IAPLK0001915302900	4500 A CARLISLE RD	PLEASANT HILL	IA	80% Synthetic Minor
VICTORIA CLEANERS	IAPLK0001915304877	2164 NW 108TH	CLIVE	IA	80% Synthetic Minor
WALDINGER CORP, THE	IAPLK0001915300565	2601 BELL AVENUE	DES MOINES	IA	80% Synthetic Minor
WASTE CONNECTIONS OF IOWA INC	IAPLK0001915303092	4705 NE 22 STREET	DES MOINES	IA	80% Synthetic Minor
WASTE MANAGEMENT OF IOWA	IAPLK0001915300850	201 SE 18TH ST	DES MOINES	IA	80% Synthetic Minor
WATZY'S AUTO SALES, LLC	IAPLK0001915303110	705 SE 14TH ST	DES MOINES	IA	80% Synthetic Minor
WELLMARK BLUE CROSS & BLUE SHIELD	IAPLK0001915302098	1331 GRAND AVE	DES MOINES	IA	80% Synthetic Minor
WELLS FARGO	IAPLK0001915300998	801 WALNUT STREET	DES MOINES	IA	80% Synthetic Minor
WELLS FARGO	IAPLK0001915300982	206 8TH ST	DES MOINES	IA	80% Synthetic Minor
WELLS FARGO	IAPLK0001915302880	800 WALNUT	DES MOINES	IA	80% Synthetic Minor
WELTER AUTO BODY	IAPLK0001915303890	117 MILL STREET	MITCHELLVILLE	IA	80% Synthetic Minor
WES JARNIGAN INC	IAPLK0001915303462	6395 NW BEAVER	JOHNSTON	IA	80% Synthetic Minor
WESLEY ACRES RETIREMENT SERVICES	IAPLK0001915302863	3520 GRAND AVENUE	DES MOINES	IA	80% Synthetic Minor
WEST DES MOINES WATER WORKS	IAPLK0001915300855	1505 RAILROAD AVENUE	IOWA	IA	80% Synthetic Minor
WEST SIDE AUTO BODY INC	IAPLK0001915303893	1838 FULLER ROAD	WEST DES MOINES	IA	80% Synthetic Minor
WILLIS AUTO CAMPUS	IAPLK0001915303154	2121 NW 100TH ST	CLIVE	IA	80% Synthetic Minor
WINDSOR WINDOWS & DOORS	IAPLK0001915300581	900 S 19TH STREET	WEST DES MOINES	IA	80% Synthetic Minor
WRECKAMENDED COLLISION CENTER	IAPLK0001915303911	1500 NE 46TH AVE	DES MOINES	IA	80% Synthetic Minor
ZIEGLER INC	IAPLK0001915302113	1500 ZIEGLER DRIVE	ALTOONA	IA	80% Synthetic Minor

2019 Program Review

Air Quality Division
Linn County Public Health

FINAL REPORT

Program Review Performed by:

Iowa Department of Natural Resources
Air Quality Bureau

January 2020

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Executive Summary

The Iowa Department of Natural Resources (DNR) performed a program review of the Linn County Public Health Air Quality Section (LINN) on October 10, 2019. The review was for the period of July 1, 2018 through June 30, 2019. The DNR used the SFY 2019 28E Contract to evaluate the program.

Executive Summary

Program Management – LINN employs sufficient personnel to perform the services of the Contract and uses a wide variety of training options, including webinars and conference calls, to minimize the cost of obtaining training while also increasing training opportunities for staff.

The SFY 2019 expenditure reports were submitted quarterly using the format provided by DNR. DNR appreciates LINN's rapid responses in addressing questions regarding the submitted expenditure reports. LINN's implementation of improved QA checks of expenditure reports and billable hours documentation has significantly reduced the number of errors in both documents.

As part of the 2019 Contract review, LINN submitted the proposed salary and non-salary programmatic budgets for SFY 2019 with thorough justification. DNR appreciates LINN's timely responses to DNR requests for additional information, including budget scenarios, during the contract development process.

LINN confers with the DNR on the need, content and timing of revisions and updates to air quality ordinances. During the SFY 2020 contract period, LINN will discuss with DNR plans to begin drafting updates to local air quality ordinances.

LINN provided insightful comments and recommendations during a three-day requirements workshop with the consultant for DNR's new electronic air permit application system (EASY Air). LINN's participation during the workshop and in follow-up meetings and emails has been helpful to ensuring that LINN staff will be able to use the system in their review and time tracking for Title V operating permit applications and PSD applications.

Construction Permitting – LINN overall produces well written permits and evaluations and provides outstanding guidance to facilities on NESHAP compliance obligations. DNR identified just a handful of instances of permit procedures used by LINN during this review period that either differed from the latest version of the DNR Construction Permit Manual or current standing EPA guidance as discussed below. LINN does not appear to be providing DNR a copy of all draft permits for NESHAP (National Emission Standards for Hazardous Air Pollutants), NSPS (New Source Performance Standards), or PSD (Prevention of Significant Deterioration) synthetic minor sources as required by the contract and should ensure going forward that DNR is apprised of these project types and given the chance to review or waive review.

Title V – The quality of work performed by the LINN technical staff has been very good and there continues to be consistency between LINN and DNR Title V operating permits. The performance criteria for LINN was to draft for issuance or denial a minimum of four initial or renewal title V operating permits annually. Four permits were issued during this review period. The DNR appreciates participation of LINN in development and testing of the new EASY Air electronic permitting system and participation in the regularly scheduled Title V section meetings.

Compliance and Inspection – LINN runs a very effective compliance program; putting emphasis on all aspects of compliance and has done an excellent job tracking and documenting compliance at facilities, along with effectively returning facilities to compliance when violations are discovered. LINN's response to violations is

timely and appropriate. Inspections are thorough and well documented. Correspondence with facilities is concise and easy to understand.

The SFY 2017 audit identified missing information and corrections needed to the Integrated Compliance Information System (ICIS). The current audit (2019) shows LINN is now meeting all ICIS data entry requirements.

Ambient Air Monitoring – The DNR commends LINN for doing an excellent job running their air monitoring network. Precision and bias statistics for data collected in the most recent complete calendar year were reviewed, and the results were excellent. LINN has also been very responsive to suggestions made in previous audits conducted by the DNR and SHL. Since the last audit, LINN updated the Method Quality Objective tables in their Standard Operating Procedures (SOPs) to reflect the latest (March 2017) version of EPA’s Quality Assurance handbook. Roof repair was completed on the Health Department shelter in the last part of October of 2018. LINN also indicated that it will not be necessary to move this shelter even a short distance after moving their offices to their new (permanent) location in November 2019.

At the end of 2018, LINN’s Quality Assurance (QA) officer retired. In the next contract period (July 2020 to June 2021) LINN is potentially facing two more retirements of staff with long standing experience. The DNR stressed the importance of continuing to make succession plans for the new vacancies. Agreement between LINN’s Federal Equivalent Method (FEM) for PM_{2.5} (particles with a diameter of 2.5 micrometers or less, also known as “fine particles”) monitors versus the Federal Reference Method (FRM) was excellent in 2017, but declined in 2018 and the first eight months of 2019. At the beginning of September 2019, LINN switched one of their continuous PM_{2.5} monitors to a “T640” sampler that utilizes a newer light scattering technology. The DNR indicated that if the new method works out well, eventual replacement of the second continuous PM_{2.5} monitor would leave LINN without a backup T640.

The DNR shared with LINN the results of its correspondence and discussions with EPA about which flow (transfer standard vs. the flow measured by the monitor itself) should be compared to the design flow rate on particulate matter (PM) samplers when the acceptance criteria is +/- 5.1%. LINN agreed to conform their SOPs to EPA’s position on this.

I. Introduction

LINN has been delegated the responsibility of implementing the State of Iowa air pollution control implementation plan within Linn County. To assure that the implementation plan is carried out, the DNR negotiated a 28E Contract with the LINN for the period of July 1, 2018 through June 30, 2019. The purpose of the Contract was to control and prevent air pollution within Linn County. Particular emphasis was placed on the collection and assessment of information regarding air quality, the permitting of sources of air emissions, the enforcement of emission limits and the attainment and maintenance of ambient air quality standards.

The purpose of the program review is to help in the development and improvement of the air pollution program in Linn County by providing guidance, identifying areas where more support is needed from the DNR, and to foster a good working relationship. As a means to verify that LINN fulfilled the terms of the Contract, the DNR staff performed an onsite program review on October 10, 2019. (Preceding the onsite review, DNR conducted a review of electronic files including SFY 2018-2019 reports submitted by LINN, as well as documents requested by DNR.) This review was divided into the following five categories: program management, construction permitting, Title V permitting, compliance and inspection, and ambient air monitoring. The DNR staff performed a comprehensive review of each category. The findings of this review are discussed by category throughout this report.

The program review team consisted of the following DNR staff members (by section):

- Brian Hutchins, Compliance & Ambient Air Monitoring Section Supervisor
- John Gering, Ambient Air Monitoring Unit
- Mark Fields, Compliance Unit
- Julie Duke, Compliance Unit
- Brenda Streicher, Field Office 1 (Manchester)
- Sarah Piziali, Construction Permitting Section Supervisor
- Karen Kuhn, Construction Permitting Section
- Lori Hanson, Operating Permits/Title V Section Supervisor
- Jim McGraw, Program Development Section Supervisor
- Brad Ashton, Program Development Section
- Christine Paulson, Program Development Section (unavailable for the onsite portion of the review)

II. Program Management Provisions

A. Personnel

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: The SFY 2019 Contract (Section 5A.1.1) requires LINN to employ sufficient personnel to perform the services of the Contract during the period of agreement. This section also specifies the knowledge, skills, and abilities required for LINN personnel who perform visible emissions observations, dispersion modeling, facility inspections, ambient monitoring, and permit reviews.

LINN is required to have at least two staff members certified in visible emission observations and at least one staff member trained in conducting dispersion modeling. LINN had two staff members certified in visible emission observations and one staff member trained in conducting air dispersion modeling during SFY 2019. Additionally, LINN is training a second staff member to serve as a back-up modeler.

LINN submitted timely to DNR the quarterly program activity reports for SFY 2019, which included summaries of staff time utilization. LINN maintains an updated list of activity codes with associated descriptions that aid staff in appropriately allotting their time to specific activities. LINN uses queries in Time Tracker to generate the quarterly reports. The table below summarizes staff time utilization based on the information LINN provided in the submitted quarterly reports.

STAFF TIME EXPENDED REPORT SFY 2019

Activity	Budgeted FTEs (Programmatic Budget)	Actual FTEs (Averaged over four quarters)
Administration & Management	0.73	1.48
Construction Permits	2.00	1.34
Minor source	0.95	0.47
Major source (includes PSD)	1.05	0.87
Title V operating permits	0.4	0.16
Ambient Air Monitoring	2.98	2.74
Compliance Inspections	1.70	1.96
Minor source	0.55	0.99
Major source	1.15	0.98
Training/Conferences	0.61	0.50
Program Development	0.5	0.30
Dispersion Modeling	0.15	0.08
Minor source	0.05	0.06
Major source (includes PSD)	0.1	0.02
TOTAL	9.07	8.56

LINN committed to operate the program with a staff level of 8.98 FTE, as specified in the staffing/personnel requirements in Table 1 of the SFY 2019 Contract. Due to rounding inherent in the SFY 2019 Programmatic Budget included in the Contract, however, the total budgeted FTE level is 9.07. The actual staff level for SFY 2019 (averaged over four quarters) was 8.56 FTE.

The lower actual staffing level (0.51 FTE less than budgeted) was due primarily to less than anticipated minor source construction permitting work and Title V operating permit work, as well as slightly less than anticipated program development activities and major source inspections. However, LINN experienced somewhat higher than estimated staff needs for administration and management and minor source compliance inspections. Budget projections are based on the best estimates of expenses without knowing the scope of future permit application submittals and associated review time, as well as unanticipated compliance activities and staffing changes.

During SFY 2019, LINN staff maintained familiarity with applicable air quality permitting, inspection, planning, and monitoring procedures, techniques, and technologies by attending pertinent EPA, DNR, and other public and private training classes, workshops and conferences. The training completed was consistent with the LINN SFY 2019 training plan and relevant to the job duties of each staff member working under the Contract. DNR commends LINN for using a variety of training formats and options, such as taking advantage of classroom courses and utilizing webinars and conference calls, which minimize the cost of obtaining training while also increasing training opportunities for staff. A summary to LINN training that occurred in SFY 2019, based on LINN’s end-of-year report, is included in Attachment C.

B. Fiscal Reporting

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: The SFY 2019 expenditure reports were submitted quarterly using the format provided by DNR. DNR appreciates LINN’s rapid responses in addressing questions regarding the submitted expenditure reports, which facilitated the review and processing of the invoices. LINN’s improved QA checks of each expenditure report before it is submitted has greatly reduced the number of errors previously noted on the expenditure reports. Similarly, differences in the requested billable hours payments and the supporting billable hours

documentation report have been greatly reduced by the improved QA checks.

C. Contract Review

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: LINN timely submitted the proposed salary and non-salary programmatic budgets for SFY 2020 with thorough justification. As part of the budget development process, LINN convened a fee advisory group meeting (as required in Section 5A.3 of the Contract), reviewed the draft budget and calculated estimates of fees that will be received, and received recommendations regarding establishing or adjusting fees.

LINN provided timely responses to the various requests for information – including budget scenarios. LINN met all timelines requested by DNR, and always responded to DNR requests for meetings and additional information.

LINN worked seamlessly with DNR to review and provide comments on the final draft SFY 2020 Contract, as specified in Section 5A.3 of the Contract.

D. Information Technology

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: LINN maintained a website to disseminate information regarding the air program and updated the website as needed during SFY 2019. LINN provided quarterly reports that detailed site usage data such as hourly, weekday and monthly totals for site visits and page views, and breakdowns of this information for the top 10 pages, directories, documents, downloads, images, files and IP addresses. LINN uses this information to identify what types of information are of interest and importance to website visitors, and to decide on future upgrades to the website.

LINN has initiated work with county IT staff to migrate the Air Quality website to the same website platform (CivicPlus) that is currently used by the rest of Linn County government. This switch is expected to occur during SFY2021, and will make it easier and faster for the public to access information on the website while at the same time allowing for improved IT support for the website.

E. Legal Authority

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: LINN regularly confers with the DNR on the need, content and timing of revisions and updates to the Linn County Code of Ordinance (LCCO) on an as needed basis. LINN maintains a “red-line” version of the LCCO, which LINN updates as DNR completes changes to the IAC. This tracking technique allows LINN to capture all applicable updates to the IAC as they are made, decreasing the amount of staff time needed to draft updates to the LCCO.

A county-wide reorganization of the LCCO was completed in 2018. A SIP revision to incorporate the LCCO changes to the air quality ordinance provisions was submitted to EPA in July 2018, and, on November 21, 2019, was published in the Federal Register as a proposal for public comment.

LINN plans to begin drafting updates to the LCCO during calendar year 2020 to adopt applicable provisions from a DNR rulemaking completed in 2019 and another rulemaking anticipated for completion in mid-2020.

F. Minority and Women Business Enterprise (MBE/WBE)

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: LINN provided accurate and timely reports.

G. Intergovernmental Cooperation

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: LINN management staff participated in a Local Program/DNR meeting conducted during SFY 2019. LINN agenda topics for the meeting included the VW Settlement, LINN Solar Group buy, LINN Wood Appliance Change-out funding, and facilitating Citizen Science.

LINN actively participated in a three-day requirements workshop with the consultant for DNR's new electronic air permit application system (EASY Air). The insightful comments and recommendations provided by LINN staff during this workshop and in follow-up meetings and emails has been helpful to ensuring that LINN staff will be able to use the system in their review and time tracking for Title V operating permit applications and PSD applications.

III. Construction Permitting Provisions

A. Construction Permit Activities (Source Review, Permit Issuance, Draft Permit Review, Permit Transfer)

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: See Attachment A for general and specific comments on application review. LINN should ensure DNR is apprised of project types requiring draft DNR review and given the chance to review or waive review as mutually agreed.

B. Permit/Modeling Procedures

Acceptable Corrective Action Needed Deficient Not evaluated

Permit Comments: LINN is excellent at reviewing and noting all applicable NESHAP in their issued permits. Additionally, the peer review process is continuing to catch most errors prior to permit issuance and the engineering evaluations are well written and explanatory. DNR finds that LINN could improve consistency in a few areas:

1. When setting plant-wide synthetic minor limits, even for minor sources, LINN should still require recordkeeping to make the limits enforceable as a practical matter. If LINN believes that the source is actually a true minor, the DNR suggests setting specific Hazardous Air Pollutant (HAP) limits for each unit, and then documenting that the plant remains a minor source in the evaluation.
2. If setting a plant-wide limit in tons per year and requiring a daily recordkeeping trigger above 80% of the limit, LINN should provide justification for the higher trigger in the evaluation. DNR practice and guidance is to set the trigger at 80% unless otherwise justified.
3. If a company is currently not subject to a NESHAP because it is not using a target HAP, but may in the future, the DNR suggests that LINN note the company is not subject to the NESHAP unless it is using the target HAP. It is less confusing than forbidding the use of a target HAP, then allowing it if the company follows the NESHAP requirements.
4. If LINN is basing synthetic minor or modeling decisions on grain/dry standard cubic foot (gr/dscf) limits and the PTE is close to the threshold, the DNR suggests LINN establish a pound/hour (lb/hr) limit in addition to the gr/dscf limit. Airflows are allowed to vary by +/- 25% without requiring a permit modification which could cause unintended issues with a synthetic minor limit or result in a different modeling determination.

See Attachment A for other general and specific comments.

Dispersion Modeling Comments: LINN staff is very knowledgeable about modeling procedures and has performed a significant number of analyses which helps maintain their skill. LINN shows a good understanding

of the more complex aspects of modeling, including ambient air, intermittent sources, operating factors, and downwash. LINN leverages tools to make modeling analyses more accurate and consistent. LINN consistently performs a thorough review when modeling analyses are submitted by the applicant.

Concerns regarding the implementation of DNR modeling guidance for specific projects are summarized in Attachment A. Two issues were noted that affect the modeling analyses in general:

1. The secondary formation of PM_{2.5} (particulate matter that have a diameter of less than 2.5 micrometers) and Ozone needs to be considered in projects with NO₂ (Nitrogen Dioxide), SO₂ (Sulfur Dioxide), or VOC (Volatile Organic Compound) emissions. If emissions are less than the applicable Significant Emission Rates (SERs), a simple statement explaining this fact is sufficient. For projects with higher levels of emissions, EPA's Modeled Emission Rates for Precursors (MERPs) can be used.
2. The DNR has concluded that emissions from neighboring sources will generally cause a significant concentration gradient in their vicinity, and are therefore generally not adequately represented by the background concentration. Groups of contiguous facilities should generally be modeled together.

C. PSD Permit Activities

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: See Attachment A for general and specific comments.

D. PSD Pre-application (Pre-application Meeting, Review of Pre-application Materials)

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: No comments.

E. PSD Permit Application Review (Application Processing, Decision to Deny a Permit Application)

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: See Attachment A for general and specific comments.

F. PSD Permit Drafting Procedures (Permit Content, Fact Sheet, PSD Permit Review by DNR, Facility Review of PSD Permit)

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: See comment on permit procedures above and attachment A for general and specific comments.

G. Public Notice Intent to Issue (PSD Permit Review by EPA, Public Notice and Public Participation, Publication and Availability of Notice, Public Comment Period, Public Hearing, Response to Comments)

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: No comments.

H. Final PSD Permit Issuance (Changes to Draft Permit, Conveyance of Proposed Final Permit to DNR, Re-notification of Permit, Conveyance of Final Permit)

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: No comments.

I. PSD Permit Modifications

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: See Attachment A for general and specific comments.

J. Reporting Requirements

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: No comments.

K. DNR Responsibilities

Acceptable Corrective Action Needed Deficient Not evaluated

Comments:

IV. Title V Permitting Provisions

A. Title V Permit Activities

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: The performance criteria for LINN was to draft for issuance or denial a minimum of four initial or renewal Title V Operating Permits annually. During this review period, four permits were issued: IPL Prairie Creek Generating Station, Cedar Rapids WPCF, Cargill Inc., and GM Cereal Properties Inc. A proposed schedule identifying the Title V permits LINN intended to issue was submitted timely.

B. Application Review

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: Completeness reviews were conducted by LINN in a timely manner to ensure that the applications were not deemed complete by default.

C. Permit Drafting Procedures

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: LINN completes the technical reviews and prepares draft permits according to 567 IAC 22.108 and generally follows the DNR Title V Review Manual, Title V Permit Review Check Sheet and Completeness Review Checklist. There continues to be appropriate coordination and consistency between the two programs.

D. Public Notice Intent to Issue

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: LINN is following the new electronic notification process, and at a minimum, posts a notice on a publically available website.

E. Final Permit Issuance

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: No comments.

F. Permit Renewals

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: LINN drafts renewal permits using the same procedures that apply to initial issuance.

G. Reopening Issued Title V Permits

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: No permits were re-opened during this period.

H. Permit Changes

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: No comments.

I. Reporting Requirements

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: LINN submitted quarterly status reports with the required information on active Title V permit applications.

V. Compliance and Inspection Provisions

File Review Procedures

The DNR AQB Compliance Unit staff reviewed ten (10) LINN files. The ten files reviewed were a sufficient number to sample the LINN enforcement and compliance program. DNR chose to review file documentation for [4th Quarter 2017 -2019]. The files that were reviewed were as follows:

Major Sources:

Bio Springer	57-01-226
Diamond V Mills - North	57-01-045
Cedar Rapids WPCF	57-01-077
General Mills-GM Cereal Properties	57-01-012
International Paper	57-01-153
IPL Prairie Creek Generating Station	57-01-042

Minor Sources

JRS Pharma LP-MCCII	57-01-150
Frey Pet Hospital	57-01-165
ReConserve of Iowa	57-01-245
J. Rettenmaier USA LP	57-01-224

Prior to the onsite audit, DNR staff requested and reviewed the files sent electronically to the DNR. On the day of the audit, DNR staff conferred with LINN staff regarding the inspection reports, specific enforcement actions at some facilities, stack testing, and the ICIS Database.

A. Compliance

Acceptable Corrective Action Needed Deficient Not evaluated

Comments:

It is evident from the file review and discussions with LINN staff that LINN runs a very effective compliance program. LINN staff do an excellent job tracking, evaluating, and documenting compliance at facilities within Linn County and takes appropriate and timely action to address air quality violations. The compliance correspondence with facilities is concise, easy to understand, and includes follow up dates when needed.

The electronic files were well organized and contained the inspection reports, Notices of Violation (NOVs), excess emission reports, NESHAP reports, stack tests, and other correspondence.

LINN is providing a copy of all Letters of Noncompliance (LNC) and NOV to the DNR compliance section. LINN is also providing the required Compliance and ICIS reports to DNR on a quarterly basis.

LINN adequately meets the compliance provisions agreed upon in the Contract.

B. Stack Tests

Acceptable Corrective Action Needed Deficient Not evaluated

Comments:

LINN conducts a review of all stack test reports submitted and generates a summary sheet. LINN also sends the facility a compliance letter at the conclusion of reviewing the report. DNR reviewed some of the LINN stack test reports as part of this audit and found LINN stack test reviews to be accurate and complete. LINN staff are very knowledgeable of the federal stack test reference methods and application to different types of sources. LINN’s stack test review process is also well documented. DNR suggested LINN require the use of Methods 18 or 320 to the extent possible for VOC testing as this is the preferred method to best characterize total VOC emissions.

LINN and DNR completed a joint stack test observation and evaluation at a Cargill facility in LINN in 2019. LINN staff are very competent and followed similar procedures to DNR while onsite.

C. Inspections

Acceptable Corrective Action Needed Deficient Not evaluated

Comments:

The LINN inspection reports were very thorough and included a determination of compliance status and recorded observations. In addition, any needed corrective action was also identified. The use of the Title V Permit and Construction Permits as the template for the inspection makes it easy to verify applicable requirements and document compliance.

LINN submits its Compliance Monitoring Strategy (CMS) plan to DNR each year. LINN is conducting inspections in accordance with the schedule included in the CMS.

Joint inspections were evaluated by DNR Field Office 1 and no issues were identified.

D. Variances

Acceptable Corrective Action Needed Deficient Not evaluated

Comments: N/A

E. Data Management

Acceptable Corrective Action Needed Deficient Not evaluated

Comments:

Compliance and enforcement information for federally reportable sources must be entered in EPA’s ICIS database. LINN implemented a data entry plan for ICIS following issues identified by DNR in the 2017 audit. DNR’s review of ICIS for the 2019 audit showed all facility information was accurate and complete. It was apparent from discussions with LINN staff that they are following their data entry manual and are very knowledgeable of the ICIS system and data requirements.

DNR recommended LINN participate in the annual EPA ICIS data verification process to ensure the accuracy of EPA reported data and metrics.

F. Emissions Data

Acceptable Corrective Action Needed Deficient Not evaluated

Comments:

LINN requires and observes stack testing at facilities within LINN. LINN requires the use of federal test methods for compliance demonstrations. LINN is also reporting stack test results to EPA through the ICIS database.

VI: Ambient Air Monitoring Provisions

Commendation:

LINN does an excellent job running their monitoring network. For data collected in 2017 and 2018, all LINN criteria pollutant monitors were recommended for certification by EPA. This certification is based on having both good data quality and completeness. Precision and bias statistics for data collected in the most recent complete calendar year were reviewed, and LINN met the associated goals. In the fall of 2018 EPA conducted through the probe audits on LINN's gas analyzers at the Health Department. This involved CO (Carbon Monoxide), SO₂, and ozone. Audit results in the Air Quality System (AQS) database show that LINN passed at all levels. In spite of their small staff and the retirement of their QA officer at the end of 2018, LINN has continued to collect high quality data.

In April of 2018 the first small citizen science ("Purple Air") monitors started in the LINN network. A major repair was done on the roof of the Health Department shelter in the last half of October 2018 with minimal data loss. Since the last DNR audit of LINN, the Method Quality Objective tables in the LINN SOPs have been updated to reflect EPA's latest (March 2017) version.

A. Finding/Recommendation #1:

Finding: The ambient monitoring section of LINN is potentially facing two retirements (Jeff Lake and Kyle Lundberg) in the next contract period (July 2020 to June 2021). In light of the small size of their staff and the extensive experience of these two individuals, their possible retirement will pose a major challenge for the monitoring program. LINN mentioned that their QA officer (Riley Mullins), whose time is currently split between the air and water program, might transition to full time air monitoring work.

Recommendation: The DNR encourages LINN to continue to develop succession plans.

B. Finding/Recommendation #2:

Finding: The March 2017 revision of the Redbook Validation Templates, elevated the importance of results from one of the three flow rate verifications done during monthly checks on PM_{2.5} samplers and low volume samplers for PM₁₀ (particles with a diameter of 10 micrometers or less). This refers to the flow check where the sampler is in normal sampling configuration, the Flow Transfer Standard (FTS) is off, and the flow measured by the sampler has to be within 2.1% of the 16.7 liters per minute (lpm) design flow rate. EPA raised the status of this check from an Operational Criteria to a Critical Criteria. The DNR noted that section 3.11.1.5 of the LINN SOP for collecting PM_{2.5} and PM₁₀ on the Thermo 2025 sampler does not reflect this update.

Recommendation: LINN should revise this section of their SOP for discrete PM accordingly.

C. Finding/Recommendation #3:

Finding: In the fall of 2018, EPA conducted "through the probe" audits on gas analyzers at the Health Department site (for CO, SO₂, and ozone). Based on values already in AQS, all analyzers passed at all levels.

Recommendation: The DNR would appreciate if LINN would forward the final results when they receive them from EPA.

D. Finding/Recommendation #4:

Finding: In November 2018, EPA conducted a technical systems audit of the LINN air monitoring program. A draft preliminary report of the audit findings involved:

1. EPA recommends that the design flow rate calculation be included on the PM₁₀ Flow Audit form.
2. EPA recommends that the expiration date of the Standards used be included in the Met Station Quarterly Audit form.

3. EPA recommends that the expiration date of the calibrator and cylinder used be included in the SO₂ Calibration form.
4. EPA recommends that the criteria used on the Calibrator Flow Verification shall be changed to 2% from 4%. (Reference: Quality Assurance Handbook for Air Pollution Measurements Systems, Volume II: Ambient Air Quality Monitoring Program, EPA-454/B-13-003, May 2013).

Item 1 may be related to the question of whether the flow from the portable transfer standard, or the sampler's own flow meter, should be compared to the design flow rate. (See a detailed discussion of this in Finding H.) The Met Station Quarterly Audit form includes lines to enter the serial numbers of the audit standards, but does not include a line for the expiration date of such standards. For the calibration of gas analyzers, LINN uses some spreadsheets that were generated by EPA that are "password protected" and cannot be edited by the states. LINN indicated that some of these spreadsheets do not include a field for expiration dates. LINN also indicated that the expiration dates for calibration standards are recorded in the site logbook during calibrations, checks, audits. The 4th item pertains to the quarterly flow verifications for the Mass Flow Controllers (MFCs) on the Thermo 146 gas dilution calibrator. LINN already addressed this, since the acceptance criteria for this check was changed from 4% (March 2018 SOP) to 2% (March 2019 SOP). At lower flows the 2% acceptance criteria is only slightly more lenient than the accuracy specification of the instrument. LINN reported that although adoption of the tighter criteria occasionally resulted in more frequent calibrations of the MFCs, it has not been too much of a burden so far.

Recommendation: The DNR would appreciate if LINN would forward the final results of this audit when they receive them from EPA. The DNR recommends that LINN collaborate with the DNR and EPA to address any ambiguities concerning the revision of Field Data Sheets (FDS) that are not resolved in the final report. The DNR recommends that LINN add fields for the expiration dates of the calibration standards to the FDS that are referenced in the audit, to the extent that EPA generated spreadsheets are editable. The DNR also recommends that LINN add fields for the expiration dates of the calibration standards to their own internally generated FDS that are referenced in the audit.

E. Finding/Recommendation #5:

Finding: The State Hygienic Lab (SHL) conducts an annual technical systems audit of LINN air monitoring activities. No remedial actions were required as a result of the audit covering calendar year 2017, but one suggestion was noted. SHL suggested that LINN ensure transfer checks of the data acquisition system are done at least annually. LINN indicated that they had historically done this, but omitted the cross check in 2017. LINN put reminders on their calendar, and showed the results of the check done in 2018, to SHL auditors at the following SHL audit.

Recommendation: The DNR encourages LINN to continue its present practice.

F. Finding/Recommendation #6:

Finding: SHL conducts an annual technical systems audit of LINN air monitoring activities. No remedial actions were required as a result of the audit covering calendar year 2018, but two suggestions were noted. In recent years, Iowa has reported both the hourly average SO₂ value and the largest 5-minute SO₂ average for each hour. SHL suggested that LINN initiate plans to track the hourly maximum 5-minute averages that are less than the full hourly average on a quarterly basis. LINN has already addressed the first suggestion by creating a tracking spreadsheet. The second suggestion involved editing section 6.1 of the Quality Management Plan (QMP) for clarity, and updating the QMP to reflect the fact that Quality Improvement (QI) Analyst software has been replaced by Envista. LINN indicated their agency will be doing these updates at the time of their next routine QMP review/update.

Recommendation: The DNR encourages LINN to make this revision in the QMP they submit as part of the Annual Review in March of 2020.

G. Finding/Recommendation #7:

Finding: In May 2019 LINN received a Thermo 146iQ Gas Dilution Calibrator with three MFCs. The gas dilution calibrators that LINN has historically operated used only 2 MFC, one for the zero air and another connected to the pollutant stock cylinder. The new 146iQ model has 2 pollutant MFCs that allow for a much broader dilution range. In the course of reviewing this SOP, the DNR also noted some issues with two of the associated FDS. On the “Flow Verification/Audit” form, the last column shows a value of 2.50% as passing. Also, in the “Zero Air” tier of rows, flow should be entered from highest to lowest, so only the lowest (below 20% of the full scale range) is not subject to the test criteria. (In the image of the FDS attached to the SOP, it’s the highest flow that’s not subject to the acceptance criteria.) The same inversion appears in the “Zero Air” tier of the form for verifications that immediately follow a calibration.

Recommendation: LINN will need to make some modifications to their SOP for gas dilution calibrators to make it applicable to the new instrument. (Since the 146iQ with three MFC is not currently deployed, LINN plans to defer the SOP updates arising from the new instrument until after training. Plans are to have the training occur after the move to the new building.)

H. Finding/Recommendation #8:

Finding: About 2 months after the last audit, the DNR had a conference call with Region 7 regarding some ambiguity in EPA guidance for operating PM_{2.5} FRM samplers. One of the criteria for monthly verifications and quarterly audits was that something should be within 5% of the 16.7 lpm design flow rate of the size separator on the sampler. There are two possible flows that could be compared to the design flow rate. One would be the flow measured by the sampler’s own flow meter. The other would be the flow measured by a portable NIST traceable FTS that the operator or auditor attaches the sampler. After considerable discussion EPA decided in favor of the latter. In other words, the flow measured by the portable FTS should be within 5% of 16.7 lpm. The scope of the DNR’s discussions on this issue was initially limited to monthly flow verifications and quarterly audits for PM_{2.5} FRM samplers. However, the March 2017 Redbook uses identical criteria for flow rate verifications and audits for PM_{2.5} FRM samplers, continuous PM_{2.5} samplers, and low volume filter based PM₁₀ samplers. Therefore, the DNR concluded that EPA’s verdict applies to flow checks and audits for all the pollutant/method combinations just mentioned. The DNR conveyed these developments to LINN at the time of the audit, and also noted that EPA committed to work towards removing ambiguity on this in both the Redbook and Guidance Document 2.12.

Recommendation: The LINN SOPs for their BAM 1020 and Teledyne T640 continuous PM_{2.5} samplers appear to be already in line with EPA’s position. LINN has a combined SOP for both discrete PM_{2.5} and PM₁₀ sampling (since they are collected on the same instrument with different size separators). That SOP requires some minor modifications to conform to EPA’s position, particularly in section 3.11.1.5. LINN should revise the latter SOP accordingly.

I. Finding/Recommendation #9:

Finding: Starting at the very end of 2016, LINN configured their continuous BAM 1020 PM_{2.5} samplers as FEM instruments. For data collected in 2017 agreement between these samplers and the discrete Federal Reference Method (FRM) samplers was excellent. (Both BAMs were in the “Hanley Box” for 2017.) The agreement between the two methods deteriorated for data collected in 2018, as well as for the first eight months of 2019, and neither BAM met the “Hanley Box” equivalence criteria for these time frames. The POC 3 BAM sampler was replaced with a T640 analyzer on 9/1/2019. The measurement principle of a T640 is based on the scattering of polychromatic light, and samplers of this type have not been previously used in Linn County. LINN set flags in EPA’s AQS database that will exclude both BAMs from contributing to determinations about National Ambient Air Quality Standards (NAAQS) attainment, starting on 1/1/2018 and going out to the indefinite future. This was indicated in the DNR’s 2019 Network Plan. A few days after the audit (on 10/18/19) the DNR was informed that EPA approved the Network Plan, which indicates their concurrence with the exclusion flags.

Recommendation: LINN should continue to track the performance of their continuous PM_{2.5} samplers relative to the FRM. If the T640 demonstrates good agreement with the FRM, it may be advisable to replace the POC 4 BAM with a T640 as well, perhaps between 7/1/2020 and 1/1/2021.

J. Finding/Recommendation #10:

Finding: DNR and LINN discussed equipment needs. LINN is in the process of purchasing a Thermo 2025i sampler, as indicated in the final equipment list for the FY2020 contract. LINN currently has a total of two T640 analyzers. If the POC 4 BAM was replaced by a T640, LINN would not have a backup T640. LINN also indicated that some of their flow transfer standards are getting old and malfunction occasionally. LINN thought that a 3D printer might be required to configure inlets for the heated Purple Air samplers they are developing.

Recommendation: LINN should continue to monitor the age and condition of the equipment in their network, and availability of backup parts and equipment. The DNR and LINN will continue to work together to ensure sufficient funding is available for these purchases. LINN should explore the possibility of working work with Polk County or SHL, to get a 3D printout of an inlet blueprint that LINN drafted.

K. Finding/Recommendation #11:

Finding: LINN performs daily-automated checks at three levels: 1) “0 level” using pollutant free air, 2) mid-range (the precision level) and 3) high concentration (the span level). EPA currently only requires the precision level results be uploaded to the AQS database. However, EPA has already developed slots for results from the zero and span level, and it is anticipated that EPA will require all three levels to be uploaded in the future

Recommendation:

LINN should plan for eventually being asked to do this.

L. Finding/Recommendation #12:

Finding: DNR and LINN discussed LINN’s 2018 precision and bias statistics (please see Attachment B). EPA goals were not only met, but the LINN network generally passes the goal by a wide margin.

Recommendation: The DNR encourages LINN to continue its present practice.

Attachment A: Comments on Specific Linn County Construction Permits

The purpose of the construction permit evaluation was to determine if the program is being conducted in a manner consistent with the Contract. The investigation looked specifically at the following permit actions, which were intended to be representative.

ADM

- project 15-215, LCPH 2173,
- project 2337, ATI 6974 to 6976 –
- project 2508, ATI 7167, 7168
- project 18-374, 07-A-543-P4, 07-A-544-P4
- project 4545, ATI 7120
- project 18-477, 07-A-541-P2
- project 4568, ATI 7225

Betenbender Manufacturing,

- project 2503, ATI 7202 thru 7204, 7215

Cargill Corn Milling

- project 3541, ATI 7212, 7213
- project 2526, ATI 7196
- project 2505, ATI 7124.
- project 2480, ATI 7111
- project 2423, ATI 7064, 7065

Cargill East Bean

- Project 2472, ATI 7099

Cargill West Bean

- project 4577, ATI 7242
- project 2478, ATI 7108

Corn Fed Automotive

- project 4553, ATI 7220

Croell

- project 2487, ATI 7115, 7116

Danisco

- project 4613, ATI 7260
- project 2519, ATI 7187 thru 7193
- project 2517, ATI 7187 to 7189
- project 2466, ATI 7098
- project 2439, ATI 5133, 5116, 5329, 5572, 5573
- project 2429, ATI 5328
- project 2410, ATI 4947
- project 2375, ATI 7020

Diamond V North

- project 4599, ATI 7255

Diamond V South

project 2367, ATI 6783, 6784 .
project 4615, ATI 7262
project 4580, ATI 7244
project 4559, ATI 7230 thru 7239
project 2468, ATI 7100

Diamond V South

project 2463, ATI 7092

Electro-Coatings of Iowa

project 2452, ATI 7084.
project 2473, ATI 6225.

General Mills

project 2414, ATI 7060, 7061
project 2426, ATI 7066
project 2438, ATI 7076
project 2510, ATI 7169
project 4547, ATI 7228
project 4576, ATI 7240, 7241 –
project 4598, ATI 7254

Ingredion Inc.

project 4583, ATI 7245 and 7246.
project 4614, ATI 7261

International Paper,

project 4551, ATI 7126, 7127, 7218.
project 3533, ATI 7107, 7127, 7208

PMX Industries

project 2475, ATI 7105, 7106. .

Red Star Yeast

project 2194, ATIs 6822-6936.
project 2304, ATI 6927 thru 6929
project 2313, ATI 6935.
project 2485, ATI 7113, 6822

RELCO Locomotive,

project 4596, PTO 5388-R1
project 4617, PTO 7267 –

Rockwell Collins

project 4586, ATI 7272,
project 4586, ATI 7247.
project 2448, ATI 7082.

The following general issues were noted:

- 1) Plant-wide synthetic minor limits, even for minor sources, still require recordkeeping to make the limits enforceable as a practical matter. If LINN believes that the source is actually a true minor, the DNR suggests setting specific HAP limits for each unit, and then documenting that the plant remains a minor source in the evaluation.
- 2) If setting a plant-wide limit in tons per year, the DNR notes that setting anything above 80% of the limit as the trigger point to switch to daily recordkeeping needs to be justified in the evaluation.
- 3) If a company is currently not subject to a NESHAP because it is not using a target HAP, but may in the future, the DNR suggests noting that the company is not subject to the NESHAP unless it is using the target HAP. It is less confusing than forbidding the use of a target HAP, then allowing it if the company follows the NESHAP.
- 4) When basing synthetic minor or modeling decisions on the potential-to-emit (PTE) based on grain/dry standard cubic foot (gr/dscf) limits, the DNR notes that airflows can vary by +/- 25% without requiring a permit modification. If the PTE is close to the threshold, the DNR suggests using a pound/hour (lb/hr) limit to clarify matters.

General Modeling Comments

Two issues were noted that affect the modeling analyses in general:

1. The secondary formation of PM_{2.5} and Ozone needs to be considered in projects with NO₂, SO₂, or VOC emissions. If emissions are less than the applicable Significant Emission Rates (SERs) a simple statement explaining this fact is sufficient. For projects with higher levels of emissions EPA's Modeled Emission Rates for Precursors (MERPs) can be used.
2. The DNR has concluded that emissions from neighboring sources will generally cause a significant concentration gradient in their vicinity, and are therefore generally not adequately represented by the background concentration. Groups of contiguous facilities should generally be modeled together.

The following are permit specific issues:

Facility Name:

Cargill Corn Processing – Project 2505, ATI 7124. The DNR notes that monitoring frequency is a factor in setting operating parameters, as continuous monitoring might require a larger allowable range in the measured parameter to account for all operating conditions, while a once a week recording may be better off with an allowable range for normal operating conditions.

Danisco – As noted above in the general issues section, a plant-wide synthetic minor HAP limit of 9.4/243.4 tpy requires recordkeeping to make it practically enforceable.

Electro-Coatings of Iowa – Project 2473, ATI 6225. The evaluation of this project noted “DNR does not identify HCl (hydrochloric acid) as a VOC or PM HAP.” The DNR does consider HCl a PM HAP.

Electro-Coatings of Iowa – Project 2452, ATI 7084. Condition 5.E states “The emission of any of the following plating and polishing metal HAPs through this emission point (EP004) as defined in 40 CFR 63.11511, are prohibited: cadmium (Cd), chromium (Cr), lead (Pb), manganese (Mn) and nickel (Ni). Or, as an alternative, the owner or operator can elect to comply with the requirements on NESHAP Subpart WWWW by meeting the applicable Standards of Compliance requirements...” The DNR suggests that it would be clearer if HAPs are allowed if the condition stated that the owner or operator must follow the applicable requirements of WWWW if they use of any of the HAPs (list) in this emission unit.

Ingredion Inc – Project 4583, ATI 7245 and 7246. There is emission limit table for “Alternative Operating Scenario”, but the permit did not define when the alternative operating scenario was allowed.

RELCO Locomotive – Project 4617, PTO 7267. When this booth was relocated, it looks like the lb/hr limit was removed. It appears that the lb/hr limit was originally based on modeling guidance, and the reviewer decided that no PM10 or PM2.5 limits were necessary since the particulate PTE based on the gr/dscf limit and airflow was below PSD significant thresholds. The DNR would note that if the airflow was nearer 125% of the permitted rate, the PTE would be over 10 tons per year.

Rockwell Collins – Project 2448, ATI 7082. The VOC and HAP limit recordkeeping seem to be inconsistent, in that the VOC plantwide limit does not include VOC emissions from combustion and storage tanks, but the HAP limits are facility wide and do apparently include emissions from combustion and storage tanks.

Specific Modeling Comments

ADM #4567 – When reevaluating PSD permits, it is generally necessary to reevaluate all components of the air quality analysis. For this project the NAAQS analysis was reevaluated but the Increment was not. Also, the additional impact analysis was not reevaluated. Oftentimes, small changes to the permits will still allow the same additional impact analysis to be used, but it should still be replicated in the project so that the analysis record is complete. The Increment analysis should have been reevaluated, but based on the changes being made, and based on the results of the NAAQS analysis that was completed, the conclusion of the analysis would not have changed in this case.

Attachment B. Summary of LINN Precision and Bias*

*Results from DNR's SLAMS certification review for 2018

PM_{2.5} FRM routine co-located pairs:

Goal for CV < 10.1%.

LINN 19-113-0040
4.30%

PM_{2.5} FRM PEP concentration pairs:

Is the "Bias" < 10.1%?

LINN 19-113-0040
3.41%

PM_{2.5} FRM PEP concentration pairs: Is the absolute value of both LCL and UCL for "Bias" < 10.1%?

LINN 19-113-0040
-6.50% to 13.31%

PM₁₀ routine co-located pairs:

Goal for CV < 10.1%.

LINN 19-113-0040
5.68

PM_{coarse} routine co-located pairs:

Goal for CV < 15.1%

LINN 19-113-0040
8.70%

Audit limits should fall into confidence limits obtained from routine checks. As a goal, ninety-five percent of the individual percent differences (all audit concentration levels, from all monitors) should be captured within the probability intervals for the same primary quality assurance organization (from bi-weekly checks done on all monitors). Yellow highlight indicates values <75%. (Note that this statistic does not account for the uncertainty in the known value of the audit gas, and the uncertainty in the known value of the routine calibration gas. Also, small and consistent percent differences during bi-weekly checks narrow the confidence limits making it more difficult to attain the goal. EPA dropped this assessment in their April 2016 revisions to 40 CFR Part 58.)

Pollutant	LINN
CO	92%
Ozone	94%
SO ₂	11%
PM _{2.5} (FRM & BAM)	88%
PM ₁₀ Discrete	88%

For bias, the sign should be neutral (+/-) instead of positive (+) or negative (-). The magnitude of the bias for pollutants other than ozone and NO₂ should be less than 10.1%. For NO₂ the magnitude of the bias should be less than 15.1%, and for ozone it should be less than 7.1%. The bias results for the LINN reporting organization are presented in the table below:

Pollutant	Sign of Bias	Magnitude of Bias
CO:	+/-	2.78%
Ozone:	+/-	1.33%
SO ₂ :	+/-	1.19%
PM _{2.5} FRM & BAM:	+/-	0.86%
PM ₁₀ Discrete:	-	1.48%
PM Coarse:	+/-	8.93%

Almost all the bias signs were neutral. In addition, the magnitude of the bias always met the associated goal.

Attachment C. Staff Training Summary

Title	Employee(s) Attending	Training Delivery	First Date(s) of Training
EPA Low Cost Air Sensors Webinar	Burns, Dave	Computer/Electronic Based: webinars, on-line, phone	4/17/2019
Retigo Tutorial Webinar	Burns, Dave	Computer/Electronic Based: webinars, on-line, phone	4/16/2019
NACAA Air Sensors Conference Call	Burns, Dave	Computer/Electronic Based: webinars, on-line, phone	3/11/2019
NACAA Monitoring Conference call	Burns, Dave and Mullins, Riley	Computer/Electronic Based: webinars, on-line, phone	11/1/2018
AQS Ask The Experts	Burns, Dave	Computer/Electronic Based: webinars, on-line, phone	11/1/2018
Air pollution exposure and health risk	Burns, Dave and Dodge, Shane	Computer/Electronic Based: webinars, on-line, phone	9/28/2018
Thermo Air Monitor Training Summit	Burns, Dave; Lake, Jeff; Mullins, Riley; and Otto, Jon	Conference/Meeting/Training: Physically attend	9/18/2018
Air Toxics 2014 NATA Data preview	Burns, Dave and Daugherty, Anthony	Computer/Electronic Based: webinars, on-line, phone	8/20/2018
EPA National Ambient Air Monitoring Conference	Burns, Dave	Conference/Meeting/Training: Physically attend	8/13/2018
Air Sensors Webinar	Burns, Dave; Lundberg, Kyle; and Mullins, Riley	Computer/Electronic Based: webinars, on-line, phone	8/2/2018
NACAA Criteria Pollutants Call	Daugherty, Anthony	Computer/Electronic Based: webinars, on-line, phone	6/26/2019 and 9/13/18
DNR Construction Permit Meeting Call	Daugherty, Anthony; Dodge, Shane; and Drahos, Amy	Computer/Electronic Based: webinars, on-line, phone	2019: 6/25, 5/14, 4/2, 3/5, 2/4 and 1/8. 2018: 12/11, 11/13, 10/30, 8/21, 8/7 and 7/24.
NACAA Permitting Success Stories	Daugherty, Anthony	Computer/Electronic Based: webinars, on-line, phone	6/24/2019
NACAA Permitting & NSR Call	Daugherty, Anthony	Computer/Electronic Based: webinars, on-line, phone	2019: 6/11, 5/8, 3/13, 2/13. 2018: 11/14, 9/12, and 7/11
NACAA Emission & Modeling Call	Daugherty, Anthony	Computer/Electronic Based: webinars, on-line, phone	2019: 6/4 and 4/2. 2018: 12/4, 10/2, and 8/7.
Air Quality Client Contact Meeting	Daugherty, Anthony	Computer/Electronic Based: webinars, on-line, phone	5/23/2019
NACAA Permitting & NSR Call	Daugherty, Anthony	Computer/Electronic Based: webinars, on-line, phone	5/8/2019
Power Sector's Planning Process/Agency Participation	Daugherty, Anthony and Drahos, Amy	Computer/Electronic Based: webinars, on-line, phone	4/4/2019
NACAA: Air Quality Regulations	Daugherty, Anthony	Computer/Electronic Based: webinars, on-line, phone	3/26/2019

Title	Employee(s) Attending	Training Delivery	First Date(s) of Training
EPA Webinar – Recent Enhancements to the CMAQ Modeling System	Daugherty, Anthony	Computer/Electronic Based: webinars, on-line, phone	2/27/2019
NACAA Briefing Call on National Compliance Initiatives	Daugherty, Anthony; Dodge, Shane; and White, Janell	Computer/Electronic Based: webinars, on-line, phone	2/14/2019
Easy Air E-Application Call	Daugherty, Anthony	Computer/Electronic Based: webinars, on-line, phone	1/14/2019
DNR Title V Call	Daugherty, Anthony	Computer/Electronic Based: webinars, on-line, phone	2019: 1/10/2019. 2018: 12/13, 11/15, 10/18, 9/20, and 8/22.
Introduction to the Power Sector	Daugherty, Anthony	Computer/Electronic Based: webinars, on-line, phone	12/13/2018
NACAA Air Toxics Committee Call	Daugherty, Anthony	Computer/Electronic Based: webinars, on-line, phone	12/6/2018 and 7/11/2018
EPA Briefing NACAA on Residential Wood Heating NPRM and ANPRM.	Daugherty, Anthony and Drahos, Amy	Computer/Electronic Based: webinars, on-line, phone	12/6/2018
EPA Webinar: 2015 Ozone NAAQS SIP Requirements Rule	Daugherty, Anthony	Computer/Electronic Based: webinars, on-line, phone	11/20/2018
DNR Air Quality Client Contact Meeting	Daugherty, Anthony	Computer/Electronic Based: webinars, on-line, phone	11/8/2018
EPA GHGRP Reporting Year 2017 Data Release	Daugherty, Anthony	Computer/Electronic Based: webinars, on-line, phone	10/24/2018
NACAA Enforcement Call	Daugherty, Anthony and Dodge, Shane	Computer/Electronic Based: webinars, on-line, phone	9/13/2018
4-State Permitting Call	Daugherty, Anthony and Dodge, Shane	Computer/Electronic Based: webinars, on-line, phone	7/17/2018
EPA's Report on the Environment	Dodge, Shane and Drahos, Amy	Computer/Electronic Based: webinars, on-line, phone	6/12/2019
2019 NACAA Spring Meeting	Dodge, Shane and Hodina, James	Conference/Meeting/Training: Physically attend	4/29/2019
EPA Draft FY 2020 - 2021 National Program Guidance	Dodge, Shane	Computer/Electronic Based: webinars, on-line, phone	4/24/2019
DNR AQ/FO Meeting	Dodge, Shane and White, Janell	Conference/Meeting/Training: Physically attend	4/23/2019
EPA 4-State Call	Dodge, Shane	Computer/Electronic Based: webinars, on-line, phone	4/16/2019
EPA Region VII Permitting & Compliance Meeting	Dodge, Shane and Timmerman, Jia	Conference/Meeting/Training: Physically attend	10/10/2018
DNR Fall Local Program Meeting	Dodge, Shane	Conference/Meeting/Training: Physically attend	8/29/2018

Title	Employee(s) Attending	Training Delivery	First Date(s) of Training
NACAA Global Warming Committed	Drahos, Amy	Computer/Electronic Based: webinars, on-line, phone	6/12/2019 and 12/12/2018
NACAA Public Outreach and Education Committee	Drahos, Amy	Computer/Electronic Based: webinars, on-line, phone	6/11/2019
NACAA Ad Hoc Committee on Resilience and	Drahos, Amy	Computer/Electronic Based: webinars, on-line, phone	2019: 6/5, 5/1, 3/7, and 2/6. 2018: 12/5 and 11/7
Air Pollution Dispersion Around Existing Infrastructure	Drahos, Amy	Computer/Electronic Based: webinars, on-line, phone	4/25/2019
Delving Into Passive Techniques for Air Pollution Mitigation	Drahos, Amy	Computer/Electronic Based: webinars, on-line, phone	3/28/2019
Learning Institute - Air Quality	Drahos, Amy	HR Training: Arranged with/by Human Resources	3/7/2019
TV Conference Call	Drahos, Amy	Computer/Electronic Based: webinars, on-line, phone	2019: 3/7 and 2/7. 2018: 9/20
IDNR Fee Advisory Group Meeting – Minor Source	Drahos, Amy	Computer/Electronic Based: webinars, on-line, phone	2/22/2019
NACAA Residential Wood Heating Devices NSPS	Drahos, Amy	Computer/Electronic Based: webinars, on-line, phone	1/16/2019
NACAA - 2015 NSPS Residential Wood Heater Rulemaking Discussion	Drahos, Amy	Computer/Electronic Based: webinars, on-line, phone	12/13/2018
Air Quality Flag Program	Drahos, Amy	Computer/Electronic Based: webinars, on-line, phone	8/28/2018
IEHA 2108 Fall Conference	Hodina, James	Conference/Meeting/Training: Physically attend	10/10/2018
Training Plan - Air Quality Scientist	Lamphier, Carole	Computer/Electronic Based: webinars, on-line, phone	8/20/2018
Training Plan Air Quality Scientist	Lamphier, Carole	Computer/Electronic Based: webinars, on-line, phone	8/13/2018
Training Plan Air Quality Scientist	Lamphier, Carole	Computer/Electronic Based: webinars, on-line, phone	8/6/2018
Training Plan - Air Quality Scientist	Lamphier, Carole	HR Training: Arranged with/by Human Resources	7/30/2018
Training Plan Air Quality Scientist	Lamphier, Carole	Computer/Electronic Based: webinars, on-line, phone	7/23/2018
NACAA Conference Call	Lundberg, Kyle and Mullins, Riley	Computer/Electronic Based: webinars, on-line, phone	4/23/2019
EPA National Air Monitoring Conference	Burns, Dave; Lundberg, Kyle; and Mullins, Riley	Conference/Meeting/Training: Physically attend	8/13/2018
DNR Field Office 6 Roundtable	Mullins, Riley	Conference/Meeting/Training: Physically attend	2/28/2019
Ambient Air Monitoring	Mullins, Riley	Conference/Meeting/Training: Physically attend	2019: 9/6. 2018: 12/19, 11/13, 10/11, 9/26, 9/13, and 8/30
EPA Audits	Mullins, Riley	Conference/Meeting/Training: Physically attend	11/6/2018

Title	Employee(s) Attending	Training Delivery	First Date(s) of Training
Air Monitoring Training	Mullins, Riley	Conference/Meeting/Training: Physically attend	11/1/2018
Quality Assurance	Mullins, Riley	Conference/Meeting/Training	7/19/2018
Fugitive Dust, Incinerators, and Biomass Boilers	Timmerman, Jia	Conference/Meeting/Training: Physically attend	5/6/2019
Smoke School	Timmerman, Jia and White, Janell	Computer/Electronic Based: webinars, on-line, phone	3/19/2019
MACT Training	Timmerman, Jia and White, Janell	Conference/Meeting/Training: Physically attend	7/12/2018
Asbestos Inspector Refresher Training	White, Janell	Conference/Meeting/Training: Physically attend	10/5/2018
Smoke School	White, Janell	Conference/Meeting/Training: Physically attend	9/18/2018

Attachment D

2019 Linn County (LINN) Program Review: Responsiveness Summary

II. Program Management Provisions

H. Personnel – Staff time Expended Report SFY 2019 (table)

LINN Comment: Linn noted that the 1.05 budgeted FTE indicated for Dispersion Modeling should be 0.15 FTE.

DNR Response: Linn is correct. The 1.05 indicated in the Draft Report is in error and should be 0.15. DNR has made the correction in the Final Report.

III. Construction Permitting Provisions

L. Construction Permit Activities

DNR Comment: See Attachment A for general and specific comments on application review. For draft permit review, it does not appear that LINN has provided to DNR a copy of draft permits for NESHAP, NSPS, or PSD synthetic minors as detailed in the contract, see Rockwell Collins and Diamond V South. LINN should ensure going forward that DNR is appraised of these project types and given the chance to review or waive review.

LINN Comment: The expectation for NESHAP, MACT or NSPS at greenfield sites is pretty clear. DNR's comments appear to be directed at PSD synthetic minor projects at Rockwell Collins and Diamond V Mills South. However, the projects referenced for these facilities were synthetic minor limits to avoid Title V, not PSD. Is the intention to expand the scope of this expectation to include SM limits for Title V as well?

We value DNR's input and have a great working relationship with Gary, just want to make sure that we not adding unnecessary work to him and extending turnaround times

DNR Response: LINN is correct. The projects referenced here are TV synthetic minor and not PSD synthetic minor. It is not DNR's intention to expand the requirement to include TV synthetic minors. DNR has deleted the reference to draft permit review and changed the applicable DNR Comment in the Final Report to the following:

Comments: *See Attachment A for general and specific comments on application review. LINN should ensure DNR is appraised of project types requiring draft DNR review and given the chance to review or waive review as mutually agreed.*

V. Compliance and Inspection Provisions

E. Data Management

DNR Comments: DNR recommends that LINN participate in the annual EPA ICIS data verification process to ensure the accuracy of EPA reported data and metrics.

LINN Comment: Shane Dodge and Janelle White are now both on the ECHO data verification email list, and Janelle will be conducting the yearly verification process for Linn County.

DNR Response: The DNR concurs with LINN's comments. No changes made to the Final Report.

VI: Ambient Air Monitoring Provisions

Linn Comments: LINN suggested several minor grammatical changes throughout this section.

DNR Response: The DNR concurs with LINN's suggested changes and has made the changes to the Final Report.

Attachment A: Comments on Specific Construction Permits

The following general issues were noted:

DNR Comment:

...

2) If setting a plant-wide limit in tons per year, the DNR notes that setting anything above 80% of the limit as the trigger point to switch to daily recordkeeping needs to be justified in the evaluation.

LINN Comments: The Department justifies setting the daily recordkeeping trigger higher than 80% for the sole reason that one of two air programs the facility is avoiding is becoming subject to Title V. Once a source becomes subject to Title V, the company has 12 months to submit an initial application. It seems punitive to require daily recordkeeping in these instances, with such a lengthy window to comply with the Title V permitting requirements.

The second air program the facility is avoiding is being a 'major' source of HAPs. Again, once the facility triggers the threshold, the facility is responsible for complying with any applicable MACT. This will involve an Initial Notification, so the Department will be notified in a timely manner pursuant to 40 CFR 63 Subpart A. Regardless whether or not a MACT applies, the facility still has 12 months to apply for a Title V permit to comply with the Title V permitting requirements.

Review of minor source EIQs, quarterly reports, and regular compliance inspections are enforcement tools the Department uses to assess current actual emissions at facilities which are potentially approaching the applicable thresholds.

DNR Response: DNR agrees that it is likely that LINN would discover sources that exceeded their synthetic minor limits through EIQs, reports, etc. DNR sets the trigger value at 80% to ensure that as the company approaches the limit they do not unintentionally have a violation. Additionally, EPA guidance requires daily recordkeeping and DNR has set a policy to reduce the stringency of that requirement when they are not likely to exceed the limit.

No changes made to the Final Report.

DNR Comment:

...

4) When basing synthetic minor or modeling decisions on the potential-to-emit (PTE) based on grain/dry standard cubic foot (gr/dscf) limits, the DNR notes that airflows can vary by +/- 25% without requiring a permit modification. If the PTE is close to the threshold, the DNR suggests using a pound/hour (lb/hr) limit to clarify matters.

LINN Comments: Evaluating PTE for sources based on the potential 25% increase in flow is not standard practice when reviewing construction permits. The DNR Construction Permit Manual makes no mention of this practice being conducted, only mentioning that airflows $\pm 25\%$ requires a new

evaluation. Nonetheless, a lb/hr PM/PM10 limit permit will be added to the RELCO permit prior to PTO issuance.

DNR Response: DNR agrees with LINN that the manual does not mention this practice. However, when a facility is close to a threshold it is important to consider the range of compliance allowed. Limits based on airflow are inherently variable and in some cases may not be suitable for some bright line tests, such as synthetic minors.

No changes made to the Final Report.

The following are permit specific issues:

DNR Comment:

Cargill Corn Processing – Project 2505, ATI 7124. The DNR notes that monitoring frequency is a factor in setting operating parameters, as continuous monitoring might require a larger allowable range in the measured parameter to account for all operating conditions, while a once a week recording may be better off with an allowable range for normal operating conditions.

LINN Comments: DNR’s point is well taken, but in this particular case the facility has continuous monitoring for differential pressure and scrubber flows for most of its air pollution controls. The expanded range is appropriate because the facility captures differential pressure over a much wider range of operating conditions. Common operating conditions that expand the differential pressure range include bag replacement and the use of a variable frequency drives to balance airflow with process demand. This is not unique the Cargill. Many Title V sources request expanded differential pressure drop ranges due to the risk of incurring reportable deviations for conditions that are outside of the “normal range”, but not necessarily indicative of improper operation.

DNR Response: Compliance monitoring is always a case by case decision based on the equipment and operational needs of the company. DNR generally addresses slight exceedances of normal operational parameters through the use of averaging times instead of larger range of limits or reduced frequency of monitoring. The average time allows for short term fluctuations but does not set such a large range that compliance is not certain, nor allow the company to only record values infrequently that are within range. DNR does want companies to notice that there might be operational issues occurring and check into it. Ranges may need to be adjusted as more understanding occurs on normal equipment operation.

No changes made to the Final Report.

Attachment C: Staff Training Summary SFY 2019

LINN Comment: Linn corrected one of the training course entries to indicate that an additional staff member attended the course.

DNR Response: DNR has made the correction in the Final Report.

PSD PUBLIC PARTICIPATION CHECKLIST

Public participation is a requirement under the Prevention of Significant Deterioration (PSD) program. This checklist is provided in order to ensure we meet our obligations under 567 IAC 33.3(17), our work plan with EPA, and our internal requirements. **Do not use this checklist for PSD permit rescissions.**

Preliminary Determination

- ___ 1. Notify the applicant(s) within thirty (30) days as to the completeness of the application or any deficiency in the application or information submitted. In the event of a deficiency, the date of receipt of the application shall be the date on which all required information is received.
- ___ 2. Email a copy of the application to EPA for review, or upload to the website in Step 4(j) and send them the link.
- ___ 3. Within one (1) year after receipt of a complete application, make a preliminary determination as to whether construction should be approved or disapproved.

Public Comment Period

- ___ 4. If the application is approved:
 - ___ (a) Email a copy of all materials submitted by the applicant, a copy of the preliminary determination (draft permits, Technical Support Document/Fact Sheet, etc.), and a copy of other materials, if any, considered in making the preliminary determination to EPA Region VII. For large files, you can upload them to the Iowa DNR public comment search page (see Step 4(g)). EPA must **receive** all materials at least ten (10) days prior to the start of the public comment period.
 - ___ (b) Set the beginning date and the ending date of the public notice period. The period must begin on or after each Thursday (the day EcoNewsWire is published) of every week. At least thirty (30) days shall be provided for the public comment period and for notification of the public hearing, if any
 - ___ (c) Notify the public by using the EcoNewsWire. Send the EcoNewsWire notification to Jason Dowie by the end of the Tuesday prior to the start of the public comment period, with a subject line of "eco-wire news wire notification". If Jason is out of the office, Don Peterson is the backup. Use the document called Final_Ecowire_Notice found in the [\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Con-Perm\Library\General Information\EcoNewsWire](https://iowa.gov.state.ia.us/data/DNR_AQ_Shared/Con-Perm/Library/General Information/EcoNewsWire) as a template for your notification.
 - ___ (d) Print the relevant pages of the eco-news wire publication for the project file. An example is the document called ProofofPublication_example found in the [\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Con-Perm\Library\General Information\EcoNewsWire](https://iowa.gov.state.ia.us/data/DNR_AQ_Shared/Con-Perm/Library/General Information/EcoNewsWire) folder.
 - ___ (e) Create the notice of public comment document. The notice must contain:
 - ___ notice of the application

- ___ notice of the preliminary determination
- ___ notice of the degree of increment consumption that is expected from the source or modification
- ___ notice of the opportunity for comment at a public hearing (if any) as well as written public comment. You may want to limit comments on modified units to what has been modified in the permit. If a public hearing will be held, also include where and when the hearing will be held (usually set towards the end of the public comment period, to provide 30 days notice). Consider holding the hearing at a nearby state park, if appropriate facilities are available. If a hearing date is not set in the original public notice, include a statement that "A request for a public hearing must be received by [date, usually set halfway into the public comment period]. If a public hearing is set, you will need to notify the public again.
- ___ where additional information on the project may be found (iowacleanair.gov and the address of the local library (or other location) where the project documents were sent
- ___ notice that any written comments should be sent to you (include both mail and email addresses).

___ (f) Make the project documents available for public inspection in at least one location (usually a public library) where the project will happen. This includes such things as the public notice, application, draft permits, Technical Support Document/Fact Sheet, a copy of other materials, if any, considered in the project, etc. If a public computer is available for use at the location, it's preferable to send a link to the files on our website for library download, otherwise send a CD or flash drive with the files. Check with the location prior to sending a link or CD/flash drive that this is okay. If none of those options is available, or there is little paper involved in the file, send paper copies. The cover letter/packet must be certified, and should also state the documents only need to be available until [35 days after ending date of the public comment period].

___ (g) Send a copy of the notice of public comment to the following – emails are preferable:

- ___ the applicant
- ___ the Administrator (EPA Region VII)
- ___ Field Office
- ___ officials and agencies having interest in the location where the proposed construction would occur as follows:

- ___ any other EPA Regional office, State, or local air pollution control agencies within the impact area, which is generally within 30 miles of the source (certified. Local programs include Linn and Polk Counties in Iowa, and the City of Omaha in Nebraska)

City of Omaha – email oaqc@ci.omaha.ne.us

Illinois – email brad.frost@illinois.gov

Minnesota – email Beckie.olson@state.mn.us

Missouri – email Kendall.hale@dnr.mo.gov

Nebraska – email ndeq.airquality@nebraska.gov

South Dakota – email airqualityreporting@state.sd.us

Wisconsin – email kristin.hart@wisconsin.gov

- ___ the chief executives of the city and county where the source would be located (i.e. mayor, city administrator, board of supervisors, health department, etc.) (if email addresses are available on city website, email city councilors a copy as well)

- ___ any comprehensive regional land use planning agency (website address is <http://www.iarcog.com/FindCOG.htm>)
 - ___ any State Land Manager whose lands may be affected by the emissions from the source or modification
 - ___ any Federal Land Manager whose lands may be affected by the emissions from the source or modification (certified)
 - ___ any Indian Governing body whose lands may be affected by the emissions from the source or modification (certified. Indian Governing bodies could include the Omaha, Winnebago, and Meskwaki tribes)
 Meskwaki Nation - email director.mdnr@meskwaki-nsn.gov
Coordinator.mdnr@meskwaki-nsn.gov
- ___ (h) Email a copy of the notice to Air Quality managers and Air Quality attorneys.
- ___ (i) Upload public comment documents (public comment notice, draft permits, Technical Support Document/Fact Sheet, correspondence, etc) to the website at <https://programs.iowadnr.gov/airqualityconstructionpermits/Pages/Common/Login.aspx>
- ___ (j) Print the screen shot of the webpage containing the public comment documents available on the web for your project. Note that you will need to be in Google Chrome rather than Internet Explorer. The webpage screen shot containing the document date located in the upper right hand corner must be printed prior to the start of the public comment period.
- ___ (k) If you schedule a public hearing, email Jason Dowie a request to post the public hearing on the website in the email subject line. Include the subject of the meeting, the date, the start time and expected end time, the location, a brief description of the meeting, and any relevant web sites/links for information concerning the project in the email. You can attach a copy of the public notice to the email as well. You will need to specify that the public hearing should be placed on the state calendar as well as the DNR/AQB calendar.
- ___ (l) If, after consultation with management, the public notice is printed in newspapers, email a copy of the public notice to a newspaper of general circulation in each region in which the proposed source would be constructed. Ensure that the date the notice is published falls on or before the start of the public notice. Department policy is to publish the notice in the following:
- ___ Des Moines Register*, Legal Publications, email to legals@dmreg.com
 - ___ Legal Publications of local paper with largest circulation
- *The Gannett Company (Des Moines Register, etc) requires payment at the time the order is placed. You will need to either transfer the newspaper representative to Norma Gentry if using a phone to place the order, or copy her on the email to the newspaper.
- ** Tear sheets should be sent to Norma Gentry.** (ask newspaper to notify you if the legal notice will cost more than \$50 before publishing)
- ___ (m) If you print a public notice in a newspaper, add one hour in the project tracker database under "Technical Review Phase" to account for public notice costs for the public comment period.

- ___ 5. At the end of the 30 day public notice period (plus about 2-3 days to ensure nothing is coming in the mail), make a final determination on whether construction should be approved or disapproved.
- ___ (a) Consider all written comments submitted during the dates specified in the notice of public comment and all comments received at the public hearing(s) in making a final decision on the approvability of the application. Write a response to all comments received letter (or a letter that no comments were received).
 - ___ (b) Notify applicant in writing of the final determination. Also, send a copy of the response to comments to applicant. Include the Polk County local program if the facility is located there.
 - ___ (c) Notify EPA Region VII of the final determination. Also, email a copy of the response to comments and final permits to EPA Region VII.
 - ___ (d) Send a copy of the response to comments to anyone other than the applicant and EPA Region VII that commented during the public comment period.
 - ___ (e) Make all comments received and final determination notification available for public inspection at the same location(s) where the preconstruction information relating to the source were made available. (by certified letter). Include a date after which the information no longer needs to be available (usually 35 days after it's mailed).
 - ___ (f) Upload the final determination (cover letter, response to comments, final permits, etc.) to <https://programs.iowadnr.gov/airqualityconstructionpermits/Pages/Common/Login.aspx>. Place all the project files on the N drive (\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Con-Perm\public comment permits/facility number/projectnumber).
 - ___ (g) Enter BACT determinations into RACT/BACT/LAER Clearinghouse.

PUBLIC NOTICE CHECKLIST (Non-PSD)

This checklist is provided in order to ensure we meet our obligations under 567 IAC 22.2(2), *Public notice and participation*.

- ___ 1. Set the beginning date and ending date of the 30-day public notice period. The period must begin on or after the Thursday that the notice is published on the EcoNewsWire. If the notice is published in a newspaper as well, the beginning date must also be on or after the date the notice is published in the newspaper: You will need to find out from the newspaper when the notice will be published after it is emailed to them.
- ___ (a) The public notice must contain:
- ___ notice of the application
 - ___ notice of the preliminary determination
 - ___ notice of the SIP, Consent Decree or other legal requirements that are being met by the project.
 - ___ notice of the opportunity for comment at a public hearing (if any) as well as written public comment. If a public hearing will be held, also include where and when the hearing will be held (usually set towards the end of the public comment period, to provide 30 days notice for the hearing). Consider holding the hearing at a nearby state park, if appropriate facilities are available. If a hearing date is not set in the original public notice, include a statement that "A request for a public hearing must be received by [date, usually set halfway into the public comment period for non-SIP projects and at the end of the public comment period for SIP projects]. If a public hearing is set as a result of a request, you will need to notify the public again and allow 30 days notice for the public hearing if it is a SIP project.
 - ___ where additional information on the project may be found (iowacleanair.gov and the address of the local library (or other location) where the project documents were sent
 - ___ notice that any written comments should be sent to you (include both mail and email addresses).
- ___ 2. Notify the public by using the EcoNewsWire. Send the EcoNewsWire notification to Jason Dowie by the end of the Tuesday prior to the start of the public comment period, with a subject line of "eco-wire news wire notification." If Jason is out of the office, Don Peterson is the backup. Use the document called Final_Ecowire_Notice found in the \\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Con-Perm\Library\General Information\EcoNewsWire as a template for your notification.
- ___ (a) A SIP public notice, (or other non-PSD projects after consultation with management), shall also be published in a local newspaper of general circulation in the region in which the project will happen. You will need to email the public notice to the Legal Publications section of the newspaper*
- *The Gannett Company (Des Moines Register, etc.) requires payment at the time the order is placed. You will need to either transfer the newspaper representative to

Norma Gentry if using a phone to place the order, or copy her on the email to the newspaper.

**** Tear sheets should be sent to Norma Gentry.**** (ask newspaper to notify you if the legal notice will cost more than \$75 before publishing).

- ___ (b). Upload public comment documents (public comment notice, draft permits, Technical Support Document/Fact Sheet, correspondence, etc) to the website at <https://programs.iowadnr.gov/airqualityconstructionpermits/Pages/Common/Login.aspx>
x
- ___ (c). Print the screen shot of the webpage containing the documents available on the web for your project. Note that you will need to be in Google Chrome rather than Internet Explorer to print the screen shot. The webpage screen shot containing the document date located in the upper right hand corner must be printed prior to the start of the public comment period.
- ___ (d). Print the relevant pages of the eco-news wire publication for the project file. An example is the document called ProofofPublication_example found in the \\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Con-Perm\Library\General Information\EcoNewsWire folder.
- ___ (e). Send copies of the public notice to any person or organization which has expressed an interest in the project. For SIP projects, ask Program Development if these additional notifications are necessary.
- ___ (f). Make the project documents available for public inspection in at least one location (usually a public library) where the project will happen. This includes such things as the public notice, application, draft permits, Technical Support Document/Fact Sheet, a copy of other materials, if any, considered in the project, etc. If a public computer is available for use at the location, it's preferable to send a link to the files on our website for library download, otherwise send a CD or flash drive with the files. Check with the location prior to sending a link or CD/flash drive that this is okay. If none of those options is available, send paper copies. The cover letter/packet must be certified, and should also state the documents only need to be available until [35 days after ending date of the public comment period].
- ___ (g). If you print a public notice in a newspaper, add one hour in the project tracker database under "Technical Review Phase" to account for public notice costs for the public comment period.
- ___ (h). If you schedule a public hearing, email Jason Dowie a request to post the public hearing on the website in the email subject line. Include the subject of the meeting, the date, the start time and expected end time, the location, a brief description of the meeting, and any relevant web sites/links for information concerning the project in the email. You can attach a copy of the public notice to the email as well. You will need to specify that the public hearing should be placed on the state calendar as well as the DNR/AQB calendar.

- ___ 3. At the end of the 30 day public notice period (plus about 2-3 days to ensure nothing is coming in the mail)
- ___ (a) Make all comments received and final determination notification available for public inspection at the same location(s) where the preconstruction information relating to the source were made available. (by certified letter). Include a date after which the information no longer needs to be available (usually 35 days after it's mailed).
- ___ (b) Upload the final determination (cover letter, response to comments, final permits, etc.) to <https://programs.iowadnr.gov/airqualityconstructionpermits/Pages/Common/Login.aspx>. Place all the project files on the N drive (\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Con-Perm\public comment permits/facility number/projectnumber).

ATTACHMENT C: Completed Title V Questionnaire

Returned by IDNR prior to Audit.

[see the attached copy]

Title V Program Self-Evaluation Questionnaire

Iowa Department of Natural Resources
Air Quality Bureau
July 6, 2021

Instructions for completing the Title V Permit Program Self-Evaluation Questionnaire

- When answering Yes or No questions, please add an explanation as appropriate to clarify your response.
- Please skip any sections of the self-evaluation questionnaire that do not apply within your permitting jurisdiction rather than answering hypothetically.
- If you have a written policy or guidance document that substantially answers any question in this self-evaluation questionnaire, please indicate and either attach a hardcopy to your response or point to a specific URL on your public web server where the document may be found.
- This self-evaluation questionnaire was developed by EPA Headquarters and Regions to assist in the agency's Title V oversight program. As part of its peer review process, EPA sought review and comment from STAPPA-ALAPCO. While this questionnaire has undergone a makeover from the original, the scope and detail of the questions asked remains the same for all agencies.

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A. Title V Permit Preparation and Content

Please note - additional documents referenced in some answers are available in the [Iowa Title V Program Review Google Drive folder](#).

1. *What % of your initial applications contained sufficient information so the permit could be drafted without seeking additional information? What efforts were taken to improve the quality of applications if this % was low?*

We do not have statistics on the percentage of initial applications that contained sufficient information. However, as described in Question E.19 below, we do have statistics for 2020 - current. We received 79 initial and renewal applications during this time deeming 13 of 79 (16%) applications to be incomplete. Through the years, we have strived to improve the quality of application through training for permittees and continuous improvements to our application forms. Furthermore, the implementation of Iowa EASY Air has improved the quality of applications as the system includes mandatory data fields and data validation, which prevents the submission of applications with missing or invalid information.

2. *For those title V sources with an application on file, do you require the sources to update their applications in a timely fashion if a significant amount of time has passed between application submittal and the time you draft the permit? Yes.*

- a. *Do you require a new compliance certification? Yes.*

3. *Do you verify that the source is in compliance before a permit is issued and if so, how?*

Yes. Our information requests to other sections help document any non-compliance issues, active construction projects or known issues. The permit writer follows up with the compliance section prior to permit issuance as a last check of recent compliance issues. This is part of our [review manual](#) and [review checklist for drafting Title V permits](#). Copies of the review manual and checklist are also available in the Iowa Title V Program Review Google Drive folder.

- a. *In cases where the facility is out of compliance, are specific milestones and dates for returning to compliance included in the permit, or do you delay issuance until compliance is attained? Yes.* We have done both in the past. It depends on the situation and the length of time the delay in the issuance of the permit will be.

4. *What have you done over the years to improve your permit writing and processing time?*

- We have a defined training plan for new employees. We have used the Kaizen process and value stream mapping several times to review our permitting process and make improvements. These events resulted in changes to our application forms and refinements of our permit review process:
- October 2016 Process Improvement - Representatives from manufacturing, grain processing and utilities participated in a four-day event to improve the Title V permitting process. Six key deliverables were identified and addressed:
- Offer optional pre-application meetings to provide hands-on assistance with the

- application (addressed in 2017 with stakeholder assistance)
- Offer optional post-application meetings to speed permit issuance ((addressed in 2017 with stakeholder assistance))
- Simplify application forms to reduce unnecessary duplicative information requested in application ((addressed in 2017 with stakeholder assistance))
- Clarify critical application elements to make it easier for businesses to provide needed information (completed within 30 days)
- Use business data outputs to reduce duplication (completed within 30 days)
- Reduce lag time by streamlining data sharing between air quality sections (completed within 30 days)
- August 2017 - after considerable input from stakeholders, DNR revised more than 20 forms to improve the Title V Operating Permit application process.

We also have a review manual and review check sheet to aid permit writers in the process of drafting Title V permit. There are a large number of templates used in drafting the Title V permit to promote a consistent final product and speed the permit writing process. Since the inception of the Title V section, we have promoted innovation and a team spirit. We do not need formal events to correct any issues identified in our processes. Once an issue is identified, we brainstorm on solutions and implement the change as soon as possible. These changes in processes are passed along to all permit writers and documented in our review manual.

5. *Do you have a process for quality assuring your permits before issuance? Please explain.*

Yes. An Environmental Specialist Senior reviews all draft permits before they are sent to the facility for facility review. After the Senior Review is complete, the permit writer makes any corrections, and then a draft of the permit is sent to the facility for review. The permit is prepared for public notice after any acceptable corrections suggested by the facility are incorporated. It is our intention that the draft permit on public notice is as close to what the final permit will be as possible.

6. *Do you utilize any streamlining strategies in preparing the permit such as:*

a. *Incorporating test methods, major and minor New Source Review permits, MACTs, other Federal requirements into the Title V permit by referencing the permit number, FR citation, or rule? Explain.*

Yes. Federal standards adopted into Iowa rules as well as federal standards under litigation or not incorporated into our state rules are referenced using a general citation paragraph for the rule. Links to the Federal Register notice for the final rule are included in the appendix of the Title V permit.

b. *Streamlining multiple applicable requirements on the same emission unit(s) (i.e., grouping similar units, listing the requirements of the most stringent applicable requirements)? Describe.*

Our Title V permits are customized to each facility. When it is appropriate, we will combine like sources subject to similar conditions into tables in the Title V permit. If using tables for large groups of sources makes it difficult to understand,

implement and comply with the Title permit requirements, we will look for alternatives such as breaking the tables up into small groups or reformatting them to improve clarity. We issued the first Title V permit using tables to consolidate similar emission sources in 2001 to Vermeer Manufacturing. At that time, the facility had 347 emission units and their initial Title V permit ([99-TV-052](#)) was 600 pages long. They applied for a modification to add new equipment and remove old equipment, and the assigned permit writer identified dozens of the Vermeer's units (e.g. flame cutters, plasma cutters, welders, etc.) that were of identical size and subject to the same emission requirements. She developed a new format to list the equipment in the Title V permit in tables of equipment groups. This reduced the Vermeer Title V permit ([99-TV-052-M001](#)) to 159 pages and made it much easier for the facility, public, and field office inspectors to read.

For large facilities that have multiple functional groups supervised by multiple individuals, we have issued separate Title V permits to each functional group. An example would be the universities with power plant operations and campus operations. The intent is to aid in compliance with the permit conditions by breaking the permit up so that each facility manager is responsible for the operations they have control over.

c. *Describe any other streamlining efforts.*

Title V Fee Portal

In 2020, the DNR introduced a new payment portal for Title V annual emission fees. Facilities now have the convenience of paying Title V emissions fees online. The [online portal](#) utilizes a secure, industry compliant payment page provided by US Bank's Elavon payment processing division. The fees can be paid by credit card or electronic check. Credit card and bank account information is encrypted and is never stored in DNR IT systems. No login is required, and no additional paperwork is necessary. No Form 5.0 is required as the emissions information is provided by State and Local Emissions Inventory System (SLEIS). DNR still accepts payments by mail, but the mail process is not as streamlined as the electronic portal as a paper signed Form 5.0 must accompany each check that is mailed in from SLEIS.

Iowa EASY Air

On December 5, 2019, the DNR introduced a new online permit application system called Iowa EASY Air (Environmental Application System) for air quality permit applications. A [fact sheet explaining the history](#) of Iowa EASY Air is saved in the Iowa Title V Program Review Google Drive folder. The many benefits of using Iowa EASY Air to submit Title V permit applications include:

- Less data entry. Existing emission points, emissions units and control equipment are prefilled for applicants' convenience.
- Accurate data. Guided data entry limits errors and missing data. Built-in data validation helps industries submit accurate, complete applications.
- Streamlines permitting process. Accurate, complete applications cut down time spent calling and emailing between facility, consultant and DNR—speeding the permitting process. While paper applications are still accepted, DNR must enter the data and verification may involve extra steps, slowing the permit issuance.
- Online fee payment. Three options available for paying online.
- Saves time and money. Submitting applications online reduces the facility's internal handoffs and time spent collecting signatures.
- Data sharing. When data is shared between construction permits and operating (Title V) permits, applying for or modifying a permit is easier.
- Inventorying and reporting emissions will be streamlined, too, as SLEIS data is automatically updated when permits are modified or added.

DNR has done extensive marketing of Iowa EASY Air to facility users, and it has high usage rates. The most recent statistics for Title V applications are below in Table 1:

Table 1: Title V permit applications: (12-month rolling total ending June 24)

Submittal Method	Initial & Renewal Applications	Minor & Significant Modifications	Total
Iowa EASY Air	85%	48%	65%
Paper	15%	52%	35%
Iowa EASY Air (current month only)	100%	75%	80%

In 2021, DNR staff conducted an extensive engagement survey of Iowa EASY Air users and facilities that chose not to use Iowa EASY Air. A [copy of the survey results](#) is saved in the Iowa Title V Program Review Google Drive folder, but in summary:

- Of first-time users, 70% gave Iowa EASY Air a rating of "7 - Very Satisfied" to "10 - Extremely Satisfied".
- All Iowa EASY Air users indicated that they would be willing to continue to use Iowa EASY Air for their next permit application.
- Comments from the survey included:
 - *"Painless and much easier than anticipated. Tutorials were good."*
 - *"I liked the EASY Air system. Particularly the validation part to check and make sure all the forms were there and complete."*
 - *"Fastest way to get a permit."*

7. *What do you believe are the strengths and weaknesses of the format of the permits (i.e. length, readability, facilitates compliance certifications, etc.)? Why?* The format of our permits continuously evolves as new regulations are promulgated and we receive feedback from facilities. We think our current format is a good balance between making the permits as succinct as possible while including all applicable requirements to which a facility is subject.

8. *How do you fulfill the requirement for a statement of basis? Please provide examples.*

Our statement of basis is the combination of our fact sheet and our permit writer notes, and we title them as "Fact Sheet". This combination was done at the recommendation of EPA in its 2005 review of our Title V program. Fact sheets for permits currently on public notice may be found on our [Title V Draft & Final Permits website](#) and in the [Iowa EASY Air Public Inquiry Portal](#). We use various fact sheet templates (aka Statements of Basis) that differ by situation - initial permit, renewal, subject due to NESHAP or NSPS only, significant modification, etc. The most frequently used [fact sheet template is for renewals](#).

9. *Does the statement of basis¹ explain?*

- a. *The rationale for monitoring (whether based on the underlying standard or monitoring added in the permit)?* Yes.
- b. *Applicability and exemptions, if any?* Yes.
- c. *Streamlining (if applicable)?* We often streamline the permits by switching the format of the permit from listing every emission source individually into a tabular format that lists similar or like emission sources with similar emission requirements in tables. If we make this formatting change, we do not specifically point this out in the statement of basis. See Question A.6.b for more information about the tabular format.

10. *Do you provide training and/or guidance to your permit writers on the content of the statement of basis?* Yes.

11. *Do any of the following affect your ability to issue timely initial title V permits:*

- a. *SIP backlog (i.e., EPA approval still awaited for proposed SIP revisions?)* No.
- b. *Pending revisions to underlying NSR permits* Yes - occasionally - see answer to Question D.22.
- c. *Compliance/enforcement issues* Yes - occasionally - see answer to Question D.22.
- d. *EPA rule promulgation awaited (MACT, NSPS, etc.)* No.
- e. *Issues with EPA on interpretation of underlying applicable requirements* No.
- f. *Permit renewals and permit modification (i.e., competing priorities)* Yes - occasionally - see answer to Question D.22.
- g. *Awaiting EPA guidance?* No.
 - i. *If yes, what type of guidance?* Not applicable.
 - ii. *If yes, have you communicated this to EPA?* Not applicable.
 - A. *If yes, how did you request the guidance?* Not applicable.
 - B. *If yes, please specify what type of EPA guidance, and how you requested the guidance?* Not applicable.

12. *Any additional comments on permit preparation or content?*

¹ The Statement of Basis sets forth the legal and factual basis for the permit as required by 70.7(a)(5). The permitting authority might use another name for this document such as Technical Support Document, Determination of Compliance, Fact Sheet.

The Title V section strives to issue high quality, technically correct permits in a timely fashion. The section is currently fully staffed and has a strategy in place to issue permits within 9 months of being assigned to a permit writer. We are continuously working to improve our permit writing process, improve Iowa EASY Air, and improve the public notice process.

B. General Permits

The Iowa DNR does not issue General Title Permits. We have a section that covers general permits in our [Iowa Administrative Code under 567 IAC 22.109](#), but have never implemented it. We do offer Small Source Operating Permits as described in section I of this document below.

1. *Do you issue general permits? No.*
 - a. *If no, go to next section*
 - b. *If yes, list the source categories and/or emission units covered by general permits.*

2. *In your agency, can a title V source be subject to multiple general permits and/or a general permit and a standard "site-specific" Title V permit?*
 - a. *What percentage of your title V sources have one or more general permits?*
_____ %

3. *Do the general permits receive public notice in accordance with 70.7(h)?*
 - a. *How does the public or regulated community know what general permits have been written? (E.g., are the general permits posted on a website, available upon request, published somewhere?)*

4. *Is the 5-year permit expiration date based:*
 - a. *On the date the general permit is issued?*
 - b. *On the date you issue the authorization for the source to operate under the general permit?*

5. *Any additional comments on general permits?*

C.Monitoring

1. *How do you ensure that your operating permits contain adequate monitoring (i.e., the monitoring required in §§ 70.6(a)(3) and 70.6(c)(1)) if monitoring is not specified in the underlying standard or CAM?* Our permit writers evaluate the adequacy of monitoring in the Title V permit by following DNR rules under [567 IAC 22.108\(3\)](#) and [DNR's Periodic Monitoring Guidance](#). In situations where the associated construction permit (such as a permit for a paint booth) contains an operating limit that does not have sufficient monitoring requirements, we may add extra recordkeeping and/or reporting.
 - a. *Have you developed criteria or guidance regarding how monitoring is selected for permits? If yes, please provide the guidance.* Yes. The guidance is available at https://www.iowadnr.gov/portals/idnr/uploads/air/insidednr/operpermit/tv_periodic_monitoring.pdf
2. *Do you provide training to your permit writers on monitoring? (e.g., periodic and/or sufficiency monitoring; CAM; monitoring QA/QC procedures including for CEMS; test methods; establishing parameter ranges)* Yes. We provide initial training during the first six months of employment, then provide additional training throughout the year as questions arise.
3. *How often do you “add” monitoring not required by underlying requirements? Have you seen any effects of the monitoring in your permits such as better source compliance?* We include additional monitoring requirements in almost every Title V permit that includes control equipment. When transitioning from initial permits with Agency O&M plans to renewals that include CAM, many facilities find the change relatively seamless since they have already been doing the monitoring for five years. The primary difference between the monitoring in initial Title V permits versus renewal Title V permits is the frequency of measurements typically increases. While we do not have a clear correlation between compliance and additional monitoring, anecdotally, we have seen an improvement in compliance.
4. *Are you incorporating CAM monitoring into your permits?* Yes. We also provide permittees with specific [CAM instructions](#)² and [CAM Calculation spreadsheet](#) to help determine CAM applicability.

² Starting on p. 71 of 77.

D. Public Participation and Affected State Review

Public Notification Process

1. *Do you publish notices on proposed title V permits in a newspaper of general circulation?* No, we historically published notices for one day in the local newspaper, but in approximately April 2018 we stopped doing this and switched to electronic public notices as described in Question D.2 below.
2. *Do you use a state publication designed to give general public notice?* The public notices are sent out on our EcoNews environmental media subscriber list of more than 37,500 and on our [Air Quality Technical Listserv](#) that has a subscriber list of more than 22,000.
3. *On average, how much does it cost to publish a public notice in the newspaper (or state publication)?* Not applicable - we no longer publish notices in newspapers.
4. *Have you published a notice for one permit in more than one paper?* No.
 - a. *If so, how many times have you used multiple notices for a permit?* Not applicable.
 - b. *How do you determine which publications to use?* Not applicable.
 - c. *What cost-effective approaches have you utilized for public publication?* Not applicable.
5. *Have you developed a mailing list of people you think might be interested in title V permits you propose? [e.g., public officials, concerned environmentalists, citizens]*
We currently do not have an active mailing list, but did have one in the past. We encourage interested parties to subscribe to the [Air Quality Technical Listserv](#) to receive public notices via the EcoNews instead of maintaining a separate mailing list.
 - a. *How does a person get on the list?* Anyone can subscribe to the [Air Quality Technical Listserv via our website](#) or by contacting Wendy Walker at wendy.walker@dnr.iowa.gov.
 - b. *How does the list get updated?* Subscriptions are updated upon request.
 - c. *How long is the list maintained for a particular source?* Subscribers remain active until they specifically unsubscribe from the list.
 - d. *What do you send to those on the mailing list?* In addition to public notices, Air Quality Bureau (AQB) technical staff and COM staff make regular contributions to send targeted emails regarding air quality issues, information on DNR's electronic reporting services, and options for public participation.
6. *Aside from publications described above, do you use other means of public notification? If yes, what are they (e.g., post notices on your webpage, e-mail)?*
Yes. Public notices and materials are also available on the [Iowa EASY Air Public Inquiry Portal](#) and on the [Title V Draft & Final Permit website](#).

7. *Do you reach out to specific communities (e.g., environmental justice communities) beyond the standard public notification processes?* Not at this time.
8. *Do your public notices clearly state when the public comment period begins and ends?* Yes. The dates are clearly stated in public notice document, on the website, and on the [Iowa EASY Air Public Inquiry Portal](#). The public notice materials automatically disappear from the portal when the public notice comment period ends.
9. What is your opinion on the most effective avenues for public notice?
 - a. *Are the approaches you use for public notice effective?* We believe our current public notice practices are effective and reach a much wider audience than printing a one-day notice in the newspaper. However, we are always looking for ways to improve our processes.
10. *Do you provide notices in languages besides English?* Not at this time. However, the AQB permitting supervisors met with staff from DNR's Communications Bureau in May 2021 to brainstorm how to address this issue. We are currently researching how other states and other State of Iowa posting issues in other languages. We are also researching the cost and availability of translation services.

Public Comments

11. *Have you ever been asked by the public to extend a public comment period?* Yes.
 - a. *If yes, did you normally grant them?* Yes.
 - b. *If not, what would be the reason(s)?*
12. *Has the public ever suggested improvements to the contents of your public notice, improvements to your public participation process, or other ways to notify them of draft permits? Describe.* No.
13. *Do you provide the public a copy of the statement of basis if they request it? If not, explain.*

Yes, we will email it to them upon request. As mentioned above, it is also available on the [Title V Draft & Final Permits website](#) and is available on the [Iowa EASY Air Public Inquiry Portal](#).
14. *What percentage of your permits have received public comments?* It is quite rare for the public to comment on our permits. We have received citizen comments on less than 1% of all issued Title V permits. Staff can recall receiving public comments on the following five permits as shown in Table 2:

Table 2: Public Comments on Draft Title V Permits

Year	Facility Name	Type(s) of Comments
1998	IPL - Lansing Generating Station	citizen comments on odor and particulate matter deposition
1999	Snap-On Tools Manufacturing	citizen asking general air quality and compliance questions
2012	IPL - Burlington Generating Station	comments on level of monitoring, and stringency/ enforceability of emission limits, level of monitoring
2015	Climax Molybdenum	citizen comments on odor, effects on wildlife, and health concerns
2020	University of Iowa	citizen comments on health effects and climate change

15. *Over the years, has there been an increase in the number of public comments you receive on title V permits? Is there any pattern to types of sources getting comments? We have not seen an increase in the number of public comments. Three of five facilities that received public comments as shown in Question D.14 had coal-fired boilers at the time the comments were received.*
16. *Have you noticed any trends in the type of comments you have received? Please explain.* It is hard to discern a pattern when less than 1% of draft permits receive public comments. Of the five facilities discussed above in Question D.14, two of the five facilities received comments on odor and two facilities received comments pertaining to the health effects of air pollution.
- a. *What percentage of your permits change due to public comments?*
Few, if any, as the many of the handful of citizen comments received have not pertained directly to requirements in the Title V permit.
17. *Have specific communities (e.g., environmental justice communities) been active in commenting on permits?* Not particularly. However, the 2012 comments on IPL - Burlington Generating Station draft permit were organized by the Sierra Club, and the 2020 comments on the University of Iowa draft permit were organized by the Iowa Climate Strike group.
18. *Do your rules require that any change to the draft permit be re-proposed for public comment?* No.
- a. *If not, what type of changes would require you to re-propose (and re-notice) a permit for comment?* If the changes rise to the level of a significant modification, the permit will be re-noticed for those changes. In general, changes have not required re-notice and are documented in the proposed Title V permit and responsive summary that is sent to all commenters. We issue the final Title V permit once EPA approves the changes.

EPA 45-day Review

19. *Do you have an arrangement with the EPA region for its 45-day review to start at the same time the 30-day public review starts? What could cause the EPA 45-day review period to restart (i.e., if public comments received, etc.)?* Yes. If EPA requests their full 45 days, we wait the extra time before proposing the permit and then issuing the final permit.

a. *How does the public know if EPA's review is concurrent?* It is stated in our public notice. Here is an example of the language in the public notice:

"The public comment period for the draft permit will run from May 6, 2021 through June 5, 2021. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Taylor Dailey at the DNR address shown above. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period."

20. *Is this concurrent review process memorialized in your rules, a MOA or some other arrangement?* We have a verbal understanding with EPA Region 7.

Permittee Comments

21. *Do you work with the permittees prior to public notice?* Yes. Our process is to inform the facility when we start the technical review of the application. This introduces them to the assigned permit writer and asks if any changes have taken place since the application was submitted. Usually, if questions arise during the permit review, the permit writer will get in contact with the facility. Once the draft is complete, it is sent to the facility for review. Our default timing is 15 days, but we will extend that when requested.

22. *Do permittees provide comments/corrections on the permit during the public comment period? Any trends in the type of comments? How do these types of comments or other permittee requests, such as changes to underlying NSR permits, affect your ability to issue a timely permit?*

Yes. We receive very few comments from permittees during the public notice period because we provide the facility with a facility review period prior to public notice. The comments we receive from permittees typically focus on typographical errors, periodic monitoring requirements, odor, and questions on construction permit conditions. If a facility has a pending NSR permit or other construction permit pending, we will work with the facility and our construction permitting section to evaluate and determine if it would be advantageous to delay issuance of the Title V permit until the NSR or construction permits are issued.

Public Hearings

23. *What triggers a public hearing on a title V permit?* Public hearings may be scheduled upon written request. However, the request must merit a public hearing. Our public notice states:

"Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to <insert permit writer's name> at the DNR address shown above."

Staff can only recall holding public hearings for one draft Title V permit. Two hearings were held in 2015 for the Climax Molybdenum facility. More detail is provided in the answer to Question D.27.c below.

- a. *Do you ever plan the public hearing yourself, in anticipation of public interest?*
We have not done this so far.

Availability of Public Information

24. *Do you charge the public for copies of permit-related documents?*

Yes, we charge per the [DNR Records Center Schedule of Fees](#).

If yes, what is the cost per page? We provide estimates of the fee and time required to complete the request prior to completing the request. Please refer to the [DNR Records Center Schedule of Fees](#) for details. In general, for file search/research, retrieving /preparation, and copying/scanning, the first hour is free, and then it is \$20 per additional hour. The first 10 paper copies are free and then 10 cents per page.

However, the most recent Title V permit for each facility is available on the [Title V Draft & Final Permits website](#) and all Title V permits issued since January 1, 2020 are available in the [Iowa EASY Air Public Inquiry Portal](#). In addition, we are currently prepping the most recent (previous permit cycle) Title V application and permit paper documents for scanning and uploading into the new OpenText electronic document system.

- a. *Are there exceptions to this cost (e.g., the draft permit requested during the public comment period, or for non-profit organizations)?* There are no exemptions to the schedule of fees.
- b. *Do your title V permit fees cover this cost? If not, why not?*
Title V fees provide sufficient revenue to cover the cost of Title V and Emission Inventory staff assisting Records staff with public records requests. Title V and Emissions Inventory staff report all time spent processing information requests. Requests for minor sources are tracked to the minor source cost center 7220 and requests for Title V sources are tracked to the cost center 7230 for Title V emissions fees. Title V fees provide sufficient revenue to cover the cost of Title V staff assisting Records staff public records requests.

25. *What is your process for the public to obtain permit-related information (such as permit applications, draft permits, deviation reports, 6-month monitoring reports, compliance certifications, statement of basis) especially during the public comment period?*

All construction permitting, stack testing, and compliance documents, including deviation reports, 6-month monitoring reports, and annual compliance certifications, are typically scanned and posted on the [DocDNA public portal](#) within 60 days of receipt. This fall DNR will be transferring all documents from DocDNA to the new [Open Text](#) system.

The most recent Title V permit for each facility is available on the [Title V Draft & Final Permits website](#) and all Title V permits issued since January 1, 2020 are available in the [Iowa EASY Air Public Inquiry Portal](#). In addition, we are currently prepping the most recent (previous permit cycle) Title V application and permit paper documents for scanning and uploading into the new OpenText electronic document system.

Please see our [Records Center website](#) for more information on how to submit a records request.

a. *Are any of the documents available locally (e.g., public libraries, field offices) during the public comment period? Explain.*

A hard copy of the public notice is mailed to the local library. The notice includes information on where the fact sheet and draft permit can be accessed electronically. A copy of the [letter to the library](#) is saved in the Iowa Title V Review Googled Drive folder.

26. *How long does it take to respond to requests for information for permits in the public comment period? Typically, we can respond to information requests in 24 hours or less. However, [Iowa Administrative Code 561 Chapter 2](#) allows up to ten days to respond to a request.*

27. *Have you ever extended your public comment period as a result of information requests? No.*

a. *Where is this information stored?*

NextRequest is an Iowa Department of Administrative Services open records system that is used to track all public information requests made to State of Iowa agencies. Our AQB records staff tracks and logs all public information requests in the [NextRequest](#) and generate a monthly report of public information requests that is provided to the Supervisor of the AQB Program Development Section for review.

b. *Do information requests, either during or outside of the public comment period, affect your ability to issue timely permits? No.*

c. *Have you ever extended the public comment period because of a request for a public hearing?* Yes, in 2015 we received a petition with 40 citizen signatures requesting a public hearing for the draft permit for Climax Molybdenum facility. The original comment period was 03/17/15 - 04/16/15. The public hearing was held 06/25/15. A second public comment period was required due to the facility's discovery of 5 sources subject to Part 63 NESHAPs. The second public comment period was 10/19/2015 - 11/24/2015 and a second public hearing was held 11/24/15.

28. *Do you have a website for the public to get permit-related documents?* Yes. See answers for Question D.25.

a. *What is available online?* See answers for Questions D.25 and D.27.

b. *How often is the website updated? Is there information on how the public can be involved?* The website is continuously updated on a regular basis as permits are placed on public notices. AQB's [Public Participation website](#) also includes information on how the public can be involved.

29. *Have other ideas for improved public notification, process, and/or access to information been considered?* If yes, please describe.

Yes. As mentioned above, we are always looking for ways to improve our processes. We are currently researching ways to provide notices in other languages (see Question D.10 above) and looking at adding additional language for ADA accessibility.

30. *Do you have a process for notifying the public as to when the 60-day citizen petition period starts?* If yes, please describe. We have not developed a formal process as we have yet to receive a citizen petition. If we did receive a petition, we would follow the process outlined in 40 CFR Part 70.

31. *Do you have any resources available to the public on public participation (booklets, pamphlets, and webpages)?* Yes. The AQB provides and continuously updates a public participation website. This [site](#) includes information on how to "[Make Your Comments Count](#)", public meetings, workgroups, and other opportunities for public input.

32. *Do you provide training to citizens on public participation or on title V?* Not at this time.

33. *Do you have staff dedicated to public participation, relations, or liaison?*

Yes. They include:

- Legal and technical specialists who answer specific questions about compliance, and provide guidance to individuals and businesses on technical issues and new online applications. They also survey customer satisfaction; answer frequently asked questions, develop new rules and new online applications. They host public meetings, and meet with stakeholders at DNR-hosted public meetings, highlight

- display booths and speak at commodity trade shows and meetings.
 - Communications and marketing staff who assist with press releases, fact sheets, web pages, layout and design of publications and displays, communications planning, and outreach materials. They develop survey instruments to aid in assessing customer satisfaction or needs, provide advice on handling public meetings or contentious issues, edit documents to translate them from the scientific or regulatory to a level understood by the public, including articles for *Iowa Outdoors* magazine that take an environmental angle. They work with technical staff to fine-tune everything from talking points to PowerPoint presentations. The bureau chief or communications specialist in each topic area responds to media queries on sensitive issues.
- a. *Where are they in the organization?*
They are located in the DNR Communications, Outreach & Marketing (COM) Bureau. A copy of the [table of organization for the COM Bureau](#) is included in the Iowa Title V Program Review Google Drive folder.

b. *What is their primary function?*

See above answer to Question D.33.a.

In addition, both Air Quality Bureau (AQB) technical staff and COM staff make regular contributions to send targeted emails through three GovDelivery products devoted to air quality issues. These products are targeted to specific customer groups with subscriber lists of more than 22,000 people. Public notices are sent almost every week alerting subscribers and the public of permits and soliciting comments on those permits. The public notices are sent out on our EcoNews environmental media subscriber list of more than 37,500.

COM staff also reach out to the public to inform them of the importance of good air quality and to provide the tools to assess air quality. For example, during the recent Air Quality Awareness Week in May, we posted:

- a banner on the DNR homepage
- two news releases to about 37,500 subscribers: [Smoky Air? Protect yourself from wildfires](#) and [Low cost air sensors--adding to our knowledge](#) to about 37,500 subscribers:, and
- a blog [6 Ways to Keep Air Healthy](#) resulting in a potential reach of nearly 1.6 million people through traditional news media outlets, resulting in two broadcast interviews, and open rates of 19 percent (7,397 people) with a 1 percent click-through rate.
- a Facebook post reaching 13,836 people,
- an Instagram story had 2,047 impressions reaching 1,923 people, and
- a tweet resulting in 2,171 impressions with a potential reach of 24,084.

Furthermore, technical, scientific, legal and support staff in the AQB reach out to customers on a one-on-one basis every day, including some who regularly speak at trade group and other stakeholder meetings, providing regulatory and compliance information to customers, along with the latest updates in our online technology. Dedicated staff in the Field Office Bureau reach out to

customers every day, providing down-to-earth explanations on compliance issues as they conduct inspections, provide technical assistance and respond to complaints. AQB and Field Office staff both respond to media queries about technical issues.

Affected State Review and Review by Indian Tribes

34. *How do you notify affected States of draft permits?* We send affected states an email that includes the name of the facility, location, date of public comment period, and a hyperlink to the [Title V Draft & Final Permits website](#) where the draft permit, public notice, and fact sheet are posted.
- a. *How do you determine what States qualify as “affected States” for your draft permits?* We have identified all our facilities' geographic location and created a query in our Microsoft Access database that identifies which states are within the 50-mile radius of a particular state's border.
35. *How do you notify tribes of draft permits?* We have not made specific outreach to tribes.
36. *What percentage of your permits get comments from affected States? from Tribes?*
We cannot recall ever receiving any comments from affected states or tribes.
37. *Is there any pattern to the type of draft permit that gets affected State / Tribal comment? Are there common themes in comments from affected States or Tribes?*
We cannot recall ever receiving any comments from affected states or tribes.
38. *Suggestions to improve your notification process?* None at this time.

Any additional comments and public notification?

E. Permit Issuance / Revision / Renewal

Initial Permit Issuance

1. *If not all initial permits have been issued, do you have a plan to ensure your permits are issued in a reasonable timeframe? If not, what can EPA do to help?*

In 2015 DNR developed a [Title V Permit Issuance Strategy](#). A copy of the strategy is saved in the Iowa Title V Review Google Drive folder. We currently have seven initial permit applications in house. As shown below in Table 3, six of these applications are currently being worked on, and we expect to issue them within eighteen months of receiving them, except for two permits that we are holding to correct compliance issues. The seventh facility has been mothballed but has not withdrawn its application.

Table 3: Initial Permit Applications in House as of 07/01/2021

Facility #	Facility Name	Date Received	Date Assigned	Current Status	DNR Issuance Goal
07-01-107	ConAgra Foods	01/21/20	08/07/20	Public notice completed. Waiting for construction permit modification to be issued to resolve compliance issues.	05/07/21
14-07-002	Templeton Rye Spirits, LLC	11/22/19	12/02/19	In technical review. Waiting for construction permit modifications to be issued to resolve compliance issues.	09/02/20
24-01-035	Continental Carbonic Products	06/08/20	03/22/20	In senior review.	12/21/21
40-01-011	VanDiest Supply Company	03/13/20	04/18/20	In technical review.	01/17/21
72-03-002	POET Biorefining - Ashton	02/06/20	09/29/20	In technical review.	06/29/21
75-05-006	Prairie Sun Foods, LLC	01/02/13	09/10/15	Facility is mothballed.	not applicable
94-01-015	Gold Bond Building Products, LLC	08/24/20	09/29/20	Under facility review.	06/29/21

Permit Revisions

2. *Did you follow your regulations on how to process permit modifications based on a list or description of what changes can qualify for:*

Senate File 488 (signed by Governor Branstad on May 15, 2015) granted the Environmental Protection Commission authority to establish application fees for construction and operation of air pollution emitting equipment and fees for asbestos notifications. The Commission adopted rules ([567 IAC 30](#)) and a [Fee Schedule](#) on December 15, 2015. The fees became effective on January 15, 2016.

Senate File 488 did not give us the authority to charge hourly fees for Title V modifications; we can only bill for initial and renewal applications. Therefore, we have not prioritized issuing modifications since the billable hours rules took effect for initial and renewal applications submitted on or after 01/15/2016.

Any modifications that we have issued since 01/15/2016 have either been done as a training tool for staff or done because there was a specific need such as avoiding non-compliance. Since 01/15/2016, we have issued 102 of the 588 permit modification requests we have received.

- a. *Administrative amendment? (See § 70.7(d)(vi))* - Yes - see [567 IAC 22.111](#).
 - b. *§502(b)(10) changes? (See §70.4(b)(12))* - Yes - see [567 IAC 22.110](#).
 - c. *Significant and/or minor permit modification? (See §70.7(e))* - Yes - see [567 IAC 22.112](#) and [22.113](#).
 - d. *Group processing of minor modifications?* - Yes, when issuing a permit we try to resolve all minor modification requests on file.
3. *If the EPA Regional office has formally asked you to reopen a permit, were you able to provide EPA with a proposed determination within 90 days? (40 CFR 70.7(g)(2)) If not, why not?* We have not been formally asked by EPA Region 7 to reopen a permit.
4. *For those permits that have been issued, and where the permitted facility has undergone a change, how many changes to the title V permit have you processed?* Historically, we have issued 588 total permit modifications.
- a. *What percentage of changes at the facilities are processed as:*
 - i. *Significant* -
 - As of 06/01/21, we have 17 applications from 14 unique facilities for significant modifications in house that we are not acting on.
 - Historically, we have issued 118 significant permit modifications, which is 20% of all issued modifications. Only 32 of those 118 have been issued since the billable hours rules took effect for initial and renewal applications submitted on or after 01/15/16.

ii. *Minor -*

- As of 06/01/21, we have 65 applications from 43 unique facilities for minor modifications in house that we are not acting on.
- Historically, we have issued 286 minor permit modifications, which is 49% of all issued modifications. Only 53 of those 286 have been issued since the billable hour rules took effect for initial and renewal applications submitted on or after 01/15/16.

iii. *Administrative -*

- As of 06/01/21, we have 84 applications from 62 unique facilities in house that we are not acting on.
- Historically, we have issued 160 administrative permit modifications, which is 27% of all issued modifications. Only 17 of those 160 have been issued since the billable hour rules took effect for initial and renewal applications submitted on or after 01/15/16.

b. *Of all changes that you have, how many (or what percentages) were:*

- Off-permit - We rarely process off-permit changes. We have issued 24, which is 4% of all issued modifications. The last off-permit change was issued in 2006.*
- 502(b)(10) - It is unclear what EPA considers to be the difference between off-permits and permits issued under 502(b)(10).*

5. *How many days, on average, does it take to process (from application receipt to final permit amendment):*

- a significant permit revision?*
- a minor revision?*
- an administrative revision?*

This question is not applicable as we are not currently processing permit revisions.

6. *Have you taken longer than the part 70 timeframes of 18 months for significant revision, 90 days for minor permit revisions and 60 days for administrative? Explain.*
Yes. See answer to Question E.2 above.

7. *What have you done to streamline the issuance of revisions?*

See answer to Question E.2 above.

8. *What process do you use to track permit revision applications moving through your system? Historically, we have tracked permit revision applications and processing milestones in a Microsoft Access database. As use of Iowa EASY Air is currently voluntary, we continue to receive some paper revision applications. Therefore, as we transition to using Iowa EASY Air, we use the Access database to track both paper and electronic revision applications.*

9. *Have you developed guidance to assist permit writers and sources in evaluating whether a proposed revision qualifies as an administrative amendment, off-permit*

change, significant or minor revision, or requires that the permit be reopened? If so, provide a copy. Yes, we have developed a [Title V Operating Permit Modification Quick Reference Sheet](#) that explains the differences between administrative amendments, minor modifications, and significant modifications. It does not address off-permit changes as we rarely, if ever, process those. In addition, our application requires the permittee to identify the type of modification that they are applying for.

10. *Do you require that source applications for minor and significant permit modifications include the source's proposed changes to the permit?*

No. We have discussed using this in the past and some facilities will provide a redline/strikeout version. It can be more work for the permit writer to proofread their changes than just modifying the previous permit or drafting a new permit.

a. *For minor modifications, do you require sources to explain their change and how it affects their applicable requirements? Yes.*

11. *Do you require applications for minor permit modifications to contain a certification by a responsible official, consistent with 70.5(d), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used?*

Yes. All of our application forms, including the [Title V Form EZ MOD](#) require certification by the responsible official.

12. *When public noticing proposed permit revisions, how do you identify which portions of the permit are being revised? (e.g., narrative description of change, highlighting, different fonts).*

Yes. They are described in the permit writer notes, which are attached to the bottom of the fact sheet.

13. *When public noticing proposed permit revisions, how do you clarify that only the proposed permit revisions are open to comment? It is mentioned in the last paragraph of our public notice language:*

“DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the application for permit modification. The responsiveness summary and the final permit will be available to the public upon request.”

Permit Renewal or Reopening

14. *Have you begun to issue permit renewals? Yes. As of July 1, 2021, we have 269 active issued final Title V permits as listed below in Table 4. A [list of these permits](#) is also included in the Iowa Title V Review Google Drive folder.*

Table 4: Final Title V Permits as of 07/01/2021

Current Version	Number of Permits
Initial	32
Renewal 1	55
Renewal 2	64
Renewal 3	105
Renewal 4	13
Total	269

15. *What are your plans for timely issuance of the renewals?* We have a detailed Title V Permit Issuance Strategy. In short, our goal is to issue Title V Permits within nine months of assignment to the permit writer. The EPA goal is for permits to be issued within eighteen months of receiving the application. A copy of the [strategy](#) is saved in the Iowa Title V Review Google Drive folder. We currently have twelve renewal applications in house that are older than eighteen months as shown in Table 5 below:

Table 5: Renewal Applications older than 18 months

Facility #	Facility Name	Renewal Type	Date Received	Current Status
78-01-012	Griffin Pipe Products CO., LLC	Renewal (2)	12/20/11	Facility is mothballed but maintaining its permits.
90-01-023	Praxis Mid America	Renewal (2)	09/07/11	Facility is mothballed but maintaining its permits.
23-01-006	ADM Corn Processing - Clinton	Renewal (1)	06/03/11	ADM will submit updated application by 6/30/2022.
68-09-001	Cargill, Inc. - Eddyville, IA	Renewal (1)	04/15/11	Technical Review
94-01-010	Georgia-Pacific Gypsum LLC	Renewal (3)	12/29/16	Holding for construction permits to be issued. Construction app submitted 5/21/2021.
88-01-021	ZFS Creston, LLC	Renewal (2)	11/14/16	Technical Review

Table 5 (continued)

Facility #	Facility Name	Renewal Type	Date Received	Current Status
07-02-005	Cedar Falls Municipal Electric Utility	Renewal (3)	04/25/18	Facility Review
31-01-009	John Deere Dubuque Works	Renewal (3)	12/10/18	Technical Review – held for nearly a year waiting for determination request sent to EPA in May 2020, but decided in Feb. 2021 to proceed.
77-01-045	ADM - Des Moines Soybean	Renewal (2)	10/19/18	Holding while compliance and construction permitting issues are resolved.
78-01-085	Bunge Corporation	Renewal (3)	10/18/18	Facility Review
82-02-004	Sivyer Steel Castings LLC	Renewal (2)	10/01/18	Facility Review
63-01-001	3M (Minnesota Mining & Manufacturing Co.)	Renewal (3)	11/08/19	Facility Review

16. *Do you have a different application form for a permit renewal compared to that for an original application? (e.g., are your application renewal forms different from the forms for initial permits?)* No. It is the same process as the initial permit process and requires a complete resubmittal of all application materials. Using Iowa EASY Air instead of submitting a paper application should simplify the process. There is some additional data entry the first time the applicant uses Iowa EASY Air, but it simplifies the renewal process as the information within the application and any construction permits are carried forward to the next renewal application.

b. *If yes, what are the differences? Are first time requirements (like CAM, off permit changes, etc.) in a renewal application being included in the renewal?* As discussed in the answer to Question E.16, there are no differences. Yes, first time requirements such as CAM are included in the renewal.

17. *Has issuance of renewal permits been “easier” than the original permits? Explain.* No. We had hoped renewals would be easier, but it has not turned out to be the case. New regulations that had been promulgated since the initial Title V permits were issued have introduced delays in the processing of applications. Many required the creation of new application forms for engines and boilers. As staff have become more experienced, the identification of issues with applications and past permitting problems have delayed permit processing. Additional scrutiny by EPA on permit

limits and recordkeeping have also caused slow-downs. These were warranted as the comments addressed some past permitting practices that are not adequate in being practically enforceable. Turnover in both in DNR permit writers and lead workers as well as permittee environmental professionals has also added to the problem. Some of the issue just comes down to facilities making lots of changes in the five-year permit term and not being able to keep the Title V current.

18. *How are you implementing the permit renewal process (i.e. guidance, checklist to provide to permit applicants)?*

It is the same process as the initial permit process and requires a complete resubmittal of all application materials. Using Iowa EASY Air instead of submitting a paper application should simplify the process. There is some additional data entry the first time the applicant uses Iowa EASY Air, but it simplifies the renewal process as the information within the application and any construction permits is carried forward to the next renewal application.

19. *What % of renewal applications have you found to be timely and complete?*

It is rare to have a late renewal application, but it does happen. If that happens, we work with our Compliance Assistance section and the facility to get a complete application as soon as possible. The Title V permit staff then work to ensure that the permit renewal is issued before the previous permit expires.

Regarding completeness, we do not have statistics on the total number of renewal applications that contained sufficient information to be deemed complete. However, we do have statistics for 2020 – June 7, 2021. We received a 79 initial and renewal applications during this time period deeming 13 of 79 (16%) as incomplete. There does not seem to be a clear pattern to why the applications are incomplete. Different types of information are missing in each application. These include missing signatures, missing pages of general facility requirements, missing Part 2 forms, missing insignificant emission units, etc. Applications submitted on paper tend to be incomplete more often than applications submitted in Iowa EASY Air, as Iowa EASY Air requires mandatory fields to be completed and data validated prior to submission.

20. *How many complete applications for renewals do you presently have in-house ready to process? As of June 7, 2021, we have 65 renewal applications in-house and all have been deemed complete.*

21. *Have you been able to or plan to process these renewals within the part 70 timeframe of 18 months? If not, what can EPA do to help?*

Nine of the 65 renewal applications in-house have exceeded the 18-month timeline. This is primarily due to the turnover of Title V staff or outstanding compliance issues. We intend to issue the majority of these permits in the next year. One facility, ADM Corn Processing - Clinton, is planning to submit an updated application in the next year. Two of the renewal applications are for mothballed facilities. We are not aware of any assistance needed from EPA at this time.

22. *Have you ever determined that an issued permit must be revised or revoked to assure compliance with the applicable requirements?*

No, not that we can recall. Some permits have needed modification later if applicability changed due to a rule change or additional information has been discovered that affected applicability.

F. Compliance

1. Deviation reporting:

- a. *Which deviations do you require to be reported prior to the semi-annual monitoring report? Describe.*

Excess emissions, Continuous Emissions Monitoring deviations (quarterly), and deviation reporting required by federal regulations (i.e. NESHAP and NSPS), must be reported prior to the Semi-Annual Monitoring Report (SAMR). Unless more frequent deviation reporting is specified in the permit, all other deviations that take place during the reporting period are documented in the SAMR. Monitoring required under a Title V Permit typically includes, but is not limited to, recordkeeping, stack testing, visible emissions observations, and operation and maintenance (O&M) plans.

- b. *Do you require that some deviations be reported by telephone?*

Title V Permit [General Condition G14: Written Reporting of Excess Emissions](#) allows an initial reporting of excess emissions be reported by email, in person, or by telephone.

- c. *If yes, do you require a followup written report? If yes, within what timeframe?*

Yes. Per [Title V General Condition G14: Written Reporting of Excess Emissions](#), a written report of an incident of excess emission shall be submitted as a follow-up to all required initial reports to the department within seven days of the onset of the upset condition.

- b. *Do you require that all deviation reports be certified by a responsible official (RO)? (If not, describe which deviation reports are not certified).*

No, deviation reports are not required to be certified by the RO. However, the Title V Annual Certification and Semi-Annual Monitoring Reports require RO certification.

- i. *Do you require all certifications at the time of submittal? Yes, the certification must be signed by the RO when the Title V certifications and reports are submitted.*
- ii. *If not, do you allow the responsible official to “back certify” deviation reports? If you allow the responsible official to “back certify” deviation reports, what timeframe do you allow for the followup certifications (e.g., within 30 days; at the time of the semi-annual deviation reporting)? Not applicable.*

2. *How does your program define deviation?* A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated in [Title V General Conditions G13. Hazardous Release and G14. Written Reporting of Excess Emissions](#). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification. See also [Title V General Conditions G4. Annual Compliance Certification and G5. Semi-Annual Monitoring Report](#) and [567 IAC 22.108\(5\)"b"](#).

c. *Do you require only violations of permit terms to be reported as deviations?* No.

d. *Which of the following do you require to be reported as a deviation (Check all that apply):*

i. *excess emissions excused due to emergencies (pursuant to 70.6(g))?*
Yes, per [Title V General Condition G14\(3\)](#):

"G14.(3) Emergency Defense for Excess Emissions. For the purposes of this permit, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:

- a. *An emergency occurred and that the permittee can identify the cause(s) of the emergency;*
- b. *The facility at the time was being properly operated;*
- c. *During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and*
- d. *The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice fulfills the requirement of paragraph 22.108(5)"b." – See G15. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.*

In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or upset provision contained in any applicable requirement." [567 IAC 22.108\(16\)](#)

ii. *excess emissions excused due to SIP provisions (cite the specific state rule)?* No. [567 IAC 24.1\(1\)](#) has specific requirements for excess emission during periods of startup, shutdown, or cleaning control equipment:

"Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is

accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period."

- iii. *excess emissions allowed under NSPS or MACT SSM provisions? Yes and no. It depends on the SSM provisions in the specific NSPS or MACT.*
- iv. *excursions from specified parameter ranges where such excursions are not a monitoring violation (as defined in CAM)? Yes.*
- v. *excursions from specified parameter ranges where such excursions are credible evidence of an emission violation? Yes.*
- vi. *failure to collect data/conduct monitoring where such failure is "excused"? Yes.*
 - A. *during scheduled routine maintenance or calibration checks: [567 IAC 24.1\(1\)](#) has specific requirements for excess emission during periods of startup, shutdown, or cleaning control equipment:*

"Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period."

- B. *where less than 100% data collection is allowed by the permit? Yes.*
- C. *due to an emergency? Yes.*
- D. *Other? Not applicable.*

- 3. *Do your deviation reports include:*
 - a. *The probable cause of the deviation? Yes.*
 - b. *Any corrective actions taken? Yes.*
 - c. *The magnitude and duration of the deviation? Yes.*
- 4. *Do you define "prompt" reporting of deviations as more frequent than semi-annual? Yes.*
- 5. *Do you require a written report for deviations? Yes.*
- 6. *Do you require that a responsible official certify all deviation reports? No.*
- 7. *What is your procedure for reviewing and following up on:*
 - a. *deviation reports? DNR Compliance staff review to ensure the required information is provided and the facility has taken action to correct the issue.*
 - b. *semi-annual monitoring reports (SAMR)?*

DNR Compliance staff review the reports following these six steps:

 - 1. *Review the indicated current compliance status. If the facility is not currently in compliance, a compliance plan is required to be submitted with the Annual Compliance Certification (ACC) or SAMR.*
 - 2. *Cross check the Compliance Tracking database, Field Office Compliance*

Database (FOCD), and most recent inspection for compliance issues that should be included in the report. If deviations are found that are not identified in the ACC/SAMR, the facility should be contacted for an updated report or a justification for not reporting the information.

3. Review previous ACC or SAMR to determine if the same deviations were reported previously.
4. Enter the report into the TV Compliance Report database.
5. For ACC's only, enter the report into ICIS as a compliance monitoring activity.
6. Update the Compliance Tracking Database with any provided compliance plans and/or any NOVs issued as a result of disclosed deviations.

c. *annual compliance certifications (ACC)?* See above. Same procedures as for reviewing SAMR.

8. *What percentage of the following reports do you review?*

- a. *deviation reports?* All deviation reports received are reviewed. However, if the issue appears to be resolved and emissions were minimal, there will not be any follow up by DNR Compliance staff.
- b. *semi-annual monitoring reports?* 100% are reviewed.
- c. *annual compliance certifications?* 100% are reviewed.

9. *Compliance certifications*

a. *Have you developed a compliance certification form? If no, go to Question F.7.*

Yes, we have developed both an [ACC and a SAMR form](#).

- i. *Is the certification form consistent with your rules?* Yes
- ii. *Is compliance based on whether compliance is continuous or intermittent or whether the compliance monitoring method is continuous or intermittent?* Yes - both.
- iii. *Do you require sources to use the form?* No.
What percentage do? We do not track this. Many facilities use their own Microsoft Excel documents that allow them to easily update their ACC.
- iv. *Does the form account for the use of credible evidence?*

Title V General Condition G11 allows use of any credible evidence as follows:

"G11. Evidence used in establishing that a violation has or is occurring. Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein.

1. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:
 - a. A monitoring method approved for the source and incorporated in an operating permit pursuant to [567 Chapter 22](#);
 - b. Compliance test methods specified in [567 Chapter 25](#); or
 - c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to [567 Chapter 22](#).
2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a. Any monitoring or testing methods provided in these rules; or

- b. *Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in [subrule 21.5\(1\)](#) or this subrule." 567 IAC 21.5(1)-567 IAC 21.5(2).*

v. *Does the form require the source to specify the monitoring method used to determine compliance where there are options for monitoring, including which method was used where more than one method exists? Yes, we require all requirements to be reported, including monitoring methods.*

10. *Excess emissions provisions:*

- a. *Does your program include an emergency defense provision as provided in 70.6(g)? Yes, the Iowa rule [567 IAC 22.108\(16\)](#) is the same as 70.6(g) and is included in the [Title V General Conditions in G14\(3\)](#):*

"G14.(3) Emergency Defense for Excess Emissions. For the purposes of this permit, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:

- a. *An emergency occurred and that the permittee can identify the cause(s) of the emergency;*
- b. *The facility at the time was being properly operated;*
- c. *During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and*
- d. *The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice fulfills the requirement of paragraph 22.108(5)"b." – See G15. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.*

In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or upset provision contained in any applicable requirement." 567 IAC 22.108(16)

If yes, does it:

- i. *Provide relief from penalties? No, same as 70.6(g).*
- ii. *Provide injunctive relief? No, same as 70.6(g).*
- iii. *Excuse noncompliance? No, same as 70.6(g).*

- b. *Does your program include a SIP excess emissions provision? Yes.*

If no, go to 6.c. If yes does it:

- iv. *Provide relief from penalties? No.*
- v. *Provide injunctive relief? No.*
- vi. *Excuse noncompliance? No.*

- c. *Do you require the source to obtain a written concurrence from the PA before the source can qualify for:*
 - i. *the emergency defense provision? Yes and no. It depends on the circumstance.*
 - ii. *the SIP excess emissions provision? No.*
 - iii. *NSPS/NESHAP SSM excess emissions provisions? No.*

11. *Is your compliance certification rule based on:*

- a. *the '97 revisions to part 70 - i.e., is the compliance certification rule based on whether the compliance monitoring method is continuous or intermittent; or:*
- b. *the '92 part 70 rule - i.e., is the compliance certification rule based on whether compliance was continuous or intermittent? It is based on both revisions.*

12. *Any additional comments on compliance?*

G. Resources & Internal Management Support

1. *Are there any competing resource priorities for your “title V” staff in issuing Title V permits?*

a. *If so, what are they?*

Not for the Title V permit writers as their primary job duties are reviewing and issuing Title V permits (see Question G.9 below). Staff in the Program Development (PD) & Support and Compliance sections support the Title V program as part of normal job duties, but they do have other job duties:

- Support staff running the Iowa EASY Air Help Desk staff provide assistance to both the Title V and Construction Permitting portions of Iowa EASY Air.
- PD & Support staff assisting with records and the financial components of Title V work in other activities within the Bureau.
- Compliance staff also support activities across the Bureau.

2. *Are there any initiatives instituted by your management that recognize/reward your permit staff for getting past barriers in implementing the title V program that you would care to share?*

We do not have a formal recognition or reward program, but outstanding performance or compliments by facilities are documented in emails shared with the Bureau Chief (BC), Division Administrator and upper management. It is also documented in the permit writer's annual performance evaluation.

3. *How is management kept up to date on permit issuance?*

The supervisor meets with the Bureau Chief (BC) on a weekly basis and writes a detailed bi-weekly report for the BC. The BC then passes that information on to upper management. In addition, the Title V staff continuously tracks permit issuance in real time using a data visualization board called Trello. The BC has access to the Trello board and can check it at any time. Representatives from the local programs, Compliance section, and Construction Permitting section also have access to the Trello board. For more details, please see [Good Practices not addressed elsewhere in this questionnaire](#).

4. *Do you meet on a regular basis to address issues and problems related to permit writing?*

Yes as follows:

- Each permit writer has impromptu Google Chats and Google Meets with their assigned leader as necessary.
- The supervisor and two lead workers meet weekly to discuss permit writing.
- Each permit writer has an individual meeting every 3-4 weeks with the supervisor and their assigned lead worker.
- All Title V staff and representatives from the local programs, Program Development section, Compliance Section, Construction Permitting section meet at least once a month to discuss issues and problems.
- A representative from the Title V and Emissions Inventory also attends the other sections' staff meetings to ensure we are working collaboratively.

5. *Do you charge Title V fees based on emission volume?*

a. *If not, what is the basis for your fees?*

The Title V emission fee is calculated by dividing the estimated Title V emission budget by the chargeable emissions as reported by facilities each March 31. Per [Iowa Code 455B.133B](#) and [567 IAC 30.4](#), the Title V emission fee is assessed on the first 4,000 tons of each regulated air pollutant emitted each year from each major stationary source in the state. Regulated pollutants include: particulate matter less than 10 micrometers in diameter (PM10), sulfur dioxide (SO₂), nitrogen oxides (NO_x), volatile organic compounds (VOC), lead (Pb), and hazardous air pollutants (HAP). Greenhouse gas emissions are not subject to Title V fees.

In 2015, the Iowa General Assembly amended [Iowa Code 455B.133B](#) to authorize application fees. The Environmental Protection Commission adopted rules ([567 IAC 30](#)) and a [Fee Schedule](#) on December 15, 2015. The application fees became effective on January 15, 2016.

b. *What is your Title V fee?*

The Title V emission fee is \$70/ton on the first 4,000 tons of each regulated air pollutant. The Title V application fee is \$100/hour.

6. *How do you track title V expenses?*

Personnel expenses are the largest Title V expenses. Staff use activity codes to track activities. Reports are generated frequently and provided to management for review. Non-personnel expenses are tracked by the DNR's Budget & Finance Bureau. Expense reports are provided monthly, and the Program Development staff review the reports for accuracy.

7. *How do you track title V fee revenue?*

Fees are received by mail, online payment, or by credit card over the phone. Mailed fees and fees paid by phone are sent to the cashier for processing. Program Development staff review payments prior to depositing to ensure the funds are placed into the appropriate account. Online payments are automatically deposited into appropriate accounts. While daily reports are accessible, a monthly summary of deposits is provided to the Bureau. The [current revenue](#) report is included in the Iowa Title V Program Google Drive folder.

8. *How many Title V permit writers does the agency have on staff (number of FTE)?*

Five full-time equivalent (FTE) positions for Title V permit writers (environmental specialists) and two FTE positions for Title V lead workers (environmental specialist seniors) are budgeted on an annual basis. FTE reports are available upon request.

In addition, the Polk County and Linn County local programs have FTE assigned to Title V permit writing. The allocation for Linn County is 0.33 for SFY 2021 and 0.37 for SFY 2022. Polk County's allocation is 0.67 for SFY 2021 and 0.59 for SFY 2022. It is important to note that the budgeted FTE allocations vary year to year for both

local programs depending on the number of expected initial and renewal applications and permit complexity. Polk has a dedicated staff person, so their FTE allocation is higher than Linn County's. The actual FTE allocation each year depends on actual circumstances at the time.

9. *Do the permit writers work full time on Title V?*

Yes, however since all five permit writers were hired in the past fourteen months, they spent a large percentage of time on training as shown below in Question G.9.a.

a. *If not, describe their main activities and percentage of time on title V permits.*

For the time period July 1, 2020 - May 27, 2021, the five permit writers spent 76% of their working hours on permit writing and 21% on training as shown below in Table 6. The remaining 3% of their time was spent on unspecified activities such as bureau and department meetings. These figures do not include vacation, sick leave, or breaks.

Table 6: Title V Permit Writer Work Activities

Activity	Hours Worked	Percentage of Total Hours
Permit Writing - Billable Hours	3,585.75	44%
Permit Writing - Non-Billable Hours	2,419.50	30%
Permit Writing - Modifications	130.00	2%
Training	1,718.50	21%
Unspecified (such as bureau meetings, department meetings, etc.)	248.75	3%
Total	8,107.5	100%

b. *How do you track the time allocated to Title V activities versus other non-title V activities?*

Staff code every hour of their work time to a specific activity code for what they are working on. These hours and codes are reported on their biweekly timesheets. They also track the daily billable hours for each billable Title V activity in Iowa EASY Air. The supervisor reviews all timesheets and billable hours in Iowa EASY Air for each two week period prior to approving timesheets and the billable hours in Iowa EASY Air. The hours for each code and staff member are tracked in an Excel spreadsheet. Work activities and billable hours are reported quarterly by the local programs and reviewed.

10. *Are you currently fully staffed?* Yes, the Title V section has been fully staffed since February 2021. A [table of organization](#) for the section is saved in the Iowa Title V Review Google Drive folder.

11. *What is the ratio of permits to permit writers?* As of June 1, 2021, the ratio of initial & renewal permit applications to permit writers is 25:1.

12. *Describe staff turnover.*

Staff turnover in the past has been very high, but has stabilized since February 2020. Over sixty different permit writers have worked in the section at some point. Previously, the union contract allowed for fairly easy transfers among DNR bureaus based on seniority, but that option has been removed from the union contract in the past three years. The entire Title V section except for two staff members turned over in 2019 – 2020 due to retirements, promotions, or employment outside of DNR.

As the program has matured, there are now more applications for permit renewals than for initial permits and the time it takes to issue permits has on average declined. In 2017, DNR re-evaluated staffing levels and the role of senior staff, and recommended a re-alignment of staffing levels to more closely match the current work-load. Following feedback from the 2017 stakeholder Funding Work Group, three Title V permit writers were laid off November 13, 2017. Reevaluating which services provided real added value led to rebalancing staff assignments and has resulted in a doubling of staff time spent on the primary activities of drafting initial and renewal permits and modifications.

a. *How does this impact permit issuance?*

Turnover significantly reduces permit issuance as it may take several months to fill a vacant position and then up to six months to train the new employee. Our permit issuance for goals for 2019 and 2020 were 56 permits each year, but we were only able to issue 49 in 2019 and 34 in 2020 due to high staff turnover.

b. *How does the permitting authority minimize turnover?*

One factor that leads to turnover is the nature of Title V permit writing. It takes a long time to issue a Title V permit, which can lead to feelings of a lack of short term rewards or success. We try to assign small special projects to each permit writer to keep them engaged and encourage them to receive training in areas that interest them. We also strive to continuously improve the Title V permitting process and are careful to solicit and value input from the permit writers.

13. *Do you have a career ladder for permit writers?*

a. *If so, please describe.*

All of our permit writers are classified as environmental specialists. The next promotion level available is environmental specialist senior, which typically does not turn over very often, and when it does, is extremely competitive. There are also opportunities for environmental specialists in other AQB sections and DNR bureaus.

14. *Do you have the flexibility to offer competitive salaries?*

No. When we hire staff we are required to start them at the bottom of the salary range for that job classification. If the staff person is a current DNR employee that is being promoted and currently earns more than the bottom of the pay range, we can generally offer them a 5% pay increase. The salary ranges for each job class are set by the Department of Administrative Services.

15. *Can you hire experienced people with commensurate salaries?*

In general, no we cannot. Experienced applicants with direct air quality experience typically earn more in the private sector than the bottom of the DNR pay range. However, the low health insurance cost, excellent retirement, and other good benefits help make our jobs attractive to applicants. We recently offered a Title V environmental specialist position to the environmental contact at a Title V facility, and he declined as he is making \$30,000 more than what we offered him.

16. *Describe the type of training given to your new and existing permit writers.*

New permit writers receive both the standard training for all new DNR employees as well as specific air quality training. The majority of the standard DNR training is completed within the first two weeks of employment and includes the following topics:

- Safety,
- ADA/508 Compliance,
- Disability Awareness,
- Unleashing the Power of Diversity,
- Preventing Sexual Harassment,
- Equal Employment Opportunity & Affirmative Action,
- IT Security Training,
- State Policies, and
- Most Valuable Resource - Career Empowerment.

Each new employee is also partnered with a DNR mentor for at least one year. The air quality-specific training is then started and takes several months. The first three months of training are spent reading instructional materials, taking on-line courses, and discussing on-the-job permitting activities. An [example training plan](#) is provided in the Iowa Title V Program Review Google Drive folder. Training classes include, but are not limited to:

- SI-422 Air Pollution Control Orientation,
- APTI 460: Introduction to Permitting,
- SI-431: Air Pollution Control Systems for Selected Industries,
- RE-100: Basic Concepts in Environmental Sciences - Module 6 Air Pollutants and Control Techniques, and
- S1-437: modules for fabric filters, electrostatic precipitators, and wet scrubbers.

New employees work with their lead worker throughout this time period and also attend section meetings of the other AQB groups - Construction Permitting,

Compliance Assistance, Program Development, Emissions Inventory, and Support - to learn the role of those sections within the AQB and how they interact with the Title V group.

Then the new employees begin hands-on training several times a week with their lead worker to learn about air quality rules, instructions, forms, Iowa EASY Air, permitting templates, periodic, monitoring, CAM, etc. We had four new employees start within two months of each other in Feb - April 2020, so the Title V lead workers held bi-weekly group training sessions with them for over nine months. A fifth permit writer was added in February 2021. He meets several times a week with his lead worker, and now group training sessions with all five permit writers are held a few times a month.

Staff are also encouraged to participate in on-going training throughout the year. These classes may include but are not limited to:

- Software training such as Excel, Access, Pivot Tables, etc.
- Professional Development Seminars,
- CAM Workshop
- New Source Review Workshop
- Control of Particulate Emissions
- Control of Gaseous Emissions,
- NOX Control Technology, and
- Technical Writing.

Finally, each employee has a 5-year Professional Development & Training Plan. This plan is reviewed at least annually with the employee's performance evaluation.

17. *Does your training cover:*

- a. *how to develop periodic and/or sufficiency monitoring in permits? Yes.*
- b. *how to ensure that permit terms and conditions are enforceable as a practical matter? Yes.*
- c. *how to write a Statement of Basis? Yes.*

18. *Is there anything that the EPA can do to assist/improve your training? Please describe.*

The transition from the APTI registration site to the new EPA LMS training system has not been smooth. Several APTI classes are not in the LMS or have been renamed/renumbered. CenSARA started requiring registration for their classes to be done in the LMS, but it did not work correctly, so CenSARA has returned to its own registration system.

19. *How has the permitting authority organized itself to address Title V permit issuance?*

The DNR established a Title V Operating Permit section. The staff in the section focus on the review of Title V applications and issuance of Title V permits. Currently the section has five environmental specialists who write Title V permits and perform completeness reviews. The section also has two environmental specialist seniors

who review draft permits, write Title V permits, train staff, and perform other duties. The DNR also established a Title V Permit Issuance Strategy. In short, our goal is to issue Title V Permits within 9 months of assignment to the permit writer. A copy of the [strategy](#) is saved in the Iowa Title V Review Google Drive folder.

20. *Overall, what is the biggest internal roadblock to permit issuance from the perspective of Resources and Internal Management Support?* The two biggest roadblocks are staff turnover and the inability to charge billable hour permitting fees for permit modification. The union contract no longer allows staff to transfer between positions in the Department, so we are hopeful that staff will stay in their current positions longer.

Environmental Justice Resources

21. *Do you have Environmental Justice (EJ) legislation, policy or general guidance which helps to direct permitting efforts? If so, may EPA obtain copies of appropriate documentation?* No, not at this time.

22. *Do you have an in-house EJ office or coordinator, charged with oversight of EJ related activities?* Yes, Catharine Fitzsimmons, Air Quality Bureau Chief, and Tamara MacIntosh, DNR General Counsel and Legal Services Bureau Chief.

23. *Have you provided EJ training / guidance to your permit writers?*

No, we have not provided specific training to the permit writers but have recently been discussing the topic to raise their awareness of EJ issues. We are closely following the EJ comments that Missouri DNR has been receiving. One of our staff attended a public training that Minnesota put on last year.

The Title V Supervisor has received some training on EJ issues and [EPA's EJSCREEN: Environmental Justice Screening and Mapping Tool](#) as part of her former position leading DNR's efforts to implement the Clean Power Plan and Clean Energy Incentive Program.

24. *Do the permit writers have access to demographic information necessary for EJ assessments?* (e.g., socio-economic status, minority populations, etc.) EPA's EJSCREEN tool is available to all permit writers, but they have not received training on the tool.

25. *When reviewing an initial or renewal application, is any screening for potential EJ issues performed? If so, please describe the process and/or attach guidance.* No, not at this time, but we acknowledge that screening for potential EJ issues will become more important in the future.

H. Title V Benefits

1. *Compared to the period before you began implementing the Title V program, does the Title V staff generally have a better understanding of:*
 - a. *NSPS requirements?*
 - b. *The stationary source requirements in the SIP?*
 - c. *The minor NSR program?*
 - d. *The major NSR/PSD program?*
 - e. *How to design monitoring terms to assure compliance?*
 - f. *How to write enforceable permit terms?*

Most of the current staff were not working in the air permitting program prior to implementing the Title V program, so we cannot speak to the situation before the Title V program was implemented. However, as described above in [Section A. Title V Permit Preparation and Content](#), our staff receive extensive training on NSPS, NSR, PSD, monitoring, and writing enforceable permit terms at the beginning of their employment in the Title V program. They also receive additional training throughout their career.

2. *Compared to the period before you began implementing the Title V program, do you have better/more complete information about:*
 - a. *Your source universe including additional sources previously unknown to you?*
 - b. *Your source operations (e.g., better technical understanding of source operations; more complete information about emission units and/or control devices; etc.)?*
 - c. *Your stationary source emissions inventory?*
 - d. *Applicability and more enforceable (clearer) permits?*

As mentioned above, most of the current staff were not working in the air permitting program prior to implementing the Title V program, so we cannot speak to the situation before the Title V program was implemented. However, we can say with certainty that the Air Quality Bureau has greatly improved its "source universe". In approximately 2000 - 2001, the Air Quality Bureau created a separate Emissions Inventory (EI) section. The EI staff maintain lists of both our minor and major sources of emissions inventories. Each year minor sources in one-third of the state are inventoried. This process starts with the Emission Inventory lead worker generating a list of all emission sources in that section of the state. The list is then narrowed down by removing sources that emit below or specific emission thresholds or belong to a certain nonpoint emission source category. The narrowed-down list is then reviewed by Compliance and Field Office staff to add any new facilities and remove any closed facilities.

Minor sources that are required to submit an inventory may use the State and Local Emissions Inventory System (SLEIS) to report their emissions, or they may submit on paper. All data submitted on paper is entered into SLEIS by the EI staff. The EI

staff then conducts reviews of inventories that show "outliers". EI staff is currently conducting QA/QC checks on minor source emission inventories that reported actual emissions in 2019 that are higher than the Title V applicability thresholds (7 facilities) or reported unusually high emissions for a minor source (18 facilities). Staff are also reviewing 8 sources that may show an elevated health risk for lead or HAPs in the National Air Toxics Assessment (NATA).

Major source facilities are required to report their actual emissions annually in SLEIS. The EI staff then conducts fee audits of facilities that report significant increases or decreases in their reported emissions from the previous year. This year, the EI staff has audited 35 facilities so far, resulting in corrections of 1,779 tons. The current reported total pollutants subject to fee is 80,289 tons.

3. *In issuing the Title V permits*

a. *Have you noted inconsistencies in how sources had previously been regulated (e.g., different emission limits or frequency of testing for similar units)? If yes, describe*

b. *Have you taken (or are you taking) steps to assure better regulatory consistency within source categories and/or between sources? If yes, describe.*

- The Title V staff works cooperatively with the Construction Permitting and Compliance sections to assure regulatory consistency between sources and within source categories in the following ways:
- Representatives from the Title V section attend each of the Construction Permitting and Compliance section meetings and vice versa. Notes from each meeting are taken and distributed to the Bureau (except for Compliance meetings which require confidentiality due to the nature of enforcement actions).
- Title V applications that have compliance or construction permitting issues are flagged as "priority" on the Title V data visualization board and construction permitting and compliance section regularly update the board with the status of the project. This board is a Trello Board, and is further discussed in [Good Practices not addressed elsewhere in this questionnaire](#).
- As part of the technical review process, the Title V permit writer sends out an [Information Request form](#) to the other sections. Staff in the other sections then fill out the Information Request form, noting if the facility is in/out of compliance, has current construction permit applications in house, is expected to submit construction permit applications in the future, has outstanding stack tests, etc.. An example of the [Information Request for facility 92-5221 Van Diest](#) is saved in the Iowa Title V Program Review Google Drive folder.
- If the Title V permit writer discovers a compliance or construction permitting issue during their technical review, they may fill out a [Work Request](#) and send it to the other sections. A copy of the Work Request form is also saved in the Iowa Title V Program Review Google Drive folder.
- When the construction permit engineers are working on a project, they check the Title V database to see if Title V is currently reviewing an application. If

so, the construction permit engineer provides draft copies of the construction permits for the Title V permit writer to look at before the construction permits are issued.

- Email notices are sent to a "Permits Notify" distribution list every time a construction permit or Title V permit is issued.
- The Title V Supervisor and Construction Permit Supervisor frequently meet to discuss permit consistency and other issues that may affect the other section's work.

4. *Based on your experience, estimate the frequency with which potential compliance problems were identified through the permit issuance process (never, occasionally, frequently, or often)?*
 - a. *prior to submitting an application - occasionally*
 - b. *prior to issuing a draft permit - frequently*
 - c. *after issuing a final permit - occasionally*
5. *Based on your experience with sources addressing compliance problems identified through the Title V permitting process, estimate the general rate of compliance with the following requirements prior to implementing Title V (never, occasionally, frequently, or often)?*
 - a. *NSPS requirements (including failure to identify an NSPS as applicable)?*
 - b. *SIP requirements?*
 - c. *Minor NSR requirements (including the requirement to obtain a permit)?*
 - d. *Major NSR/PSD requirements (including the requirement to obtain a permit)?*

As mentioned above, most of the current staff were not working in the air permitting program prior to implementing the Title V program, so we cannot speak to the situation before the Title V program was implemented.

6. *What changes in compliance behavior on the part of sources have you seen in response to Title V? (Check all that apply.)*
 - a. *increased use of self-audits? Frequently.*
 - b. *increased use of environmental management systems? Frequently.*
 - c. *increased staff devoted to environmental management? Frequently.*
 - d. *increased resources devoted to environmental control systems (e.g., maintenance of control equipment; installation of improved control devices; etc.)? Frequently.*
 - e. *increased resources devoted to compliance monitoring? Frequently.*
 - f. *better awareness of compliance obligations? Frequently.*
 - h. *Other? Describe.* The DNR and facilities have worked together over the years to improve permit requirements, provide clarification with frequently asked questions (FAQ) documents, standard procedures, and templates and forms to enhance information sharing.
7. *Have you noted a reduction in emissions due to the Title V program?*
 - a. *Did that lead to a change in the total fees collected either due to sources getting out of title V or improving their compliance?*

b. *Did that lead to a change in the fee rate (dollars/ton rate)?*

The total Title V emissions subject to fees decreased 33% from 2015 - 2019. Table 7 below shows the changes in tons and fees from 2015 - 2019. This reduction is not directly due to the Title V program, but is due to other factors affecting the regulated facilities such as the economy. A majority of the decrease has been in the electric power sector. This is due to other regulations affecting utilities (e.g. CSAPR) and Iowa utilities switching from coal to natural gas or wind, or shutting down. These shutdowns and fuel switching may be due to their facility's environmental plans or because of consent agreements with environmental organizations (e.g. Sierra Club).

Table 7: Title V Emissions Subject to Fees and Fee per Ton

Year	Tons Subject to Fees	Fee (\$/ton)
2015	119,819	67.50
2016	99,179	70.00
2017	98,350	70.00
2018	102,814	70.00
2019	94,014	70.00
2020	80,289	70.00

As discussed earlier, [Iowa Code 455B.133B](#) and our rules ([567 IAC 30](#)) cap the total revenue that the DNR can generate and the maximum Title V emissions fee per ton that we can charge, so the emissions fee has not changed since 2016.

8. *Has title V resulted in improved implementation of your air program in any of the following areas due to Title V:*

- a. *netting actions*
- b. *emission inventories*
- c. *past records management (e.g., lost permits)*
- d. *enforceability of PTE limits (e.g., consistent with guidance on enforceability of PTE limits such as the June 13, 1989 guidance)*
- e. *identifying source categories or types of emission units with pervasive or persistent compliance problems; etc.*
- f. *clarity and enforceability of NSR permit terms*
- g. *better documentation of the basis for applicable requirements (e.g., emission limit in NSR permit taken to avoid PSD; throughput limit taken to stay under MACT threshold)*
- h. *emissions trading programs*
- i. *emission caps*
- j. *other (describe)*

The Title V program has improved the implementation of our air program as the Title V permit writers perform a holistic review of all air emission requirements that a facility is subject to. In effect, the Title V permit review serves as a second look at the emission limits, monitoring, recordkeeping, and reporting set in the construction permits.

The close collaboration between the Title V section and the Construction Permits section has improved both permitting programs. When writing NSR permits, the construction permit engineers consider what additional monitoring may be required by Title V, especially CAM, and try to make the permits compatible. They also provide draft construction permits to the Title V section for review prior to issuance.

The compliance status of the facility is also reviewed in detail during the Title V review, and Title V permits are not issued to facilities that are out-of-compliance unless the facility has a DNR-approved compliance plan in place. Through this process we have not identified a pattern of noncompliance with any specific industry type; overall, compliance has been good. The ethanol industry has experienced recurring compliance issues with testing and monitoring, but those requirements are set first in the facility construction permits and not driven by the Title V permit.

Title V's use of a tabular format to group similar emission sources inspired the construction permitting section to develop two new consolidated permit types called the Group of Identical Air Permits (GIP) and the Collection of Air Permits (CAP). The GIP consolidates the permits for identical emission units into one document. The CAP consolidates the permitting requirements for similar units with identical limits, units with combined limits, units that are part of a single production line or units that have the same NESHAP or NSPS requirements into one CAP document. Each emission point receives a permit number. The first GIP was issued in April 2015 and the first CAP was issued in May 2016.

Title V emissions fees have also been used to implement and improve the air quality program. For example, these fees have been used to implement the State and Local Emissions Inventory System (SLEIS) for emissions inventory, to implement Iowa EASY Air, and to scan and upload nearly 4 million pages of air quality documents to the [DocDNA electronic records system](#).

9. *If yes to any of the above, would you care to share how this improvement came about? (E.g., increased training; outreach; targeted enforcement)?* Not applicable.

10. *Has Title V changed the way you conduct business?*

- a. *Are there aspects of the Title V program that you have extended to other program areas (e.g., require certification of accuracy and completeness for pre-construction permit applications and reports; increased records retention; inspection entry requirement language in NSR permits). If yes, describe.*
- b. *Have you made changes in how NSR permits are written and documented as a result of lessons learned in Title V (e.g., permit terms more clearly written; use of a statement of basis to document decision making)? If yes, describe.*

- c. *Do you work more closely with the sources? If yes, describe.*
- d. *Do you devote more resources to public involvement? If yes, describe.*
- e. *Do you use information from Title V to target inspections and/or enforcement?*
- f. *Other ways? If yes, describe.*

As described above, the Title V program has led to more involvement with stakeholders and permittees through workgroups, lean events, and one-on-one communication. The Title V program has also led to more collaboration between the sections within the AQB (Compliance, Emissions Inventory, Construction Permitting, Stack Testing, and Program Development) and with the field offices. We have learned to do more long-term planning and be proactive, not reactive, as we have strived to continuously improve the program.

11. *Has the Title V fee money been helpful in running the program? Have you been able to provide:*

- a. *better training?*
- b. *more resources for your staff such as CFRs and computers?*
- c. *better funding for travel to sources?*
- d. *stable funding despite fluctuations in funding for other state programs?*
- e. *incentives to hire and retain good staff?*
- f. *are there other benefits of the fee program? Describe.*

Title V emissions fee money has been critical in running the program. Staff have been able to receive adequate training, and the emissions fees have provided sufficient funds for equipment and program resources. It is unclear how the projected future declines in emissions will impact the program.

To help offset declining revenues from declining emissions, the Iowa General Assembly added Title V application fees in 2016. The application account in the Title V Fund (325C) had run a negative balance since its inception. However, the application account (Title V Operating Permit Fee (325C)) has a positive balance as of June 2021.

12. *Have you received positive feedback from citizens? We have, but can't provide examples of any specific feedback.*

13. *Has industry expressed a benefit of Title V? If so, describe.*

Industry has repeatedly expressed support for the state's implementation of the Title V program. AQB staff are frequently invited to speak at industry conference where participants voice their appreciation. Industry staff participating in AQB workgroups and lean events have also complimented the permit program. Some examples are:

"We certainly value having open dialogue with the Department, and we appreciate the fact that you and your colleagues regularly take the time and make the effort to not only bring your expertise to our members, but also to listen to and address our specific questions, feedback and concerns."

Grant Menke, Iowa Renewable Fuels Association, 2013

“My experience with the Iowa DNR permitting group in the past has been outstanding – actually one of the best states I have worked with. Customer service is excellent...In this event, I saw the same effort, sincere customer service and knowledge expressed throughout the meeting...”
Bruce Stainbrook, Altec, 2016

“The initial draft of the Operations Permit was still unwieldy. Jeremy Arndt consolidated the information from construction permits into an operating permit that is much more manageable, reducing the length by hundreds of pages.”
Jake Steil, Transco Railway Products, 2018

14. *Do you perceive other benefits as a result of the Title V program? If so, describe.*
The Title V program benefits the permittee, citizens, EPA, field office inspectors, and many others because it provides an all-encompassing look at all of the air pollution sources at a facility, as well as the requirements those sources are subject to. In addition, many facilities have not taken the time to understand/review the requirements in their construction permits until they have been incorporated into their Title V permits and have to certify compliance with the conditions.

Because Title V permit writers perform a holistic review of all air emission requirements, the Title V permit review serves as a second look at the emission limits, monitoring, recordkeeping, and reporting set in the construction permits and may add additional monitoring to protect ambient air quality standards and emission limits.

The Title V review may identify conflicts in language or limits among construction permits that have been issued over several years or decades. As part of the Title V review process, permit writers try to point these conflicts out to the facilities and suggest they request that their construction permit conditions be harmonized to be enforceable, clear, and help assure compliance.

Improved routine maintenance of control equipment is also driven by our periodic monitoring guidance rule and compliance assurance monitoring (CAM) requirements that are incorporated into the Title V permits.

15. *Other comments on the benefits of title V?*

Because we are in more frequent dialogue with facilities about all of their air pollution-emitting activities through the Title V program, we are better prepared to provide them with assistance on NSR permit modifications and large projects.

I. Good Practices not addressed elsewhere in this questionnaire

Are any of the practices employed that improve the quality of the permits, or other aspects of title V program that are not addressed elsewhere in this questionnaire?

Small Source Operating Permits

DNR offers [Small Source Operating Permits](#) to facilities whose potential emissions exceed the major source thresholds for Title V, but whose actual emissions are less than fifty percent of the major source thresholds for every 12-month rolling period. By registering for a Small Source Operating Permit, the owner agrees to limit plant-wide actual emissions of each regulated air pollutant to below fifty percent of the major source thresholds. Facilities eligible for a Small Source Operating Permit may also qualify for reduced record keeping requirements through classification as a "de minimus" emissions source as defined in 567 IAC 22.300(4). [A list](#) of the 70 facilities currently registered as small sources is saved in the Iowa Title V Program Review Google Drive folder.

Trello Data Visualization Board

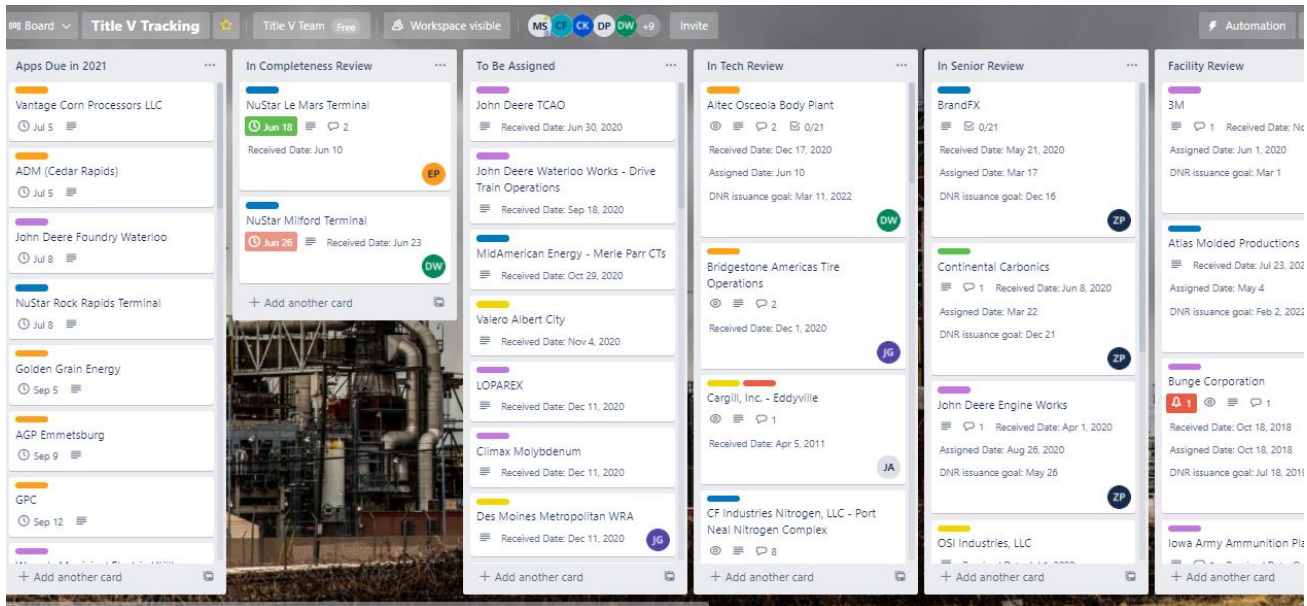
In 2021, Title V staff created a new [Trello data visualization board](#) to track Title V applications and due dates throughout the Title V permitting process. Staff historically used a Microsoft Access database for tracking, but the database requires a network connection to open it, and frequently throws errors if more than one person is working in the database at the same time. In addition, Polk and Linn County Title V staff are unable to open the database.

The new Trello board is easier to use and is web-based so it may be opened without a network connection. Each permit application is shown on the board on an individual "card". The cards are sorted into the following ten categories and are moved from category to category as the application moves through the process:

- Apps Due in 2021
- In Completeness Review
- To Be Assigned
- In Tech Review
- In Senior Review
- Facility Review
- Public Notice
- Priority for Construction or Compliance
- Issued
- Not Operating or Hold

Cards are labeled with the type of application (e.g. Initial, Renewal 1, Renewal 2, etc.) and the permit writer assigned to the application. Cards also contain the application due date, received date, assigned date, DNR issuance goal date, and issued date. The Bureau Chief, local program staff, and Compliance and Construction Permitting section

staff have access to the board. A screenshot of the board is shown below. David Peter at EPA Region 7 was sent an invitation to access the board.



J. EPA assistance not addressed elsewhere in this questionnaire

Is there anything else EPA can do to help your title V program?

Not at this time. We appreciate the friendly, transparent, collaborative relationship we have with the staff in the EPA Region 7 office. We feel comfortable contacting R7 staff with questions and requests for assistance. David Peter is very fair in his review of our draft permits and is open to discussion on topics we disagree on, and the monthly permitting calls between Iowa DNR and EPA R7 are very helpful.



Date

Director

Library Name

Library Address

Library Address

Dear Director:

Enclosed is a copy of the Public Notice for Facility Name located in Facility City, Iowa. The permit deals with air emissions and emission limits for the facility.

I am requesting that you keep the Public Notice in an area that the public can either view it, such as the circulation desk, or request to view it. The documents should be available to the public from Pub. Notice Start Date Pub. Notice End Date. At the end of the viewing period, you may dispose of the document as you see fit. Thank you.

If you have any questions concerning the permit please contact me at (515) 725-####.

Sincerely,

Peter, David
Environmental Specialist
Air Operating Permits Section

Enclosures: Public Notice

Title V Permit Review Checksheet

New Part 2

The purpose of this checksheet is to guide the Title V permit writer through the numerous steps involved in issuing a Title V permit. It should be used for each application reviewed. For a more detailed discussion of each of these steps, see the Title V Permit Review Manual.

Facility Name: _____
 EIQ #: _____
 Facility #: _____

I. APPLICATION COMPLETENESS REVIEW

- A. Confirm the completeness review was finalized.

II. APPLICATION REVIEW

The application will be assigned to you for technical review by a supervisor or a senior through EASYAir and you will receive an email notification. Enter the date the project was assigned to you in the access database.

- A. Title V request for information. (Complete the Title V Facility Info Request form and send it to dnr_aqb_tv_info_request@dnr.iowa.gov .)
Enter the date you send the info request in both EASYAir and access.
- B. Send facility notification that we intend to begin reviewing their application, cc field office.
Enter the date you start the technical review in both EASYAir and access.
- C. Schedule outreach visit to discuss application and tour facility (optional)
- D. Inform field office via phone or e-mail about outreach visit
- E. Review entire construction file and the rescission database
- F. Confirm Title V Applicability
 - 1. Check PTE calculations - is it a major source (100 tpy, 10/25 tpy)?
 - a. acceptable assumptions?
 - b. acceptable emission factors?
 - c. acceptable control efficiencies?
 - d. acceptable math?
- G. Check for any other basis for claiming Title V applicability
 - 1. affected source under Title IV?
 - 2. subject to NSPS?
 - 3. subject to NESHAP (Parts 61 & 63)?
 - 4. solid waste incinerator subject to section 129(e) of the Act?
- H. Confirm "insignificant activities" meet requirements specified in 567 IAC 22.103
- I. Review Actual Emissions calculations from most recent emissions inventory as it relates to an evaluation of Periodic Monitoring.
 - 1. Acceptable assumptions?
 - 2. Acceptable emission factors?
 - 3. Acceptable control efficiencies?
 - 4. Acceptable math?
- J. Review the most recent inventory audit for any recurring problems with actual emissions calculations. (It is possible the facility has not been audited. See manual for links to audit database and folders.)
- K. Review Applicable Requirements (Part 2 of application)
 - 1. Review requirements (General Facility Requirements Form) for claimed applicability of various air programs and confirm that all are identified

- a. NSPS
- b. NESHAP - Part 61
- c. NESHAP - Part 63
- d. Acid Rain/CSAPR
- e. Stratospheric Ozone
- f. CAM
- 2. Check applicable requirements claimed by applicant against existing construction permits (for those sources that have permits)
 - a. Confirm all construction permits are identified & requirements included
 - b. Confirm that construction permit emission limits are federally enforceable (enforceable “as a practical matter”, i.e. is there recordkeeping to support the limit)
 - c. Confirm any outstanding stack test requirements
- 3. Check applicable requirements claimed by an applicant against the staff judgment of requirements for grandfathered / unpermitted / exempted sources (does not have a construction permit)
 - a. Particulate Matter - 23.3(2)
 - b. Fugitive Dust - 23.3(2)"c"
 - c. Visible Emissions - 23.3(2)"d"
 - d. SO₂ - 23.3(3)
 - e. Specific Processes - 23.4
 - f. Provisions of any existing court orders, administrative orders
- 4. Confirm source has all necessary construction permits, meets an exemption, are grandfathered or not generally permitted (indoor vented source) and verify all exemptions from construction permitting
- L. Review Compliance Status
 - 1. Confirm that facility is “in compliance” if applicant claims to be on Emission Point Information Forms
 - a. Check records for variances from applicable rules (567 IAC 21.2)
 - 2. Confirm that facility is “on schedule” if non-compliance is claimed and a compliance schedule is provided
 - 3. Review compliance schedule for acceptability (is it timely?)
 - 4. If necessary, complete Title V Facility Work Request form and discuss any compliance issues and schedules with Compliance Unit.
 - 5. Review most recent field office inspection report
- M. Review Proposed Limits, if any have been included
 - 1. Check calculations for acceptable assumptions, math, etc.
 - 2. Confirm that proposed limits would constitute “Federally Enforceable Permit Limits”
- N. Review Periodic Monitoring/CAM Proposals (evaluate according to Periodic Monitoring Guidance and acceptable CAM plans)
 - 1. Confirm monitoring has been proposed for all sources meeting the criteria
 - 2. Confirm acceptability of proposed monitoring
 - 3. Develop draft monitoring for those affected sources for which none was proposed or which was determined to be unacceptable
- O. Send outreach follow-up letter via certified mail with request for any additional information (If a site visit was done.)
Deadline date for response: _____
- P. Update tracking information in Title V database including all information requests to the facility

III. DRAFT TITLE V OPERATING PERMIT

See review manual for guidance on what to look for in draft construction permits sent for review by the construction permitting section.

- A. Incorporate all “generally applicable requirements” into draft permit
- B. Incorporate all source specific applicable requirements into draft permit
- C. Incorporate approved “proposed limits” (if any) for specific sources into draft
- D. Incorporate approved compliance schedule (if any) into draft permit
- E. Incorporate periodic monitoring & CAM conditions for those sources meeting criteria
- F. Confirm, after federal deadline of June 20, 1999, that sources subject to Risk Management Plans - Sec. 112(r), have submitted their plan to EPA (See Chris for confirmation, as he is an EPA authorized recipient of this information.)
- G. Attach and cross-reference any necessary appendices (i.e. Acid Rain Permit, consent orders, NESHAPs (web links), etc.)
- H. Incorporate any “state only” or “local only” limitations or requirements and identify them as such
- I. For renewal applications, review semi-annual monitoring reports & annual compliance certifications submitted during past permit term
- J. Prepare Fact Sheet, Permit Writer's Notes & Spreadsheets that discuss the review decisions
- K. Give the Draft Permit, Fact Sheet, & Permit Writer's Notes to your senior for review prior to sending the documents to the facility. Once a senior has reviewed the documents, make any necessary corrections prior to sending the information to the facility.
The senior will enter the date they complete their review into EASYAir.
- L. Send Draft Permit, Fact Sheet, & Permit Writer's Notes to responsible official and plant contact (7/15-day informal facility review period)
Deadline Date for Response: _____
Enter the date you send the draft permit to the facility in both EASYAir and access.
- M. Schedule outreach visit during facility review period if the facility wishes to discuss draft permit (notify field office if the visit is to take place at the facility)
- N. Update tracking information in Title V database including all information requests to the facility
- O. Confirm with compliance that there are no current compliance actions with the facility prior to proceeding to the public notice phase.

IV. PUBLIC NOTICE INTENT TO ISSUE TITLE V PERMIT

- A. If comments are received during facility review period, make any necessary changes to permit documents
- B. Send draft permit to & solicit comments from:
 - 1. EPA (via e-mail) - public notice, fact sheet, permit writer's notes, spreadsheets and draft permit (45-day EPA review begins when public comment starts)
Date 45-day EPA review period ends: _____
 - 2. Post on AQB's web site – (Monday before the notice date.) (30-day public comment period starts when published (Thursday))
 - a. E-mail Jason Dowie (web master) and CC: Brad (backup Brad Ashton) PDF's of public notice, fact sheet (with permit writer notes attached), and draft permit. Also include the text for the web master to send to the EcoNewsWire contacts.
 - b. Don will email the EcoNewsWire contacts the information for posting on Tuesday with the subject line "AQ Permits for EcoNewsWire on ##.##.#### of Eco"
Contacts: Primary Jessie.Brown@dnr.iowa.gov and CC: Karen.Grimes@dnr.iowa.gov and Alex.Murphy@dnr.iowa.gov
 - c. Date public comment period begins: _____
 - d. Date public comment period ends: _____

- e. Print a copy of the Title V draft webpage on the first day of the public notice. Ensure there is a date stamp on the printed page. *A suggestion is to print this to a pdf to maintain a copy with electronic permitting documents on our network drives.*
 - 3. Post in local library -
 - a. Send via first class mail – Cover letter and public notice
 - 4. Facility -
 - a. Mail via first class to responsible official & permit contact (may e-mail) - public notice, fact sheet, permit writer's notes, spreadsheets and draft permit
 - 5. Surrounding states – E-mail public notice (if applicable)
 - 6. Affected local programs (Omaha) - Mail public notice (if applicable)
 - 7. Field Office – E-mail public notice, fact sheet, permit writer's notes, spreadsheets and draft permit
 - 8. E-mail public notice to persons who have requested to be on a mailing list
- C. Update tracking information in Title V database
Enter the starting date of the public notice in both EASYAir and access.
 - D. Schedule outreach visit during public comment period if the facility wishes to discuss draft permit (notify field office if the visit is to take place at the facility) (optional)
 - E. If a public hearing is held, e-mail the required information to be posted on the State Public Meeting Calendar
- V. ISSUE TITLE V PERMIT
- A. If comments were received during the public comment/EPA review period:
 - 1. Develop Responsiveness Summary
 - 2. Make necessary changes to permit documents
 - 3. Send a copy of the revised documents to EPA, all commenters, field office and facility.
 - B. Before issuing final permit, confirm with EPA that it is acceptable to do so. If EPA requests it, give additional 45-days for their review of the proposed permit.
 - C. Remove "DRAFT" or "Proposed" from permit, get permit number, add dates for permit, change dates of stack tests to correspond with permit dates, and get signature
 - D. Mail final permit, permit writer's notes, spreadsheets (if necessary) and responsiveness summary (if one was created) to the following:
 - 1. Facility - responsible official (via certified mail) & permit contact (may e-mail)
 - 2. EPA (via e-mail)
 - 3. Field Office (via e-mail)
 - 4. All commenters (via e-mail)
 - E. Send e-mail notification with a completed form regarding permit issuance to "TV Permits Notify" group in Google Mail using template (see manual). Enter the date you send the permits notify email into EASYAir.
 - F. Copy all electronic files associated with permit review including e-mails to:
[\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Operating Permits\final.tv\\[last 4 digits of eiq#\]](\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Operating Permits\final.tv\[last 4 digits of eiq#])
 - G. E-mail Jason Dowie (backup Brad Ashton) a PDF of the final permit for posting on AQB's web site
 - H. Update tracking information in Title V database including hyperlink to permit, update or enter the permit number and enter stack tests in the stack test database. Enter the issuance date and permit duration dates in EASYAir.
 - I. Schedule outreach visit if the facility wishes to discuss the final permit (notify field office if the visit is to take place at the facility) (optional)
 - J. Bind permit and include the following (start a new binder for renewed permits):
 - a. final permit

- b. review check sheet
- c. fact sheet
- d. public notice with proof of publication (print out of webpage)
- e. responsiveness summary (if one was created)
- f. permit writer's notes & spreadsheets
- g. correspondence

K. Upload a PDF version of the Title V permit and permit writer notes to EASYAir

VI. CLEAN-UP TITLE V RECORDS

Once you have completed the file cleanup process enter the date into EASYAir.

- A. Stage records for long-term storage using the record file cleanup procedure for Title V.(see manual)
- B. Recycle extra copies of emissions inventories and applications (there should only be one copy of each)

Record file cleanup procedure for Title V, Con 10-1-5 documents. **Con 10-1-5** documents consist of Emission Inventory, Fee and Miscellaneous Documentation. Records that are older than 15 years old may be recycled. The exception will be critical correspondence that is important to the permitting history of a facility. See the TM section below for more detail.

Recycle duplicate copies of documents in the file.

EI & FD - Emission inventory (EI folder) and fee (FD folder) documents

- Stage anything with a date more than 5 years prior to the previous December 1st. (For 2007 this would be anything older than December 1st, 2002.)
- Group all documents or packets together that meet the Con 10-1-5 record series definition. They should be separated into a stack of EI documents and FD documents.
- Attach a "Title V State Record Center coversheet" to the FD stack and EI stack. Code them for the Con 10-1-5 record series and the appropriate document code. (Check the Public or Confidential check box)
- Give the documents for archiving to the Records Center.

TM - Miscellaneous Documents (These documents will remain in records)

- Remove the critical correspondence from the previous Title V permit and place it in the TM (Misc.) records folder. Critical correspondence would include one-source determinations, Title V applicability and NSPS or NESHAP determinations. General correspondence that is older than 15 years old may be recycled. This would include form letters such as the EIQ reminder letter, mass mailings from the Department, renewal reminder letters and non-critical correspondence.

If any of the documents above have been granted confidentiality they must be kept separate from the public record documents.

Packet = collection of individual document of similar coding.

Bundle = all packets and loose documents of similar coding that is stage to be sent to the State Records Center (SRC) in a single box.

Based on the example above the process cut-off date on the "Title V State Record Center Cover Page" should be December 1st, 2002.

Record file cleanup procedure for Title V, **Con 10-1-4** documents. **Con 10-1-4** documents consist of Title V applications and permit packets

- Recycle duplicate copies of documents in the file.

TA - Applications

- Stage all application submittals received prior to the renewal application to be sent to the State Records Center.
- Group all applications that meet the **Con 10-1-4** record series definition.
- Attach a "Title V State Records Center coversheet" to the bundle and code it for the **Con 10-1-4** record series and the **TA** document code. (Check the Public or Confidential check box) **Use the date stamp for the renewal application as the cutoff date for the TA documents.**

PP - Title V Permits

- Remove critical correspondence from the previous Title V permit and place it in the TM file. See Con 10-1-5 instructions above for the correspondence.
- Confirm that a copy of the permit writer notes exists in the appropriate N:drive folder on the network.
- Attach a "Title V State Records Center coversheet" to the permit packet. Label it for the **Con 10-1-4** record series and **PP** document code. (Check the Public or Confidential check box) **Use the date stamp for the renewal application as the cutoff date for the PP documents.**

Title V permit packet contents in order.

- All signed Title V permit cover pages
 - Most recent version of the previous Title V permit
 - Review check sheet
 - Fact sheet
 - Public notice with proof of publication
 - Responsiveness summary (if one was created)
 - Permit writer's notes & spreadsheets
 - Correspondence
- Stage permit packet to be sent to the State Records Center by giving the documents for archiving to records staff in the Records Center.

If any of the documents above have been granted **confidentiality** they must be kept separate from the public record documents.

Packet = collection of individual document of similar coding.

Bundle = all packets and loose documents of similar coding that is staged to be sent to the State Records Center (SRC) in a single box.

Tips & Hints for AQ Permit Listings Template

1. Provide to Communications by the day before EcoNews goes out – usually on a Thursday

- a. Send to Jessie Brown at Jessie.Brown@dnr.iowa.gov, primary editor
- b. cc Karen Grimes and Alex Murphy, backup editors
- c. Ideally, all projects would come in in one document. Is that possible? I could combine them, or is there someone else in AQ who could or would do that each week? If so, that would be the first step. If we go that route, it would be helpful to save the file as date_AQpermits_ECO. Date would be two-digit month, two-digit day, two-digit year, e.g., 04.20.18.

2. Use the Subject Line: _____ (whatever Chris designated, I think it was *AQ Permits for EcoNewsWire on DATE of Eco*)

3. Please use Associated Press Style* for addresses, months and time.

a. Dates: When used with a specific date, abbreviate months Jan., Feb., Aug., Sept., Oct., Nov., and Dec., e.g., *Jan. 2*. Use the numeral for a date, e.g., *Sept. 10* not *Sept. 10th*. I don't think we need the year, unless the start time of the comment period ends in one year and the end time is in another.

b. Time: Use colon to separate hour and minutes, e.g., *11:30*; but do not need minutes when referring just to the hour, e.g., *11 a.m.* Use lower case for a.m. and p.m.

c. Addresses:

1. List the County where facility is located.
2. Use abbreviations *Ave.*, *Bldv.* and *St.* with a numbered address. Spell out *alley*, *drive* and *road*.
3. Always use a figure for an address number, e.g., *9 Morningside Circle*.
4. Spell out *First* through *Ninth* when part of a street name; use figures for 10th and above, e.g., *122 First St.*, *103 22nd St.*
5. Abbreviate compass points: *222 E. Campus Drive* or *143 Green St. N.W.*
6. I don't think we need the state or zip code.

4. Descriptions: Keep it short and sweet. For media and for interested people, the key will most likely be the location of the project. If they are interested, they will go to the link and look at the project. For some, it will be the name of the facility. Again, if they are interested in all the projects one company has, they will go to the link for more information.

5. Paste project description into the appropriate template, Title V or PSD permits.

* A really old, 1987, dark blue Associated Press Stylebook is located in the wire rack on the left side of my cubicle. Feel free to use it.

TITLE V REVIEW MANUAL

New Part 2

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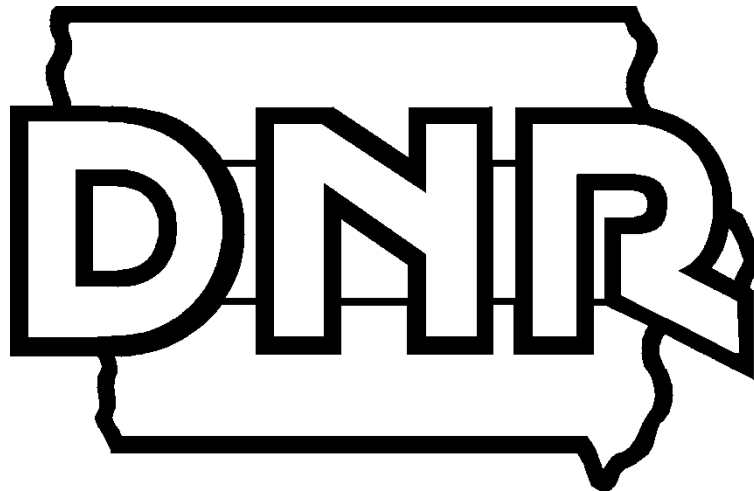
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Iowa DNR - Air Quality Bureau

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INTRODUCTION

The purpose of the Title V Review Manual is to serve as a supplement to the Title V Permit Review Checksheet. The review manual discusses each permitting step in detail, and gives locations of important documents and reference materials. The Title V review process involves complex issues and a teamwork approach is encouraged.

I. APPLICATION COMPLETENESS REVIEW

The application will be assigned to you for completeness review by a supervisor or a senior through EASYAir and you will receive an email notification. Enter the date the completeness review was assigned to you in the access database.

- A. **Confirm that correct forms were used, all applicable forms submitted, key fields completed, etc.**

This should be completed within 60 days of receipt of the application, otherwise the application will automatically be deemed complete [22.107(1)"d"]. The completeness review should be done using the Completeness Review Checklist ([N:\DNR Shared Perm\Templates\AQ\Operating Permits\Permit\Completeness Review Checksheet2018new.dotx](#)). The Completeness Review Checklist is used to ensure that all the appropriate forms have been submitted, and that all necessary information has been provided. This does not mean the information is accurate, only that the facility has provided a value. After finishing the Completeness Review, a copy of the Completeness Review Checklist should be placed in the Title V file, along with the record copy of the application.

- B. **Send facility completeness determination letter**

Work with your lead worker to determine whether the application is incomplete.

If the application is deemed incomplete (i.e. there are any missing or incomplete forms):

- Establish a deadline by which the supplemental information must be submitted (usually 2 weeks).
- Call the facility contact, and discuss why the application is incomplete.
- Send a certified letter to the responsible official (copy the facility contact) requesting the supplemental information.

If the application is deemed complete:

- Send the facility a form letter confirming that the application has been received, and deemed administratively complete.

Form letters for completeness determinations are available in one of the review category folders at: [\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Operating Permits\Correspondence\Completeness Reviews\](#)

- C. **Save a copy of the completeness determination letter to the appropriate category folder:**

\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Operating
Permits\Correspondence\Completeness Reviews\

II. APPLICATION REVIEW

The application will be assigned to you for technical review by a supervisor or a senior through EASYAir and you will receive an email notification. Enter the date the project was assigned to you in the access database.

- A. Title V request for information. (Complete the Title V Facility Info Request form and send it to dnr_aqb_tv_info_request@dnr.iowa.gov.)**

Enter the date you send the info request in both EASYAir and access.

- B. Send facility notification that we intend to begin reviewing their application, cc field office**

Enter the date you start the technical review in both EASYAir and access.

The permit writer usually sends this notice to the facility after the application has been assigned to a permit writer. The letters are located in the appropriate category folder at [\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Operating Permits\Correspondence\30day_renewals\](file:///I:/iowa.gov.state.ia.us/data/DNR_AQ_Shared/Operating%20Permits/Correspondence/30day_renewals/)

- C. Schedule outreach visit to discuss application and tour facility (optional)**

An outreach visit to the facility may be scheduled after the permit writer has had time to complete an initial review of the application (normally within 30-60 days after sending the notification letter). Enough time should be allowed to do a detailed review prior to the outreach visit. During the outreach visit, the permit writer will point out any deficiencies in the application, ask any relevant questions concerning the application, observe the emission sources and control equipment, and answer any questions the facility might have. The permit writer will pay particular attention to incidents of noncompliance and maintenance, or lack of maintenance to control equipment. Attention should also be given to emission sources not included in the application. A camera is available to take with you on outreach visits if you wish to document some of the equipment for your review notes.

- D. Inform field office via phone or e-mail about outreach visit**

The field office that covers the area the facility is located in should be informed of the date and time of the outreach visit. This allows field office personnel to schedule time to attend if they wish, and prevents them from scheduling an inspection on the same day. Contact the appropriate field office supervisor and environmental specialist senior (ESS) listed below. See Appendix B for a list of counties and the corresponding Field Office if you need to confirm which Field Office to contact.

- FO1 (Manchester): Supervisor -- Joe Sanfilippo, ESS -- Clark Ott
- FO2 (Mason City): Supervisor -- Jeff Vansteenburgh, ESS -- Glenn Carper
- FO3 (Spencer): Supervisor -- Ken Hessenius, ESS -- Cindy Martens
- FO4 (Atlantic): Supervisor -- Jessica Montana, ESS -- Holly Vandemark
- FO5 (Des Moines): Supervisor -- Ted Petersen, ESS -- Bill Gross
- FO6 (Washington): Supervisor -- Deb Quade, ESS -- Kurt Levetzow

- E. Obtain copies of all construction permits and review entire construction file**

Check out all construction and Title V files from records (This may include SPARS and DocDNA electronic records). Documents should be kept in chronological order. Older permits and documents may only be available on microfiche or roll film. See records steward for instructions on viewing microfiche or roll film.

SPARS applications may be printed to a PDF file format to make the review easier. Emissions data for actual and potentials emissions maybe exported from SPARS by using the instructions located: <N:\DNR Shared Perm\Templates\AQ\Operating Permits\Instructions for using the SPARS Reports.docx>

The DocDNA system is available through the internet, and the link to the webpage is posted on the AQB's intranet site.

Electronic copies of construction permits may be available in the following locations:

1. \\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Con-Perm\con_perm_FINAL (where current construction permits are placed after they are posted on AQB's webpage)
2. \\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Con-Perm\final 2 (where current construction permits are placed before they are posted on AQB's webpage; permits are removed from this location after they are posted on the web)
3. \\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Con-Perm\tiff images not on web (tiff images of older construction permits can sometimes be found here)
4. AQB Webpage (pdf's available at <http://www.iowadnr.gov/InsideDNR/RegulatoryAir/ConstructionPermits/PermitSearch.aspx>)

When there is a discrepancy between the electronic version of a permit and the signed paper copy of a permit, the signed paper copy is the enforceable document. The status of current construction projects can be searched via SPARS on AQB's webpage. Also, the Title V database has information on completed construction permit projects since 2001 (Form - "Construction Projects for TV Sources"). When a permit cannot be found in-house, it may be necessary to ask the appropriate Field Office if they have a copy. If all else fails, ask the facility for a copy.

F. Confirm Title V Applicability

Facilities are considered a major source under Title V if their potential emissions exceed 100 tpy (tons per year) of any criteria pollutant or 10 tpy of any single HAP (hazardous air pollutant) or 25 tpy of any combination of HAPs. There were 189 listed hazardous air pollutants in the Clean Air Act Amendments of 1990. Caprolactum and methyl ethyl ketone (MEK) were removed from the list leaving 187 HAPs. For a current listing of HAPs see Title V application instructions. (\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Operating Permits\Foms\Instructions\ Instructions_T5_Rev1-16.doc), Appendix A: Table A-1/A-2, or the definition of "hazardous air pollutant" found in 22.100. Facilities with potential emissions less than the major source thresholds may also be required to obtain a Title V permit for the reasons outlined in section II. G.

1. Check PTE calculations - is it a major source (100 tpy, 10/25 tpy)?

Read the definition of "potential to emit" (PTE) found in 22.100. PTE is one of the most commonly misunderstood and debated terms in air quality permitting.

In general, PTE for a given pollutant should be estimated as follows:

1. if applicable, use construction permit limits or an applicable emission standard from state or federal rules;
2. if no applicable limit or standard exists, approved stack test data, mass balance, EPA

approved emission factors, engineering judgement, etc. are normally used and based on 8760 hours of operation per year (note: the above is listed in order of preference).

One main exception to the above is if the unit is physically not capable of emitting anywhere near its limit or standard. For example, AP-42 emission factors may be used for a natural gas-fired unit where the only emissions are from the products of combustion, and the unit is only subject to the general emission limits from Chapter 23 of the Iowa Administrative Code (IAC). Emission factors can be used in this instance because they are highly rated, and because the maximum capacity of this type of unit to emit particulate matter and SO₂ do not come anywhere near the general particulate matter and SO₂ standards (0.1 gr/scf, 0.6 lb/MMBtu, 500 ppmv).

Examples of calculating PTE may be found in the document named "Potential and Allowable Emissions Calculations" (\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Operating Permits\Reference Documents\Calculation Documents\POT-ALLW.docx).

a. acceptable assumptions?

Do the assumptions made in the emissions calculations appear to be reasonable? The phrase "based on engineering judgment" needs to be qualified and quantified. The statement should be explained on Form CA-01 using valid information such as stack tests on similar equipment, a mass balance, or reasonable assumptions based on information published by EPA or a recognized trade publication. Material from trade publications will require more scrutiny than information provided by EPA.

b. acceptable emission factors?

Are the emission factors from an accepted published source? Examples of such sources would be EPA's WebFIRE, AP-42, or source specific EPA reports (<http://www.epa.gov/ttn/chief/efpac/index.html>). If a mass balance has been done for VOC/HAPs in a material such as paint, the material safety data sheet (MSDS) or certified product data sheet (CPDS) for the paint should be checked. Checking the MSDS or CPDS is also useful for verifying what is in the raw materials going into a process.

Note: Emission factors based on stack test data will be after-control emission factors. Check the calculations presented on Form CA-01 to make sure the control efficiency has not been applied to the emissions shown on Forms 3.0 or 4.0. If you need to calculate the 95% confidence interval of a stack test see the 95percent.xls file located on the n: drive (\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Operating Permits\Forms\Spreadsheets\95percent 2 through 6 runs.xls).

c. acceptable control efficiencies?

Note: If the point has no construction permit, associated control equipment may not be used to estimate potential emissions.

Compare the control efficiencies claimed with the values in the "Iowa Title V Operating Permit Control Efficiency Table" (\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Operating Permits\Reference Documents\Guidance\ControlEfficiency.doc). Facilities may use control efficiencies higher than those found in the table if they have supporting data. Vendor

guarantees are not acceptable. Stack test data documenting the efficiency of the control equipment at the facility or similar equipment at another facility is acceptable. Similar equipment means the operating conditions are close to the same and the pollutant being controlled is the same. The stack test must have been performed using Iowa specific or EPA methods, and observed by a state or federal agency.

d. **acceptable math?**

Assumptions made in calculating emissions should be documented on CA-01 forms. Do the calculations make sense?

G. **Check for any other basis for claiming Title V applicability**

Facilities with potentials emissions less than the major source thresholds may also be subject to Title V for the reasons outlined below.

1. **affected source under Title IV?**

Facilities subject to Title IV (Acid Rain) are subject to Title V even if their potential emissions are not above the major source thresholds. Electric utilities are the primary sources affected by Title IV. Some backup generators that act as a substitute for power from the grid may be subject to Acid Rain requirements. If the unit has a "New Unit Exemption", it is not subject to Title V unless the potential emissions are greater than the major source thresholds. Units that have a nameplate rating under 25 MW/hr and burn fuel with 0.05% sulfur or less by weight may qualify for the exemption. Contact Chris Kj. with questions or visit EPA's Acid Rain web site (<http://www.epa.gov/airmarkets/index.html>).

2. **subject to NSPS?**

Title V application General Facility Requirements Form should list any New Source Performance Standards (NSPS) that a facility is subject to.

Sources subject to an NSPS are subject to Title V permitting requirements [22.101(1)"c"]. However, if the facility is a minor source (potential emissions below the major source thresholds) and the NSPS does not directly state that a Title V permit is required, they have been permanently deferred [22.101(2)]. For those minor sources required to get a permit by the NSPS the source would be required to have a Title V permit covering only the unit(s) subject to the NSPS.

New Source Performance Standards in general, cover industrial source types and specific processes. Check the construction/modification dates for the emission unit to see if it is subject to a specific NSPS. If a modification did not produce an increase in emissions of a regulated air pollutant, it may not be covered under a specific NSPS [40 CFR 60.14(a)].

3. **subject to NESHAP (Parts 61 & 63)?**

Title V application General Facility Requirements Form should list any National Emission Standard for Hazardous Air Pollutants (NESHAPs) that a facility might be subject to.

Sources subject to NESHAPs are subject to Title V permitting requirements [22.101(1)"c"]. However, if the facility is a minor source (potential emissions below the major source thresholds) and the NESHAP does not directly state that a Title V permit is required, they are permanently deferred [22.101(2)]. EPA action ending the deferral, would require a Title V permit covering only the unit(s) subject to the NESHAP.

In general, Part 63 NESHAPs cover industrial source types and Part 61 NESHAPs cover specific hazardous air pollutants. For more information on completed and upcoming NESHAPs, visit EPA's Air Toxics web site (<http://www.epa.gov/ttn/atw/eparules.html>).

4. solid waste incinerator subject to section 129(e) of the Act?

Solid waste incinerators subject to section 129(e) of the Act are subject to Title V permitting requirements. Currently, municipal waste combustors and medical waste incinerators are the only source categories subject to these regulations. For more information, visit the EPA's Air Toxics web site.

H. Confirm "insignificant activities" meet requirements specified in 567 IAC 22.103

Insignificant activities must meet the requirements specified in rule 22.103. Subrule 22.103(1) lists activities that do not need to be included in the application. Subrule 22.103(2) lists insignificant activities that do need to be included in the application.

I. Review Actual Emissions calculations from most recent emissions inventory as it relates to an evaluation of Periodic Monitoring.

Review the emissions inventory for the most recent year available. Check for gross variations in total emissions from year to year as an indication of changes in operation. Should this increase or decrease cause additional scrutiny during the evaluation of Periodic Monitoring? This is not intended to be a detailed audit the inventory by the Title V staff. Significant errors in the emissions data should be referred to the emission inventory section for an audit.

In general, the preferred method of estimating actual emissions is as follows (listed in order of preference): CEMs data, stack test data, mass balance, EPA approved emission factors, engineering judgement, etc.

Things to keep in mind:

- If actual emissions are close to the PTE more monitoring may be warranted. If actual emissions are over the PTE this may indicate a violation.
- Emissions reductions due to control equipment may be used to estimate actual emissions, whether the equipment has a construction permit or not.
- Information that is more detailed may be needed to verify the values reported. Sometimes the original application will have this information (i.e. MSDS).
- As mentioned previously, if the control efficiency is higher than the value shown in the Iowa Title V Operating Permit Control Efficiency Table, it must be documented.
- If the facility has under-reported or over-reported emissions, we will evaluate what action to take on a case-by-case basis. This may trigger an audit by the emissions inventory section.

1. Acceptable assumptions?

2. Acceptable emission factors?

- 3. Acceptable control efficiencies?
- 4. Acceptable math?
- J. Review the most recent inventory audit for any recurring problems with actual emissions calculations. (It is possible the facility has not been audited. See links below to audit database and folders.)

- Emissions inventory Title V audit tracking database:
\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\AQBureau\Database\Emissions Inventory\Title V Inventory Review Database.accdb
- Title V Fee Audit reports: \\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Emissions Inventory\Title V Fee Audits
- Title V Inventory reviews - reports:
\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Emissions Inventory\Title V Reviews

K. Review Applicable Requirements (General Facility Requirements Form)

- 1. Check requirements review forms (General Facility Requirements) for claimed applicability of various air programs, and confirm that all are identified

Has the facility checked the appropriate boxes on the General Facility Requirements form for the type of operations that exist at the facility? What type of facility is it? What types of pollutants are emitted? When were the emission units constructed or last modified?

- a. NSPS
- b. NESHAP - Part 61
- c. NESHAP - Part 63
- d. Acid Rain/CSAPR
- e. Stratospheric Ozone

The State of Iowa does not have the authority to enforce the stratospheric ozone rules. However, we do ask facilities to identify if they are subject to this rule. Applicability is triggered by the use or manufacture of chlorofluorocarbons (CFCs). This is normally the use of CFCs in refrigeration and air conditioning systems, including vehicle maintenance done on site. The General Conditions of the Title V permit will list the basic requirements for sources subject to this rule.

- f. CAM

The Compliance Assurance Monitoring (CAM) rule is found in 40 CFR 64 (promulgated 10/22/97). Only units with control equipment and an enforceable emission limitation or standard are potentially subject to this rule. Most units will not be required to submit a CAM plan until their permit is renewed. Examples of approved CAM plans may be found at \\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Operating Permits\Reference Documents\CAM

- 2. Check applicable requirements (Emission Point Information Forms) claimed by applicant against existing construction permits (for those sources that have permits)

When reviewing applicable requirements for an emission point, first look at the pollutant. Does it have an applicable requirement? Next, consider what type of facility the application covers. Are there any state or federal regulations that specifically cover this type of facility or a specific operation? Does this point have a construction permit limit for a specific pollutant? What applicable requirements have been referenced in the construction permit?

Depending on when the construction permit was written, you may see the following citations from older versions of our rules: 400 IAC 4.3(2)"a" or 900 IAC 23.3(2)"a". The current citation of the above rule is 567 IAC 23.3(2)"a".

a. Confirm all construction permits are identified & requirements included

If the facility did not identify the construction permit for the emission point in the application (Form 3.0 or Emission Point Information Forms), it may be possible to match the point and permit by looking at the construction permit and emission unit description. If you have difficulty matching up emission points with the appropriate construction permit numbers, you should ask for a list from the facility. You may also need to ask for documentation as to why certain units do not have construction permits. A list of current construction permits may also be found in the latest Field Office inspection report.

b. Confirm that construction permit emission limits are federally enforceable "as a practical matter"

Emissions limits placed in either construction permits or operating permits should be enforceable as a practical matter. This means there has to be a tangible way of demonstrating compliance. For example, compliance with a VOC ton/year limit could be demonstrated by tracking the amount of material used per month and assuring that the VOC content of the material was under a certain value.

An example of a limit that is not enforceable as a practical matter would be a ton per year emission limit with no specific short-term verification such as daily, weekly or monthly monitoring. The facility would not be able to confirm its compliance status until the end of the year when they calculate the annual total. For a more detailed discussion on federal enforceability issues, read EPA's guidance on limiting potential to emit in new source permitting (Appendix D).

c. Confirm any outstanding stack testing requirements

Review the information resulting from the Title V information request.

3. Check applicable requirements (Emission Point Information Forms) claimed by applicant against the staff judgment of requirements for grandfathered / unpermitted / exempted sources

Check to make sure the facility has identified all the requirements to which the emission point or facility is subject. It is possible that the facility listed requirements that they may not be subject to. Below is a list of general applicable requirements that an emission point may be subject to.

a. Particulate Matter - 23.3(2)

- b. Fugitive Dust - 23.3(2)"c"
- c. Visible Emissions - 23.3(2)"d"
- d. SO₂ - 23.3(3)
- e. Specific Processes - 23.4
- f. Provisions of any existing court orders, administrative orders

- 4. Confirm source has all necessary construction permits and verify all exemptions from construction permitting

Look at the construction/modification dates on Form 3.0 to determine whether a construction permit is required. If the unit was constructed or modified after September 23, 1970, it should have a construction permit unless it was exempt or a VOC-only source. A VOC-only source constructed after April 22, 1987 should have a construction permit, unless it was exempt.

L. Review Compliance Status

Look through the Emission Point Information forms for any points or rules that the facility states they were not in compliance with at the time the application was submitted.

- 1. Confirm that facility is "in compliance" if applicant claims to be on Emission Point Information Forms
 - a. Check records for variances from applicable rules (567 IAC 21.2)

Look through the facility file for copies of any variances that have been issued to the facility. If the facility has claimed a variance that you cannot find in our records or on the n: drive ([\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Compliance\Variances](http://iowa.gov.state.ia.us/data/DNR_AQ_Shared/Compliance/Variances)), ask the compliance section or request a copy from the facility.

- 2. Confirm that facility is "on schedule" if non-compliance is claimed and a compliance schedule is provided
- 3. Review compliance schedule for acceptability (is it timely?)
- 4. If necessary, complete Title V Facility Work Request form and discuss any compliance issues and schedules with Compliance Unit

The Request for Enforcement Action form is located on the n: drive (<N:\DNR Shared Perm\Templates\AQ\Operating Permits\Title V Facility Work Request3.dotx>).

- 5. Review most recent field office inspection report

M. Review Proposed Limits, if any have been included

Because of the grain mediation discussions, we no longer incorporate short-term (lb/hr) limits into Title V permits. If the facility wishes to propose a short-term limit, they must go through construction permitting. Otherwise, if the facility can demonstrate compliance with a proposed annual limit by material balance or by tracking hours of operation, it can usually be incorporated into the Title V permit.

- 1. Check calculations for acceptable assumptions, math, etc.

Were realistic assumptions made in calculating the limit proposed by the facility? Does it appear, based on past actual emissions, can they realistically comply with the proposed limit? Facilities may try to propose limits that would reduce a unit's emissions to levels below those requiring a stack test or O&M Plan. However, keep in mind that proposed limits might require additional monitoring or testing to demonstrate compliance.

2. **Confirm that proposed limits would constitute "Federally Enforceable Permit Limits"**

In general, annual emission caps are not considered federally enforceable without the appropriate monitoring requirements (see Appendix D).

N. **Review Periodic Monitoring/CAM Proposals**

Periodic Monitoring:

Review the emissions data for each point and compare this with DNR's Periodic Monitoring Guidance Document (Appendix C). If the matrix found in Attachment 1 of DNR's Periodic Monitoring Guidance requires an Agency Operation & Maintenance (O&M) Plan, the facility is required to submit an O&M plan. DNR is required to review and approve or deny it. Compare the proposed O&M Plan with the examples found on the n: drive ([\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Operating Permits\Reference Documents\AGENCYOM](http://iowa.gov.state.ia.us/data/DNR_AQ_Shared/Operating Permits/Reference Documents/AGENCYOM)). Are the plans similar to the examples on the p: drive? The evaluation should also take into account the compliance history of the emission point and the facility. Source should also be evaluated for any stack testing based on the guidelines found in the Periodic Monitoring Guidance Document (Appendix C) notes.

CAM:

If the facility has any pollutant-specific emission units subject to CAM, the CAM requirements will take the place of periodic monitoring requirements. Review the proposed CAM plan to ensure it meets the requirements of 40 CFR 64.3 and 64.4. Example CAM plans are available on EPA's Emissions Measurement Center (EMC) web site (<http://www.epa.gov/ttn/emc/cam.html>) or [\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Operating Permits\Reference Documents\CAM](http://iowa.gov.state.ia.us/data/DNR_AQ_Shared/Operating Permits/Reference Documents/CAM)

Please document your decision with regard to periodic monitoring and CAM in the Title V review

1. **Confirm monitoring has been proposed for all sources meeting the criteria**
 2. **Confirm acceptability of proposed monitoring**
 3. **Develop draft monitoring for those affected sources for which none was proposed, or for which the proposal was determined to be unacceptable**

If no plans were submitted by the facility or their plan was unacceptable, prepare a sample plan based on the examples found on the n: drive ([\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Operating Permits\Reference Documents\AGENCYOM](http://iowa.gov.state.ia.us/data/DNR_AQ_Shared/Operating Permits/Reference Documents/AGENCYOM)) or [\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Operating Permits\Reference Documents\CAM](http://iowa.gov.state.ia.us/data/DNR_AQ_Shared/Operating Permits/Reference Documents/CAM) as well as EPA's examples (<http://www.epa.gov/ttn/emc/cam.html> or <http://www.epa.gov/ttn/atw/utrain.html>). Take into account the operating parameters of the control equipment at the facility.

- O. **Send outreach follow-up letter via certified mail with request for any additional information (If a site visit was done.)**

Deadline date for response: _____

Send a follow-up letter to the responsible official, and copy the permit contact person and field office. For a more detailed discussion of what to include in the follow-up letter, see the follow-up letter guidance located on the n: drive (\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Operating Permits\Reference Documents\Guidance\FollowUp Letters.docx).

- P. **Update tracking information in Title V database including all information requests to the facility**

The Title V database is located on the (\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\AQBureau\Database\Operating Permits\permits.mdb). Tracking information can be updated by opening the "Title V Data Entry Form," searching for the facility you are working on, and then clicking on the "Review" tab. The following milestones are tracked:

- date the project is assigned ("Assigned")
- date the TV information request is sent ("TVInfoRq")
- date the technical review starts (i.e. 30day letter is sent to facility) ("TechRvw")
- date the draft permit is sent to the facility for review prior to public notice ("FacilityRvw")
- date the public comment period begins ("Notice")
- date permit is issued ("Issued")
- date permit expires ("Expiration")

Other information that should be updated in the database includes the permit # and contact information. See Weston if you have any questions.

III. DRAFT TITLE V OPERATING PERMIT

What to look for in draft construction permits sent for review by the construction permitting section.

- Is the language in a plant wide limit consistent across all construction permits you have identified during your review while drafting the Title V permit.
- Is it a true plant wide limit or is it covering a particular set of processes. Would it be helpful to note in the construction permit that combustion sources are not included?
- Look for conflicting permit conditions in several different construction permits.
- Updated stack characteristics.
- Correct emission point, emission unit and process description as compared to the Title V application. We will go with the Title V application values, but this is an opportunity to identify conflicts.
- Are the NSPS and NESHAP applicability determinations still valid today?
- Testing requirements – are completed stack tests noted in the revised construction permit, are the correct EPA test methods being referenced.

Templates used to draft the Title V permit are available on the n: drive (<N:\DNR Shared Perm\Templates\AQ\Operating Permits>). Below is a description of each file:

Permit:

- [Permit\TV Permit CoverPage2c_permit#_initials.dotx] = cover page
- [Permit\Table of Contentspermit#_initials.dotx] = table of contents and abbreviations page
- [Permit\Equipment Listpermit#_initials.dotx] or [Permit\Equipment List w Small Unit Notepermit#_initials.dotx] = permit equipment list (2 different styles)
- [Permit\Plant-wide Conditions3permit#_initials.dotx] = plant-wide conditions
- [Permit\EP Specific Conditions w CAMinitialpermit#_initials.dotx] or [Permit\EP Specific Conditions w CAMrenewal_facility O&Mprmt#_int.dotx] = emission point-specific conditions (duplicate for each emission point)
- [Permit\General Conditions v27.dotx] = general conditions

Other Documents:

- Directory of [N:\DNR Shared Perm\Templates\AQ\Operating Permits\Factsheets](#) Folder for Factsheet templates
- Directory of [N:\DNR Shared Perm\Templates\AQ\Operating Permits\Public Notice](#) Folder for Public Notice templates
- Directory of [N:\DNR Shared Perm\Templates\AQ\Operating Permits](#) Folder for various Title V templates
- Master index of Title V templates see [N:\DNR Shared Perm\Templates\AQ\Operating Permits\TemplateMasterList.docx](#)

A. Incorporate all "generally applicable requirements" into draft permit

These are part of the permit template, but there may be cases where a facility-wide limit has been set. If a facility-wide limit exists, it should be placed in the plant-wide conditions section of the permit. An example would be a facility-wide cap on VOCs.

B. Incorporate all source specific applicable requirements into draft permit

These may include construction permit conditions, pollutant specific requirements from the Iowa Administrative Code (IAC) and source specific standards such as Acid Rain, NSPS or NESHAP standards. Some facilities may also have conditions set forth in Administrative Orders that should be incorporated into the permit.

Iowa AG's Office http://www.iowaattorneygeneral.org/latest_news/

Administrative Orders are filed in the construction folders. Administrative orders issued from 1983 through 2002 are posted at

[\iowa.gov.state.ia.us\data\DNR_AQ_Shared\AQBureau\Legal\Administrative Orders Project\](#)

C. Incorporate approved "proposed limits" (if any) for specific sources into draft

Proposed limits are limits that have been requested by the facility. 567 IAC 22.108(14) should be cited as the authority for requirement for requested limits. Note that past Title V permits may have used 22.108(13) instead.

D. Incorporate approved compliance schedule (if any) into draft permit

If the facility is out of compliance with an applicable requirement at the time of permit issuance, a timeline for coming into compliance should be incorporated into the permit. For example, the facility needs to apply for a construction permit by a specific date. Read subparagraphs 22.105(2)"h" and "j" for more information regarding compliance schedules.

All compliance plans should be discussed with the compliance section before incorporating them into the draft permit.

E. Incorporate periodic monitoring & CAM conditions for those sources meeting criteria

Use DNR's Periodic Monitoring Guidance document to evaluate the monitoring conditions for emission points and incorporate the appropriate conditions into the permit or the CAM criteria for CAM affected sources.

F. Confirm, after federal deadline of June 20, 1999, that sources subject to Risk Mgt. Plans, 112(r), have submitted their plan to EPA (General Facility Requirements Form)

Iowa does not enforce the section 112(r) regulations. However, we are required to confirm that affected facilities have filed their plans with EPA - Region 7. See Chris Kj. for a list of facilities that have submitted Risk Management Plans (RMPs).

G. Attach and cross-reference any necessary appendices (i.e. Acid Rain Permit, orders, NESHAPs, etc.)

If the facility is subject to Acid Rain, the applicable requirements (SO_x and NO_x) are documented by referencing the appropriate Acid Rain permit in the Operating permit. See the example cut and paste page on the n: drive ([N:\DNR Shared Perm\Templates\AQ\Operating Permits\Permit\TV Permit Condition Cut & Paste Page v8a.dotx](#)). Any administrative order that is attached must have the signatures of the Director and the facility.

H. Incorporate any "state only" or "local only" limitations or requirements and identify them as such

An example of a "state only" limitation/requirement would be a provision in a DNR issued variance from an applicable requirement, or the open burning requirements listed in the general conditions. Mercury testing and monitoring of coal fired electric utilities is another example of "state only".

I. For renewal applications, review semi-annual monitoring reports & annual compliance certifications submitted during past permit term

The previous permit term's Title V compliance reports should be available in the facility file folders. A summary of all the Title V compliance reports received is available in one of the compliance section's access databases
(\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\AQBureau\Database\Compliance\TV-ComplianceReports.accdb).

J. Prepare Fact Sheet, Permit Writer Notes & Spreadsheets that discuss the review decisions

Fill out the Fact Sheet template with the appropriate information.

Permit Writer Notes are intended to document the thought process of the permit writer and include the decisions made during the drafting of the permit. Periodic monitoring decisions, compliance status and compliance plans should be discussed, as well as applicability of federal regulations such as NSPS, NESHAP, Stratospheric Ozone, CAM, PSD, etc. Currently there is no standard template for Permit Writer Notes, but all should contain the basic information noted above.

Spreadsheets are often a useful way to summarize the facility's potential and actual emissions from each emission point. If the facility's calculated values differ from the calculations done by the permit writer, the reason for the difference should be noted.

K. Give the Draft Permit, Fact Sheet, & Permit Writer's Notes to your senior for review prior to sending the documents to the facility. Once a senior has reviewed the documents, make any necessary corrections prior to sending the information to the facility.
The senior will enter the date they complete their review into EASYAir.

A senior should conform to the following guidelines for this review:

- a) General format of the permit: The draft permit should conform to the most current format version.
- b) Title V applicability: The Title V applicability must be documented, such as whether a facility is a major source for criteria/HAP/~~GHG~~ pollutants.
 1. For a minor source required to have a TV permit, the review notes must document the reason for the TV permit and the units that should be included in the TV permit.
 2. For a facility that is a single stationary source with other facilities, the review notes should identify all the facilities under the one-source determination and specify the related program applicability issues, such as whether all the facilities together are a major source for criteria/HAP pollutants.
- c) Insignificant activities: The qualification of insignificant activities should be checked and their capacities (combustion sources and storage tanks) should be specified.
- d) Applicable construction permits: For an initial TV permit, all applicable construction permits should be checked; but for a renewal TV permit, only the construction permits issued after last TV permit was issued should be checked.
- e) Applicable federal rules: For all the federal rules, such as NSPS, NESHAP, and Acid Rain/CSAPR, the applicability determination should be documented in the review notes. Related, but non-applicable, rules should be documented as to why the rules are not applicable to the facility at this time.

- f) Periodic monitoring/CAM: The type and level of periodic monitoring should be based on the PMG Guidance and must be sufficiently documented in the review notes and/or calculation spreadsheet. The selection, range, and the monitoring frequency of indicators in a CAM plan should be justified and documented.
- g) Other issues: Other issues could be identified during the review and these issues should be evaluated and discussed with the permit writer.

The level of review details and thoroughness could be different depending on the specific permits under review and the experience and expertise of the permit writer.

L. Send Draft Permit, Fact Sheet, & Permit Writer's Notes to responsible official and plant contact (7/15-day informal facility review period)

Deadline Date for Response: _____

Enter the date you send the draft permit to the facility in both EASYAir and access.

Insert the end date of facility review period. It is acceptable to extend the review period if it is a complex permit, or there is sufficient justification for an extension. To expedite the facility review period, it is acceptable to e-mail these documents.

M. Schedule outreach visit during facility review period if the facility wishes to discuss draft permit (notify field office if the visit is to take place at the facility) (optional)

The purpose of this visit is to discuss any concerns the facility has with the draft permit and try to come to some kind of resolution.

N. Update tracking information in Title V database including all information requests to the facility

O. Confirm with compliance that there are no current compliance actions with the facility prior to proceeding to the public notice phase.

This step was added to avoid putting a permit on notice that has an active compliance action but no compliance plan incorporated in to the Title V permit.

IV. PUBLIC NOTICE INTENT TO ISSUE TITLE V PERMIT

The E-notice process will revolve around the normal publication of the EcoNewsWire which goes out every Thursday. Information that goes to the listserve can be emailed as late as mid-day Wednesday if necessary. The standard process will be to email the information to the website folks (Don or Brad) on Monday. This will allow enough time for the two day turn around for the web posting and be in plenty of time for the listserve. Public notices will start on a Thursday for the E-notice process. This process will be revisited in the future to see how things are working. It is also possible to post the information through the Air Quality Technical listserve by contacting Wendy, but the EcoNewsWire is the preferred method. A print out of the Title Draft Permit webpage on the first day of the public comment period will act as the proof of publication. Ensure the print out has a date stamp.

A. If comments are received during facility review period, make any necessary changes to permit documents

It may not always be possible to incorporate all facility comments. If we cannot incorporate the suggested changes, we should explain in the review notes or in correspondence why changes they requested are not possible under current regulations or department policy.

B. Send draft permit to & solicit comments from:

- 1. EPA (via email) - public notice, fact sheet, permit writer's notes, spreadsheets and draft permit (concurrent 45-day EPA review begins when public comment starts)
Date 45-day EPA review period ends: _____**

E-mail draft permit documents to Peter.David@epamail.epa.gov. Send PDF or Word files. Excel spreadsheets should be converted to PDF. Remember to print a copy of the e-mail, and insert it into the bound record copy of the final title v permit as correspondence because this will be our documentation that it was sent to EPA for their 45-day review.

Example e-mail text:

Attached are the draft permit and associated review documents for [Facility Name XYZ]. The public comment period starts on [xx/xx/xx] and ends on [xx/xx/xx].

The Iowa DNR considers EPA's 45-day review period required by 40 CFR 70.8 to begin at the start of the public comment period. Accordingly, the close of EPA's 45-day review period of this draft permit is [xx/xx/xx]. Any comments received during the public comment period will be forwarded to EPA, and EPA's 45-day review period will be extended if requested.

*Please let me know if you have any questions or concerns regarding the draft permit.
[insert contact info]*

- 2. Post on AQB's web site – (Monday before the notice date.) (30-day public comment period starts when published (Thursday))**
- a. E-mail Jason Dowie and CC: Brad (backup Brad Ashton) PDF's of public notice, fact sheet (with permit writer notes attached), and draft permit.
Also include the text for Don to send to the EcoNewsWire contacts.**

The above documents should be e-mailed to [Jason Dowie](#) in PDF format. See Chris Kj. or Weston if you need assistance creating a PDF file. Remember to attach the permit writer notes to the factsheet before you send the documents. Follow these guidelines when sending the draft permits:

- Include the name of the facility (exactly as it is to be posted on the web), city location of the facility, and its EIQ number (XX-XXXX)
- Send the public notice, fact sheet and draft permit with the following naming scheme (replacing the pound signs with the 4-digit portion of the facility's EIQ number):
 - [#####p.pdf] for the public notice
 - [#####f.pdf] for the fact sheet
 - [#####d.pdf] for the draft permit

Include the End Date of the Public Notice

* Allow a minimum of 2 working days for completion. If Jason Dowie will be unavailable for two or more business days, send your request to Brad Ashton.

Use the template language (posting text) from the Access database email switchboard or the EcoNewsWire template under the Public Notice folder for Operating Permit templates.

Please use Associated Press Style for addresses, months and time for EcoNewsWire publication.

- a. **Dates:** When used with a specific date, abbreviate months Jan., Feb., Aug., Sept., Oct., Nov., and Dec., e.g., *Jan. 2*. Use the numeral for a date, e.g., *Sept. 10* not *Sept. 10th*. We probably don't need the year, unless the start time of the comment period ends in one year and the end time is in another.
- b. **Time:** Use colon to separate hour and minutes, e.g., *11:30*; but do not need minutes when referring just to the hour, e.g., *11 a.m.* Use lower case for a.m. and p.m.
- c. **Addresses:**
 1. List the County where facility is located.
 2. Use abbreviations *Ave.*, *Blvd.* and *St.* with a numbered address. Spell out *alley*, *drive* and *road*.
 3. Always use a figure for an address number, e.g., *9 Morningside Circle*.
 4. Spell out *First* through *Ninth* when part of a street name; use figures for 10th and above, e.g., *122 First St.*, *103 22nd St.*
 5. Abbreviate compass points: *222 E. Campus Drive* or *143 Green St. N.W.*
 6. Don't list the state or zip code.

- b. **Don will email the EcoNewsWire contacts the information for posting on Tuesday with the subject line "AQ Permits for EcoNewsWire on ##.##.#### of Eco"**

Contacts: Primary Jessie.Brown@dnr.iowa.gov and CC: Karen.Grimes@dnr.iowa.gov and Alex.Murphy@dnr.iowa.gov

- c. **Date public comment period begins:** _____

- d. **Date public comment period ends:** _____

- e. **Print a copy of the Title V draft webpage on the first day of the public notice. Ensure there is a date stamp on the printed page. A suggestion is to print this to a pdf to maintain a copy with electronic permitting documents on our network drives.**

3. **Post in local library -**

This information may be found in the Iowa Library Directory's web site (<http://www.statelibraryofiowa.org/ld/c-d/directories>).

- a. **Send via first class mail – Cover letter and public notice**

The above documents should be available at the information desk of the library. There may be locations that do not have a library. Other places that may be used to post public notices are city hall, post offices, fire stations or other public buildings.

An example cover letter is located at (N:\DNR Shared Perm\Templates\AQ\Operating Permits\Public Notice\PublicNotice to Library LtrRe_Tra Enotice.dotx).

4. **Facility -**

- a. **Mail via first class to responsible official & permit contact - public notice, fact sheet, permit writer's notes, spreadsheets and draft permit**

5. Surrounding states - E-mail public notice (if applicable)

For facilities that are within 50 miles of the border of another state, we are required to give notice to the affected state or local programs (Omaha, NE). Use the "Title V Public Comment Email Notify" form in the Title V database switchboard (\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\AQBureau\Database\Operating Permits \permits.accdb) to generate a notice to affected states and people who have requested a notification.

6. Affected local programs (Omaha) - Mail public notice (if applicable)

7. Field Office – E-mail public notice, fact sheet, permit writer's notes, spreadsheets and draft permit

E-mail the above documents to the appropriate Field Office Supervisor and lead air person (listed in section II. C).

See Appendix B for a list of counties and the corresponding Field Office if you need to confirm which Field Office to send the documents to. You can also use the "Affected States" query in the title v database to locate the appropriate field office.

8. E-mail public notice to persons who have requested to be on a mailing list

Use the "Title V Public Comment Email Notify" form in the Title V database switchboard (\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\AQBureau\Database\Operating Permits \permits.accdb) to generate a notice to affected states and people who have requested a notification.

C. Update tracking information in Title V database

Enter the starting date of the public notice in both EASYAir and access.

D. Schedule outreach visit during public comment period if the facility wishes to discuss proposed permit (notify field office if the visit is to take place at the facility) (optional)

E. If a public hearing is held, e-mail the required information to be posted on the State Public Meeting Calendar

Use the form posted at \\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Operating Permits\Procedure\Public meeting calendar memo.docx in order to organize the information to be posted on the state's Public Meeting web site (<https://www.iowa.gov/pmc/pmc.php>).

V. ISSUE TITLE V PERMIT

A. If comments were received during the public comment/EPA review period:

1. Develop Responsiveness Summary

The responsiveness summary is used to address all comments received during the public comment period. This should be written in a specific format. Use the same format as the example on the n: drive (<N:\DNR Shared Perm\Templates\AQ\Operating Permits\Permit\Responsiveness Summary.dotx>).

2. Make necessary changes to permit documents

We will not necessarily incorporate all public, facility, or EPA comments. This is done on a case-by-case basis. Discuss this with Weston or Chris Kj.

3. **Provide Responsiveness Summary and any revised permit documents to all commenters, EPA, field office and facility (depending on the type of comments, this may be done with the final permit)**

B. **Before issuing final permit, confirm with EPA that it is acceptable to do so based on the proposed permit. If EPA requests it, give additional 45-days for their review of the proposed permit.**

Call or e-mail David Peter to confirm whether EPA intends to review the draft permit, or wishes to have an additional 45-days. E-mail a list of any changes to the permit.
telephone: (913) 551-7397
E-mail: peter.david@epa.gov

C. **Remove "draft" or "proposed" from permit, get permit number, add dates for permit term, change dates of stack tests to correspond with permit dates, and get signature**

The permit number list is located in Weston's cubicle. The permit term should be five (5) years. The expiration date will be one day prior to the day the permit was issued (i.e. Issue Date: March 21, 2003; Expiration Date: March 20, 2008). If this seems confusing, think of a calendar year. One year is Jan.1 to Dec. 31. The next Jan. 1 starts the next year. Use can also use the Title V Permitting Dates form in the Title V database switchboard (P:\Database\Title_V\permits.mdb click on the "Title V Permitting Dates" tab) to get the proper dates for the permit.

The following format will be used for permit renewals:

##-TV-###R#

1. Keep the original permit number.
2. Add the renewal designation ("R#").
3. Remove the modification designation if the permit had been modified ("-M###"). We will add the modification designation back to the permit number, starting with "-M001" if the renewed permit is modified during the new permit term.
4. The footer should show [permit writer initials](#) (left) – page number (center) – [issuance date and permit number](#) (right).

D. **Mail final permit, permit writer's notes, spreadsheets (if necessary) and Responsiveness Summary (if one was created) to the following:**

1. **Facility - responsible official (via certified mail) & permit contact (e-mail)**
2. **EPA (via e-mail)**
3. **Field Office (via e-mail)**
4. **All commenters (via e-mail)**

An example cover letter is available on the n: drive
[\(N:\DNR Shared Perm\Templates\AQ\Operating Permits\Permit\FinalPermit CoverLtr2aBRGipp.dotx\)](#).

E. **Send e-mail notification with a completed form regarding permit issuance to "TV Permits Notify" group in Google Mail**

Enter the date you send the permits notify email into EASYAir.

Your e-mail should include the following information:

- Are there any stack tests required? If yes, list the affected emission point #'s.
- Are there any compliance plans? If yes, briefly describe the non-compliance issue and the affected emission point #'s.
- Are there any NESHAP or NSPS affected units? If yes, list the affected emission point #'s.
- Location of the final permit and review notes on the p: drive.
- The format and an example is available on the p: drive ([N:\DNR Shared Perm\Templates\AQ\Operating Permits\Permit\TV Permits Notify.dotx](#)).

- F. Copy all electronic files associated with permit review including e-mails to:**
[\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Operating Permits\FINAL.TV\](#)[last 4 digits of eiq#]

It is important for staff to be able to distinguish between electronic files for initial permits, modified permits, and renewed permits. Below is an example of how folders should be named. Subfolders can be created, if necessary.

[\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Operating Permits\FINAL.TV\9999\](#)
 \initial\
 \mod1\
 \mod2\
 \mod3\
 \renewal1\
 \mod1\
 \renewal2\
 \mod1\
 \mod2\

- G. E-mail Jason Dowie (backup Brad Ashton) a PDF of the final permit for posting on AQB's web site**

In your e-mail:

- include the name of the facility (as it is to be on the web), the city in which it is located, the permit number, and the EIQ number the name of the file should be the permit number with all letters being capitalized (i.e. "02-TV-005M002.pdf")
 - If Applicable - identify the previous name of the facility if it has changed names.
- * Allow a minimum of 2 working days for completion. If Jason Dowie will be unavailable for two or more business days, send your request to Brad Ashton.

- H. Update tracking information in Title V database, including the hyperlink, update or enter the permit number and enter stack tests in the stack test database. Enter the issuance date and permit duration dates in EASYAir.** (<https://programs.iowadnr.gov/stacktest/pages/login.aspx>). Instruction for the stack test database are here [N:\DNR Shared Perm\Templates\AQ\Operating Permits\SOP for Entering Title V Tests into Stack Test Database2.dotx](#).
- I. Schedule outreach visit if the facility wishes to discuss the final permit (notify field office if the visit is to take place at the facility) (optional)**

- J. **Bind Permit and include the following (start a new binder for renewed permits or a large clip can be used):**
 - a. **final permit**
 - b. **review check sheet**
 - c. **fact sheet**
 - d. **public notice with proof of publication (print out of webpage)**
 - e. **responsiveness summary (if one was created)**
 - f. **permit writer's notes & spreadsheets**
 - g. **correspondence**

The order of the documents listed above is the same general order in which the record copy of the final permit should be put together. Binders and labels are available in the office supply area or a large metal clip may be used instead. A template for the label is available on the [N:\drive \(N:\DNR Shared Perm\Templates\AQ\Operating Permits\Permit\TV Permit Label.dotx\)](N:\drive (N:\DNR Shared Perm\Templates\AQ\Operating Permits\Permit\TV Permit Label.dotx).

- K. Upload a PDF version of the Title V permit and permit writer notes to EASYAir

VI. **CLEAN-UP TITLE V RECORDS**

Once you have completed the file cleanup process enter the date into EASYAir.

- A. **Stage records for long-term storage.** (N:\DNR Shared Perm\Templates\AQ\Operating Permits\Record file cleanup procedure for Title V June 2018_v2.dotx)
- B. **Recycle extra copies of emissions inventories and applications (there should only be one copy of each)**

APPENDICES

AFFECTED STATES/LOCAL PROGRAMS

(5/10/2007)

See Title V database switchboard form "Title V Public Comment Email Notify"

FIELD OFFICE LOCATIONS FOR IOWA COUNTIES

CO#	COUNTY	FO#	CO#	COUNTY	FO#	CO#	COUNTY	FO#
01	Adair	4	34	Floyd	2	67	Monona	4
02	Adams	4	35	Franklin	2	68	Monroe	5
03	Allamakee	1	36	Fremont	4	69	Montgomery	4
04	Appanoose	5	37	Greene	4	70	Muscatine	6
05	Audubon	4	38	Grundy	2	71	O'Brien	3
06	Benton	1	39	Guthrie	4	72	Osceola	3
07	Black Hawk	1	40	Hamilton	2	73	Page	4
08	Boone	5	41	Hancock	2	74	Palo Alto	3
09	Bremer	1	42	Hardin	2	75	Plymouth	3
10	Buchanan	1	43	Harrison	4	76	Pocahontas	3
11	Buena Vista	3	44	Henry	6	77	Polk	5
12	Butler	2	45	Howard	1	78	Pottawattamie	4
13	Calhoun	3	46	Humboldt	2	79	Poweshiek	5
14	Carroll	4	47	Ida	3	80	Ringgold	4
15	Cass	4	48	Iowa	6	81	Sac	3
16	Cedar	6	49	Jackson	1	82	Scott	6
17	Cerro Gordo	2	50	Jasper	5	83	Shelby	4
18	Cherokee	3	51	Jefferson	6	84	Sioux	3
19	Chickasaw	1	52	Johnson	6	85	Story	5
20	Clarke	5	53	Jones	1	86	Tama	5
21	Clay	3	54	Keokuk	6	87	Taylor	4
22	Clayton	1	55	Kossuth	2	88	Union	4
23	Clinton	6	56	Lee	6	89	Van Buren	6
24	Crawford	4	57	Linn	1	90	Wapello	6
25	Dallas	5	58	Louisa	6	91	Warren	5
26	Davis	6	59	Lucas	5	92	Washington	6
27	Decatur	5	60	Lyon	3	93	Wayne	5
28	Delaware	1	61	Madison	5	94	Webster	2
29	Des Moines	6	62	Mahaska	5	95	Winnebago	2
30	Dickinson	3	63	Marion	5	96	Winneshiek	1
31	Dubuque	1	64	Marshall	5	97	Woodbury	3
32	Emmet	3	65	Mills	4	98	Worth	2
33	Fayette	1	66	Mitchell	2	99	Wright	2

Link to DNR's Periodic Monitoring Guidance:

\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Operating Permits\Reference Documents\Periodic Monitoring\Pmguide3updatedM5.doc

Link to EPA's Guidance on Limiting Potential to Emit in New Source Permitting:

\\iowa.gov.state.ia.us\data\DNR_AQ_Shared\Operating Permits\Reference Documents\Guidance\Limiting PTE in NSR.pdf

Appendix E.

1. Alt Method - Newspaper - (30-day public comment period starts when published)

The public notice must be published for one day in the newspaper of record for the area the facility is located. The newspaper of record is the paper with the largest number of readers in the area. The newspaper of record can normally be found at the Iowa Newspaper Association's website (<http://www.inanews.com/>). For renewals you should be able to look at the bound copy of the previous permit for the newspaper in which the public notice had been published.

a. Contact local Newspaper by phone

You need to ask the newspaper if they publish on a daily or weekly basis, and what days they publish. You should also ask how far in advance they must receive the public notice in order for it to be published on the day you are planning.

b. Inquire about the approximate cost of a legal notice

If it is more than \$50, you will need supervisor approval. Note that the Omaha World Herald may be too expensive.

c. E-mail public notice

d. Date public comment period begins: _____

e. Date public comment period ends: _____

Special Processing:

Gannett Company (DM Register, USA Today, Press Citizen, etc...) now requests payment at the time a public notice order is placed. If staff need to publish a public notice in a Gannett Company publication a P-card will need to be used for payment when they place the order.

1. Staff member contacts publication representative and places order.
2. Payment Process:
 - a. By phone- transfer publication representative to Norma for payment. If Norma is out, publication representative can leave a message and Norma will call them back to make payment.
 - b. By email- copy Norma on email to publication representative. Norma will call the publication representative to make payment.
3. Norma will use the bureau P-card to process the payment request on the phone and request that an invoice be sent to her showing that the payment was made.

Iowa Department of Natural Resources

Draft Title V Operating Permit Fact Sheet

This document has been prepared to fulfill the public participation requirements of 40 CFR Part 70 and 567 Iowa Administrative Code (IAC) 22.107(6). 40 CFR Part 70 contains operating permit regulations pursuant to Title V of the Clean Air Act.

The Iowa Department of Natural Resources (DNR) finds that:

1. Facility Name, located at Address, city, IA zip has applied to renew their Title V Operating Permit. The designated responsible official of this facility is RO Name.
2. Facility Name is a facility description. This facility consists of # emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ($\leq 2.5 \mu\text{m}$)	PM _{2.5}	
Particulate Matter ($\leq 10 \mu\text{m}$)	PM ₁₀	
Particulate Matter	PM	
Sulfur Dioxide	SO ₂	
Nitrogen Oxides	NO _x	
Volatile Organic Compounds	VOC	
Carbon Monoxide	CO	
Lead	Lead	
Hazardous Air Pollutants ⁽¹⁾	HAP	

⁽¹⁾ May include the following: List all HAPs (If over 25 reference application).

3. Facility submitted a Title V Operating Permit renewal application on Date and any additional information describing the facility on Date. Based on the information provided in these documents, DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 22.107.
4. DNR has complied with the procedures set forth in 567 IAC 22.107, including those regarding public notice, opportunity for public hearing, and notification of EPA and surrounding state and local air pollution programs.

DNR procedures for reaching a final decision on the draft permit:

1. The public comment period for the draft permit will run from **Publication Date** through **End Date**. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Permit Writer at the DNR address shown below. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period.
2. Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to Permit Writer at the DNR address shown below.
3. DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the renewal application. The responsiveness summary and the final permit will be available to the public upon request.

Permit Writer

Iowa Department of Natural Resources - Air Quality Bureau

Wallace State Office Building

502 E 9th St.

Des Moines, Iowa 50319-0034

Phone: (515) Phone Number

E-mail: Name@dnr.iowa.gov

DNR concludes that:

1. DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 20-35, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.
2. DNR has the authority to issue operating permits for air contaminant sources and to include conditions in such permits under 455B.134 Code of Iowa.
3. The emission limits included in this permit are authorized by 455B.133 Code of Iowa and 567 IAC Chapters 20-35.
4. DNR is required to comply with 567 IAC Chapter 22 in conjunction with issuing a Title V Operating Permit.
5. The issuance of this permit does not preclude the DNR from pursuing enforcement action for any violation.

IV. General Conditions

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code chapter 22.

G1. Duty to Comply

1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. *567 IAC 22.108(9)"a"*
2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. *567 IAC 22.105 (2)"h"(3)*
3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. *567 IAC 22.108 (1)"b"*
4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. *567 IAC 22.108 (14)*
5. It shall not be a defense for a permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. *567 IAC 22.108 (9)"b"*
6. For applicable requirements with which the permittee is in compliance, the permittee shall continue to comply with such requirements. For applicable requirements that will become effective during the permit term, the permittee shall meet such requirements on a timely basis. *567 IAC 22.108(15)"c"*

G2. Permit Expiration

1. Except as provided in rule 567—22.104(455B), permit expiration terminates a source's right to operate unless a timely and complete application for renewal has been submitted in accordance with rule 567—22.105(455B). *567 IAC 22.116(2)*
2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall submit on forms or electronic format specified by the Department to the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, Wallace State Office Building, 502 E 9th St., Des Moines, IA 50319-0034, two copies (three if your facility is located in Linn or Polk county) of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. An additional copy must also be sent to U.S. EPA Region VII, Attention: Chief of Air Permitting & Standards Branch, 11201 Renner Blvd., Lenexa, KS 66219. Additional copies to local programs or EPA are not required for application materials submitted through the electronic format specified by the Department. The application must include all emission points, emission units, air pollution control equipment, and monitoring devices at the facility. All emissions generating activities, including fugitive emissions, must be included. The definition of a complete application is as indicated in *567 IAC 22.105(2)*. *567 IAC 22.105*

G3. Certification Requirement for Title V Related Documents

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. *567 IAC 22.107 (4)*

G4. Annual Compliance Certification

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance

status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. *567 IAC 22.108 (15)"e"*

G5. Semi-Annual Monitoring Report

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 22.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. *567 IAC 22.108 (5)*

G6. Annual Fee

1. The permittee is required under subrule 567 IAC 22.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
3. The emissions inventory shall be submitted annually by March 31 with forms specified by the department documenting actual emissions for the previous calendar year.
4. The fee shall be submitted annually by July 1 with forms specified by the department.
5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.
7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.
8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 22.115(1)"d".

G7. Inspection of Premises, Records, Equipment, Methods and Discharges

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. *567 IAC 22.108 (15)"b"*

G8. Duty to Provide Information

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. *567 IAC 22.108 (9)"e"*

G9. General Maintenance and Repair Duties

The owner or operator of any air emission source or control equipment shall:

1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
2. Remedy any cause of excess emissions in an expeditious manner.
3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. *567 IAC 24.2(1)*

G10. Recordkeeping Requirements for Compliance Monitoring

1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:

- a. The date, place and time of sampling or measurements
 - b. The date the analyses were performed.
 - c. The company or entity that performed the analyses.
 - d. The analytical techniques or methods used.
 - e. The results of such analyses; and
 - f. The operating conditions as existing at the time of sampling or measurement.
 - g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)
2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.
3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:
- a. Comply with all terms and conditions of this permit specific to each alternative scenario.
 - b. Maintain a log at the permitted facility of the scenario under which it is operating.
 - c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. *567 IAC 22.108(4), 567 IAC 22.108(12)*

G11. Evidence used in establishing that a violation has or is occurring.

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein.

1. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:
 - a. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 22;
 - b. Compliance test methods specified in 567 Chapter 25; or
 - c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.
2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a. Any monitoring or testing methods provided in these rules; or
 - b. Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule. *567 IAC 21.5(1)-567 IAC 21.5(2)*

G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. *567 IAC 22.108(6)*

G13. Hazardous Release

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 725-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in 567 IAC 131.2(2). *567 IAC Chapter 131-State Only*

G14. Excess Emissions and Excess Emissions Reporting Requirements

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control measures.

Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. A variance from this subrule may be available as provided for in Iowa Code section 455B.143. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation,

reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

2. Excess Emissions Reporting

a. Initial Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An initial report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1)) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable emission standard by more than 10 percent or the applicable visible emission standard by more than 10 percent opacity. The initial report may be made by electronic mail (E-mail), in person, or by telephone and shall include as a minimum the following:

- i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and expected duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps being taken to remedy the excess emission.
- vi. The steps being taken to limit the excess emission in the interim period.

b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required initial reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:

- i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.
- vi. The steps that were taken to limit the excess emission.
- vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. *567 IAC 24.1(1)-567 IAC 24.1(4)*

3. Emergency Defense for Excess Emissions. For the purposes of this permit, an “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The facility at the time was being properly operated;
- c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and
- d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice fulfills the requirement of paragraph 22.108(5)"b." – See G15. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or upset provision contained in any applicable requirement. *567 IAC 22.108(16)*

G15. Permit Deviation Reporting Requirements

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). *567 IAC 22.108(5)"b"*

G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. *567 IAC 23.1(2), 567 IAC 23.1(3), 567 IAC 23.1(4)*

G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification

1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:
 - a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 22.
 - b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);
 - c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
 - d. The changes are not subject to any requirement under Title IV of the Act (revisions affecting Title IV permitting are addressed in rules 567—22.140(455B) through 567 - 22.144(455B));
 - e. The changes comply with all applicable requirements.
 - f. For each such change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:

- i. A brief description of the change within the permitted facility,
 - ii. The date on which the change will occur,
 - iii. Any change in emission as a result of that change,
 - iv. The pollutants emitted subject to the emissions trade
 - v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.
 - vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
 - vii. Any permit term or condition no longer applicable as a result of the change.
- 567 IAC 22.110(1)*

- 2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. *567 IAC 22.110(2)*
- 3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 22.110(1). *567 IAC 22.110(3)*
- 4. The permit shield provided in subrule 22.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. *567 IAC 22.110(4)*
- 5. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. *567 IAC 22.108(11)*

G18. Duty to Modify a Title V Permit

- 1. Administrative Amendment.
 - a. An administrative permit amendment is a permit revision that does any of the following:
 - i. Correct typographical errors
 - ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - iii. Require more frequent monitoring or reporting by the permittee; or
 - iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.
 - b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.
 - c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.
- 2. Minor Title V Permit Modification.
 - a. Minor Title V permit modification procedures may be used only for those permit modifications that satisfy all of the following:

- i. Do not violate any applicable requirement;
 - ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit;
 - iii. Do not require or change a case by case determination of an emission limitation or other standard, or an increment analysis;
 - iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act;
 - v. Are not modifications under any provision of Title I of the Act; and
 - vi. Are not required to be processed as significant modification under rule 567 - 22.113(455B).
- b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:
- i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
 - ii. The permittee's suggested draft permit;
 - iii. Certification by a responsible official, pursuant to 567 IAC 22.107(4), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
 - iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 22.107(7).
- c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 22.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against the facility.

3. Significant Title V Permit Modification.

Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 22, including those for applications, public participation, review by affected states, and review by the administrator, as those requirements that apply to Title V issuance and renewal.

The permittee shall submit an application for a significant permit modification not later than three months after commencing operation of the changed source unless the existing Title V permit would prohibit such construction or change in operation, in which event the operation of the changed source may not commence until the department revises the permit. *567 IAC 22.111-567 IAC 22.113*

G19. Duty to Obtain Construction Permits

Unless exempted in 567 IAC 22.1(2) or to meet the parameters established in 567 IAC 22.1(1)"c", the permittee shall not construct, install, reconstruct or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, or conditional permit, or permit pursuant to rule 567 IAC 22.8, or permits required pursuant to rules 567 IAC 22.4, 567 IAC 22.5, 567 IAC 31.3, and 567 IAC 33.3 as required in 567 IAC 22.1(1). A permit shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source or anaerobic lagoon. *567 IAC 22.1(1)*

G20. Asbestos

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when activities involve asbestos mills, surfacing of roadways, manufacturing operations, fabricating, insulating, waste disposal, spraying applications, demolition and renovation operations (*567 IAC 23.1(3)"a"*); training fires and controlled burning of a demolished building (*567 IAC 23.2*).

G21. Open Burning

The permittee is prohibited from conducting open burning, except as provided in 567 IAC 23.2. *567 IAC 23.2 except 23.2(3)"j"; 567 IAC 23.2(3)"j" - State Only*

G22. Acid Rain (Title IV) Emissions Allowances

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. *567 IAC 22.108(7)*

G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

- a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.
- b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
- c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
- d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.

2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
- d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like

appliance" as defined at § 82.152)

e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.

f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,

5. The permittee shall be allowed to switch from any ozone-depleting or greenhouse gas generating substances to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.
40 CFR part 82

G24. Permit Reopenings

1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. *567 IAC 22.108(9)"c"*

2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as practicable, but not later than 18 months after the promulgation of such standards and regulations.

a. Reopening and revision on this ground is not required if the permit has a remaining term of less than three years;

b. Reopening and revision on this ground is not required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to May 15, 2001.

c. Reopening and revision on this ground is not required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. *567 IAC 22.108(17)"a"*, *567 IAC 22.108(17)"b"*

3. A permit shall be reopened and revised under any of the following circumstances:

a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to July 21, 1992, provided that the reopening may be stayed pending judicial review of that determination;

b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Title V permit;

c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term

of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.

d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements. *567 IAC 22.114(1)*

4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. *567 IAC 22.114(2)*

5. A notice of intent shall be provided to the Title V source at least 30 days in advance of the date the permit is to be reopened, except that the director may provide a shorter time period in the case of an emergency. *567 IAC 22.114(3)*

G25. Permit Shield

1. The director may expressly include in a Title V permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

a. Such applicable requirements are included and are specifically identified in the permit; or

b. The director, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.

2. A Title V permit that does not expressly state that a permit shield exists shall be presumed not to provide such a shield.

3. A permit shield shall not alter or affect the following:

a. The provisions of Section 303 of the Act (emergency orders), including the authority of the administrator under that section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act;

d. The ability of the department or the administrator to obtain information from the facility pursuant to Section 114 of the Act. *567 IAC 22.108 (18)*

G26. Severability

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. *567 IAC 22.108 (8)*

G27. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. *567 IAC 22.108 (9)"d"*

G28. Transferability

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought consistent with the requirements of *567 IAC 22.111(1)*. *567 IAC 22.111 (1)"d"*

G29. Disclaimer

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. *567 IAC 22.3(3)"c"*

G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification

The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with applicable requirements of 567 – Chapter 23 or a permit condition. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. If the owner or operator does not provide timely notice to the department, the department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with applicable rules or permit conditions. Upon written request, the department may allow a notification period of less than 30 days. At the department’s request, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. A testing protocol shall be submitted to the department no later than 15 days before the owner or operator conducts the compliance demonstration. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator
Iowa DNR, Air Quality Bureau
Wallace State Office Building
502 E 9th St.
Des Moines, IA 50319-0034
(515) 725-9545

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program.

567 IAC 25.1(7)"a", 567 IAC 25.1(9)

G31. Prevention of Air Pollution Emergency Episodes

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons. *567 IAC 26.1(1)*

G32. Contacts List

The current address and phone number for reports and notifications to the EPA administrator is:

Iowa Compliance Officer
Air Branch
Enforcement and Compliance Assurance Division
U.S. EPA Region 7
11201 Renner Blvd.
Lenexa, KS 66219
(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau
Iowa Department of Natural Resources
Wallace State Office Building
502 E 9th St.
Des Moines, IA 50319-0034
(515) 725-8200

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

Field Office 1

1101 Commercial Court, Suite 10
Manchester, IA 52057
(563) 927-2640

Field Office 2

2300-15th St., SW
Mason City, IA 50401
(641) 424-4073

Field Office 3

1900 N. Grand Ave.
Spencer, IA 51301
(712) 262-4177

Field Office 4

1401 Sunnyside Lane
Atlantic, IA 50022
(712) 243-1934

Field Office 5

Wallace State Office Building
502 E 9th St.
Des Moines, IA 50319-0034
(515) 725-0268

Field Office 6

1023 West Madison Street
Washington, IA 52353-1623
(319) 653-2135

Polk County Public Works Dept.

Air Quality Division
5885 NE 14th St.
Des Moines, IA 50313
(515) 286-3351

Linn County Public Health

Air Quality Branch
1020 6th Street SE
Cedar Rapids, IA 52401
(319) 892-6000

Title V Fee Revenue Report
2016 - 2021

Title V Fund Fees	Emission Fee 0325 / 325B					
State Fiscal Year	2016	2017	2018	2019	2020	2021
July	5,673,386	135,794	785,917	2,223	40,436	3,397,553
August	0	6,212	-1,925	385	18,624	103,213
September	6,223	1,706	3,445	6,136	29,356	7,431
October	1,583	16,676	7,841	10,186	29,234	2,026
November	5,787	7,147	5,549	12,969	20,269	2,003
December	4,984	-9,101	5,152	9,287	10,235	1,398
January	3,178	3,579	4,142	8,270	17,439	4,694
February	2,823	3,366	7,131	10,653	9,248	428
March	1,888	39,342	5,742	11,184	12,846	-6,546
April	4,779	-26,240	4,338	10,739	9,566	1,189
May	-5,049	3,405	39,583	10,232	12,533	130,388
June	6,288,693	5,701,287	6,248,901	3,689,250	2,731,856	
July	1,749,090	442,253	460,857	3,474,372	331,174	
August	1,186	16,335	23,812	7,745	-8,960	
September	-2,000	-159	-12,389	-2,295	0	
TOTAL	13,736,551	6,341,602	7,588,096	7,261,337	3,263,856	3,643,777
Fees:	13,707,702	6,297,984	7,532,180	7,153,277	3,147,136	3,625,416
Reg Fees/Reimb/Rev:	564	1,173	1,082	124	182	4,273
Interest:	28,285	42,446	54,834	107,936	116,537	14,088
	Operating Permit Application Fee 0325 / 325C					
State Fiscal Year	2016	2017	2018	2019	2020	2021
July		0	-1,925	250	0	2,350
August		0	1,925	16,125	0	-2,350
September		0	37,325	-3,675	29,600	19,400
October		0	18,200	3,250	29,458	725
November		18,400	50,025	87,425	73,050	7,600
December		14,600	73,075	76,300	99,095	119,175
January		0	12,000	0	3,100	56,250
February		0	22,325	65,088	0	34,351
March		0	101,150	85,613	103,700	168,240
April	325	43,525	13,350	12,916	42,100	17,150
May	400	29,575	70,200	133,059	2,275	173,800
June	2,700	19,850	184,425	221,072	3,925	
July	14,464	13,825	25,300	-97,822	85,875	
August	-3,489	44,375	163,675	86,100	47,108	
September	1,575	13,500	36,850	61,650	0	
TOTAL	15,975	197,650	807,900	747,350	519,286	596,691
Fees:	15,975	197,650	807,900	747,350	519,286	596,691
Regis Fees/ Reimb:						
Interest:						
TOTAL FUND	13,752,526	6,539,252	8,395,996	8,008,687	3,783,142	4,240,468

Final Title V Permits

Total # of Active Permits: 269

Facility Name	Site City	EIQ #	Facility #	Permit #	Issued	Expiration
3M (Minnesota Mining & Manufacturing Co.)	Knoxville	92-3629	63-01-001	01-TV-025R2-M002	11/9/2016	6/16/2020
Absolute Energy, LLC	Saint Ansgar	92-6948	66-10-001	13-TV-007R1	1/2/2019	1/1/2024
ADM Clinton BioProcessing	Clinton	92-6805	23-01-006	17-TV-002	5/19/2017	5/18/2022
ADM Corn Processing - Clinton	Clinton	92-0265	23-01-006	06-TV-007	12/5/2006	12/4/2011
ADM Corn Processing / COGEN Plant - Clinto	Clinton	92-6795	23-01-006	11-TV-007R1	3/30/2017	3/29/2022
Ag Processing Inc - Algona, IA	Algona	92-6977	55-01-032	15-TV-008R1	6/1/2020	5/31/2025
Ag Processing Inc - Eagle Grove, IA	Eagle Grove	92-0050	99-01-001	05-TV-005R2	10/27/2017	10/26/2022
Ag Processing Inc - Emmetsburg, IA	Emmetsburg	92-6862	74-01-012	04-TV-013R1	3/10/2017	3/9/2022
Ag Processing Inc - Manning, IA	Manning	92-0051	14-02-003	11-TV-004R1	5/5/2017	5/4/2022
Ag Processing Inc - Mason City, IA	Mason City	92-0052	17-01-027	12-TV-003R1	3/30/2017	3/29/2022
Ag Processing Inc - Sergeant Bluff, IA	Sergeant Bluff	92-0053	97-04-005	99-TV-004R2	11/1/2017	10/31/2022
Ag Processing Inc - Sheldon, IA	Sheldon	92-0054	71-01-001	12-TV-001R1	7/14/2017	7/13/2022
Ajinomoto Animal Nutrition North America, In	Eddyville	92-2456	68-09-002	00-TV-028R3	8/19/2019	8/18/2024
Alliance Pipeline L.P./Manchester 27-A Compr	Manchester	92-6899	28-01-026	03-TV-014R3	9/9/2019	9/8/2024
Altec Osceola Body Plant	Osceola	92-4329	20-01-018	09-TV-003R1-M001	9/1/2017	7/10/2021
American Packaging Corporation	Story City	92-0209	85-03-003	00-TV-058R3-M001	11/4/2016	8/21/2021
Amsted Rail Company, Inc.	Keokuk	92-2304	56-01-023	02-TV-014R3	9/9/2019	9/8/2024
ANR Pipeline Company - Birmingham Compre	Birmingham	92-0251	51-03-001	99-TV-033R4	7/25/2016	
ANR Pipeline Company - Lineville Compresso	Lineville	92-0252	93-05-001	00-TV-025R3	7/19/2017	7/18/2022
Archer Daniels Midland - Des Moines Soybean	Des Moines	92-6313	77-01-045	04-TV-020R1	4/23/2014	4/22/2019
Archer Daniels Midland Company	Cedar Rapids	92-9062	57-01-080	08-TV-004R1-M002	1/1/2020	1/5/2022
Arconic Davenport Works (formerly Alcoa)	Riverdale	92-0132	82-01-002	03-TV-025R3	2/4/2021	2/3/2026
Arcosa Wind Towers, Inc.	Newton	92-6937	50-01-049	15-TV-012R1	6/9/2021	6/8/2026
Ashley Industrial Molding, Inc.	Oelwein	92-6974	33-01-003	14-TV-009R1	5/13/2019	5/12/2024
Atlas Molded Productions A Division of Atlas	Washington	92-6865	92-01-021	99-TV-041R3	2/12/2016	2/11/2021
Bayer CropScience LP	Muscatine	92-3670	70-01-008	04-TV-002R2-M002	3/23/2017	7/27/2021
Bayer CropScience LP	Muscatine	92-6908	70-01-008	04-TV-006R2	6/15/2016	6/14/2021
Bayer CropScience LP	Muscatine	92-6909	70-01-008	04-TV-010R2-M001	10/17/2018	6/6/2022
Bemis Company, Inc. - Centerville	Centerville	92-5276	04-01-002	01-TV-001R3	2/27/2018	2/26/2023
Bertch Cabinet, LLC	Jesup	92-6884	10-02-008	01-TV-003R3	3/26/2019	3/25/2024
Bertch Cabinet, LLC	Oelwein	92-6863	33-01-020	99-TV-051R3	1/2/2018	1/1/2023
Bertch Cabinet, LLC	Waterloo	92-0468	07-01-063	03-TV-009R3	9/15/2020	9/14/2025
Bertch Cabinet, LLC	Waterloo	92-0712	07-01-086	03-TV-026R3	4/6/2020	4/5/2025
Big River Resources West Burlington, LLC	West Burlington	92-7013	29-02-012	09-TV-005R1-M001	12/11/2019	8/15/2021
Big River United Energy, LLC - Dyersville	Dyersville	92-6957	28-12-001	14-TV-010R1	6/17/2019	6/16/2024
BioSpringer North America Corporation	Cedar Rapids	92-9063	57-01-226	12-TV-005R1	5/9/2017	5/8/2022

Facility Name	Site City	EQ #	Facility #	Permit #	Issued	Expiration
Black Hawk County Sanitary Landfill	Waterloo	92-6871	07-01-121	99-TV-054R3	6/1/2017	5/31/2022
BrandFX, LLC	Pocahontas	92-6923	76-01-014	06-TV-002R2-M001	10/15/2019	2/27/2023
BrandFX, LLC	Swea City	92-1990	55-03-004	99-TV-027R3	12/7/2015	12/6/2020
Bridgestone Americas Tire Operations	Des Moines	92-6246	77-01-022	05-TV-008R1	6/2/2016	6/1/2021
Bunge Corporation	Council Bluffs	92-6880	78-01-085	02-TV-017R2-M001	7/20/2016	4/17/2019
Cambrex Charles City, Inc.	Charles City	92-4536	34-01-015	15-TV-007	5/18/2020	6/3/2020
Cargill - Vitamin E	Eddyville	92-6901	68-09-005	04-TV-004R3	3/30/2021	3/29/2026
Cargill Soybean East Plant	Cedar Rapids	92-9015	57-01-003	99-TV-044R3	6/23/2017	6/22/2022
Cargill Soybean West Plant	Cedar Rapids	92-9010	57-01-002	07-TV-010R2	1/1/2020	12/31/2024
Cargill, Inc.	Cedar Rapids	92-9020	57-01-004	07-TV-006R2	6/19/2019	6/18/2024
Cargill, Inc. - Eddyville, IA	Eddyville	92-0752	68-09-001	06-TV-006	10/17/2006	10/16/2011
Cargill, Inc. - Fort Dodge	Fort Dodge	92-6615	94-01-080	17-TV-003-M001	11/1/2019	11/26/2022
Cargill, Inc. - Iowa Falls	Iowa Falls	92-0760	42-01-003	99-TV-050R4	7/6/2020	7/5/2025
Cargill, Inc. - Sioux City	Sioux City	92-0769	97-01-001	99-TV-013R4	1/13/2020	1/12/2025
CB&I LLC.	Clive	92-6752	77-10-002	01-TV-011R3	12/7/2020	12/6/2025
CDI, LLC - Charles City	Charles City	92-6921	34-01-035	14-TV-012R1	5/20/2019	5/19/2024
CDI, LLC - Forest City	Forest City	92-6912	95-01-012	06-TV-004R2	9/1/2017	8/31/2022
Cedar Falls Municipal Electric Utility	Cedar Falls	92-0815	07-02-005	98-TV-005R2	10/15/2013	10/15/2018
Cedar Falls Municipal Electric Utility - CTS	Cedar Falls	92-5630	07-02-005	01-TV-006R3	7/8/2019	7/7/2024
Cedar Falls Municipal Water Utility	Cedar Falls	92-6822	07-02-005	11-TV-006R1	7/25/2016	7/24/2021
Cedar Rapids Linn County Solid Waste Agenc	Marion	92-9984	57-01-130	12-TV-006R1	6/23/2017	6/22/2022
Cedar Rapids WPCF	Cedar Rapids	92-9044	57-01-077	05-TV-001R2	6/14/2019	6/13/2024
Central Disposal Systems, Inc.	Lake Mills	92-6854	95-02-012	02-TV-020R3	9/23/2019	9/22/2024
Central Iowa Power Coop/Summit Lake Facilit	Creston	92-0871	88-01-004	99-TV-003R3	4/13/2017	4/12/2022
Central Iowa Renewable Energy (CORN) LP	Goldfield	92-3132	99-05-003	10-TV-004R2	6/15/2020	6/14/2025
CertainTeed Gypsum	Fort Dodge	92-0844	94-01-002	99-TV-028R3	8/21/2019	8/20/2024
CF Industries Nitrogen, LLC - Port Neal Nitrog	Sergeant Bluff	92-4988	97-01-030	99-TV-024R3	11/17/2015	11/16/2020
City of Ames Combustion Turbine Station	Ames	92-5831	85-01-006	99-TV-022R3	12/13/2016	12/12/2021
City of Ames Steam Electric Plant	Ames	92-0224	85-01-006	97-TV-008R3	5/16/2018	5/15/2023
City of Shenandoah - Shenandoah Sanitation, I	Shenandoah	92-6814	73-01-026	11-TV-002R2	3/16/2021	3/15/2026
Climax Molybdenum Company	Fort Madison	92-0970	56-02-021	03-TV-001R2	6/14/2016	6/13/2021
Clow Valve Company - Foundry	Oskaloosa	92-3484	62-01-001	10-TV-002R1-M001	7/1/2021	12/6/2020
Clow Valve Company - Machine Shop	Oskaloosa	92-0980	62-01-001	10-TV-003R2	5/13/2021	5/12/2026
CNH Industrial America LLC	Burlington	92-2802	29-01-006	02-TV-008R3	3/16/2021	3/15/2026
Construction Products, Inc.	Des Moines	92-1064	77-01-109	99-TV-006R3	7/26/2018	7/25/2023
Continental Cement Company - Davenport Pla	Buffalo	92-3093	82-04-005	04-TV-007R2	11/9/2017	11/8/2022
Corn Belt Power Coop/Wisdom Generation Sta	Spencer	92-1120	21-01-003	98-TV-002R3	7/16/2018	7/15/2023
CURRIES Division of AADG, Inc. - 12th Stree	Mason City	92-6755	17-01-087	00-TV-032R3	4/29/2019	4/28/2024

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Des Moines County Regional Sanitary Landfill	West Burlington	92-6898	29-02-010	18-TV-002	1/17/2018	1/16/2023
Des Moines Metropolitan Wastewater Reclama	Des Moines	92-6801	77-01-317	16-TV-007	6/30/2016	6/29/2021
Donaldson Company, Inc.	Cresco	92-1417	45-01-003	99-TV-043R3-M001	6/24/2019	9/5/2023
Dubuque Metropolitan Sanitary Landfill	Dubuque	92-6939	31-01-151	11-TV-003R2	5/13/2021	5/13/2021
Eagle Window & Door, Inc.	Dubuque	92-1510	31-01-061	03-TV-015R3	10/9/2018	10/8/2023
Eddyville Chlor-Alkali, LLC	Eddyville	92-6997	68-09-008	19-TV-004	8/5/2019	8/4/2024
Elite Octane, LLC	Atlantic	92-6985	15-01-042		9/11/2020	9/10/2025
Enterprise Products Operating LLC - Iowa City	Iowa City	92-5677	52-01-032	01-TV-007R3	5/6/2019	5/5/2024
Equistar Chemicals, LP	Clinton	92-4291	23-01-004	04-TV-008R2	4/25/2017	4/24/2022
Faircast, Inc.	Fairfield	92-1370	51-01-005	99-TV-058R3	3/23/2020	3/22/2025
Flint Hills Resources Fairbank, LLC	Fairbank	92-6958	10-04-007	15-TV-010R1	3/9/2020	3/8/2025
Flint Hills Resources Menlo, LLC	Menlo	92-6956	39-06-002	15-TV-006R1	3/23/2020	3/22/2025
Fres-co System USA, INC.	Red Oak	92-6928	69-01-020	07-TV-007R2	6/5/2018	6/4/2023
Gable Corporation	Council Bluffs	92-6982	78-01-121	16-TV-002-M001	8/17/2016	1/27/2021
Georgia-Pacific Gypsum LLC	Fort Dodge	92-2162	94-01-010	99-TV-035R2	7/6/2012	7/5/2017
Gerdau Ameristeel US Inc. - Wilton Mill	Wilton	92-3862	70-03-003	03-TV-006R2	8/8/2016	8/7/2021
GKN Armstrong Wheels	Armstrong	92-0281	32-02-004	99-TV-020R3	8/17/2016	8/16/2021
GKN Armstrong Wheels, Inc.	Estherville	92-6803	32-01-016	99-TV-019R3	3/21/2017	3/20/2022
GM Cereal Properties, Inc.	Cedar Rapids	92-9085	57-01-012	04-TV-016R2	6/27/2019	6/26/2024
Golden Grain Energy, LLC	Mason City	92-6927	17-01-100	09-TV-002R1	3/6/2017	3/5/2022
Grain Processing Corporation	Muscatine	92-2259	70-01-004	03-TV-029R1	3/13/2017	3/12/2022
Green Plains Shenandoah, LLC	Shenandoah	92-6961	36-10-001	13-TV-004R1	1/8/2019	1/7/2024
Green Plains Superior LLC	Superior	92-6954	30-08-002	13-TV-005R1-M001	10/14/2019	9/3/2023
Green Valley Chemical Corporation	Creston	92-2288	88-01-017	99-TV-002R4	12/26/2019	12/25/2024
Griffin Pipe Products CO., LLC d/b/a U.S. Pipe	Council Bluffs	92-2303	78-01-012	00-TV-016R1	6/21/2007	6/20/2012
GROWMARK, Inc - Fort Dodge Terminal	Duncombe	92-5492	94-07-001	97-TV-004R4-M001	8/19/2019	8/27/2023
Guardian Industries, LLC	Dewitt	92-6864	23-02-013	99-TV-059R3-M001	6/12/2020	9/25/2023
Guardian Industries, LLC	Dewitt	92-6864	23-02-013	99-TV-059R3-M001	6/12/2020	9/25/2023
Harsco Metals	Muscatine	92-2868	70-01-054	07-TV-008R2	4/27/2018	4/26/2023
Henniges Automotive Iowa, Inc.	Keokuk	92-4582	56-01-008	04-TV-015R2-M001	9/13/2017	8/27/2022
HNI Corporation - Central Campus	Muscatine	92-2531	70-01-006	02-TV-028R1	5/31/2018	5/30/2023
HNI Corporation - North Campus	Muscatine	92-2535	70-01-050	03-TV-032R1	6/26/2017	6/25/2022
Homeland Energy Solutions, LLC	Lawler	92-6930	19-04-002	14-TV-001R1	11/19/2018	11/18/2023
Indianola Municipal Utilities	Indianola	92-2656	91-01-002	13-TV-002R1	5/9/2018	5/8/2023
Indianola Water Pollution Control Department	Indianola	92-6949	91-01-015	13-TV-003R1	5/16/2018	5/15/2023
Industrial Energy Applications, Inc.	Cresco	92-6780	45-01-007	18-TV-006	9/6/2018	9/5/2023
Industrial Energy Applications, Inc. - Industrial	Postville	92-6769	03-02-007	21-TV-003	5/18/2021	5/18/2026
Industrial Energy Applications, Inc. - JBS USA	Marshalltown	92-6761	64-01-045	15-TV-002R1	1/13/2020	1/12/2025

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Industrial Laminates/Norplex, Inc.	Postville	92-3842	03-02-001	99-TV-039R3	12/9/2019	12/8/2024
Ingredion Incorporated	Cedar Rapids	92-9185	57-01-025	04-TV-001R2	1/1/2018	12/31/2022
International Paper - Cedar River Mill	Cedar Rapids	92-9025	57-01-153	15-TV-005-R1	5/1/2021	
Iowa Army Ammunition Plant	Middletown	92-3457	29-01-004	04-TV-019R2	7/1/2016	6/30/2021
Iowa City Sanitary Landfill	Iowa City	92-6853	52-01-053	00-TV-007R3	7/23/2018	7/22/2023
Iowa E.P.S. Products, Inc.	Des Moines	92-6998	77-01-337	21-TV-004	6/28/2021	6/27/2026
Iowa Fertilizer Company	Wever	92-6976	56-10-001	20-TV-001	2/10/2020	2/9/2025
Iowa State University	Ames	92-6867	85-01-007	04-TV-014R3	8/19/2020	4/21/2024
IPL - Burlington Generating Station	Burlington	92-2773	29-01-013	98-TV-023R3	6/4/2018	6/3/2023
IPL - Emery Generating Station	Clear Lake	92-6915	17-02-016	07-TV-011R2	8/22/2017	8/21/2022
IPL - Lansing Generating Station	Lansing	92-2686	03-03-001	98-TV-016R2	8/20/2018	8/19/2023
IPL - Lime Creek Combustion Turbines Station	Mason City	92-2687	17-01-066	98-TV-003R4	5/21/2019	5/20/2024
IPL - Marshalltown Generating Station	Marshalltown	92-6250	64-01-012	98-TV-010R3	5/9/2018	5/8/2023
IPL - Ottumwa Generating Station	Ottumwa	92-2774	90-07-001	98-TV-009R2-M002	10/31/2019	8/26/2023
IPL - Prairie Creek Generating Station	Cedar Rapids	92-9050	57-01-042	99-TV-010R2-M001	5/28/2019	2/19/2024
JBS USA LLC	Marshalltown	92-3662	64-01-015	15-TV-004R1	1/13/2020	1/12/2025
John Deere Coating Service Center	Waterloo	92-6873	07-01-111	99-TV-038R3	10/9/2020	10/8/2025
John Deere Davenport Works	Davenport	92-1314	82-01-043	01-TV-008R3-M001	6/27/2019	7/22/2023
John Deere Des Moines Works	Ankeny	92-6800	77-01-035	04-TV-017R2	8/17/2020	8/16/2025
John Deere Dubuque Works	Dubuque	92-1315	31-01-009	01-TV-021R2-M005	3/15/2017	6/8/2019
John Deere Engine Works	Waterloo	92-1318	07-01-091	04-TV-018R2-M001	7/25/2016	11/30/2020
John Deere Foundry Waterloo	Waterloo	92-1317	07-01-010	02-TV-012R2-M002	11/4/2019	2/12/2022
John Deere Ottumwa Works	Ottumwa	92-1316	90-01-003	03-TV-028R3	12/4/2019	12/3/2024
John Deere Product Engineering Center	Cedar Falls	92-5615	07-01-087	05-TV-004R2	3/11/2016	3/10/2021
John Deere Waterloo Works - Drive Train Oper	Waterloo	92-1319	07-01-077	03-TV-027R2-M001	4/13/2016	3/23/2021
John Deere Waterloo Works - Tractor & Cab A	Waterloo	92-5614	07-01-085	02-TV-024R2-M001	2/6/2018	4/18/2021
Keokuk Mills, LLC. (dba Keokuk Steel Casting	Keokuk	92-3000	56-01-025	04-TV-012R2-M001	9/12/2017	7/24/2021
Koch Fertilizer Ft. Dodge, LLC	Duncombe	92-1932	94-01-005	00-TV-010R3-M001	4/14/2017	10/20/2021
KraftHeinz - Muscatine	Muscatine	92-2344	70-01-005	01-TV-020R3	12/17/2019	12/16/2024
Landfill of North Iowa	Clear Lake	92-6941	17-02-024	12-TV-002R2	4/22/2021	4/21/2026
Latham Pool Products, Inc.	DeWitt	92-6989	23-02-028	19-TV-002	9/23/2019	9/22/2024
Lehigh Cement Company LLC	Mason City	92-3163	17-01-005	04-TV-011R2	5/19/2017	5/18/2022
Lincolnway Energy, LLC	Nevada	92-5064	85-02-017	14-TV-002R1	11/1/2018	10/31/2023
Linde Inc. - Fort Dodge, IA Carbon Dioxide Pla	Duncombe	92-6929	94-07-004	08-TV-002R2	6/20/2018	6/19/2023
Linwood Mining & Minerals Corporation	Davenport	92-3207	82-01-015	04-TV-005R2	9/3/2019	9/2/2024
Little Sioux Corn Processors, LLC	Marcus	92-7002	18-02-006	10-TV-005R1-M001	10/19/2016	7/18/2021
Loess Hills Regional Sanitary Landfill	Malvern	92-6986	65-02-005	17-TV-001	4/7/2017	4/6/2022
LOPAREX LLC	Iowa City	92-2346	52-01-037	01-TV-005R2	11/16/2020	6/12/2021

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Magellan Pipeline Company, L.P. - Des Moines	Pleasant Hill	92-6788	77-01-114	98-TV-019R3	5/23/2019	5/22/2024
Magellan Pipeline Company, L.P. - Dubuque	Dubuque	92-5491	31-01-034	03-TV-003R3	8/6/2019	8/5/2024
Magellan Pipeline Company, L.P. - Iowa City	Coralville	92-5490	52-02-006	03-TV-010R3	8/6/2019	8/5/2024
Magellan Pipeline Company, L.P. - Mason City	Clear Lake	92-5489	17-02-002	98-TV-006R3	11/30/2020	11/8/2020
Magellan Pipeline Company, L.P. - Milford	Milford	92-5493	30-02-004	03-TV-004R3-M001	7/2/2020	8/5/2024
Magellan Pipeline Company, L.P. - Sioux City	Sioux City	92-5494	97-01-118	98-TV-018R3	10/14/2016	10/13/2021
Magellan Pipeline Company, L.P. - Waterloo	Waterloo	92-5495	07-01-040	97-TV-005R3	10/5/2015	10/4/2020
Manly Terminal LLC	Manly	92-6614	98-02-004	09-TV-004R2	9/28/2020	9/27/2025
Maquoketa Municipal Electric Utility	Maquoketa	92-3383	49-01-013	04-TV-009R3	2/19/2020	2/18/2025
MasterBrand Cabinets Waterloo Operations	Waterloo	92-3949	07-01-061	00-TV-055R3	12/21/2020	3/31/2024
MetoKote Corporation - Plant 15	Cedar Falls	92-6834	07-02-023	99-TV-032R3	10/31/2017	10/30/2022
Metro Methane Recovery Facility	Mitchellville	92-6791	77-14-002	03-TV-005R2	11/30/2016	11/29/2021
Metro Park East Landfill	Mitchellville	92-6849	77-14-003	03-TV-033R2	7/5/2017	7/4/2022
MidAmerican Energy Co. - Coralville Turbines	Coralville	92-2728	52-02-001	00-TV-015R3	8/8/2016	8/7/2021
MidAmerican Energy Co. - Electriform Turbin	Waterloo	92-5852	07-01-038	99-TV-034R3	8/15/2016	8/14/2021
MidAmerican Energy Co. - George Neal North	Sergeant Bluff	92-2761	97-04-010	97-TV-002R3	5/15/2018	5/14/2023
MidAmerican Energy Co. - George Neal South	Salix	92-3599	97-04-011	97-TV-003R3-M001	5/20/2019	5/22/2023
MidAmerican Energy Co. - Knoxville Power St	Knoxville	92-6889	63-01-017	01-TV-028R2 M002	10/9/2018	8/18/2018
MidAmerican Energy Co. - Louisa Station	Muscatine	92-2730	58-07-001	98-TV-029R3-M001	9/12/2018	8/7/2023
MidAmerican Energy Co. - Merl Parr CTs	Charles City	92-5851	34-01-023	98-TV-033R3	5/2/2016	5/1/2021
MidAmerican Energy Co. - Pleasant Hill CTs/	Pleasant Hill	92-5848	77-13-002	97-TV-006R3	11/10/2020	11/9/2025
MidAmerican Energy Co. - River Hills Turbine	Des Moines	92-5850	77-01-054	98-TV-015R3	5/16/2018	5/15/2023
MidAmerican Energy Co. - Riverside Station	Bettendorf	92-2692	82-02-006	98-TV-004R3	9/26/2018	9/25/2023
MidAmerican Energy Co. - Shenandoah Power	Shenandoah	92-6888	73-01-018	01-TV-024R3	8/1/2018	7/31/2023
MidAmerican Energy Co. - Sycamore Turbines	Johnston	92-5849	77-09-002	98-TV-014R3	4/3/2018	4/2/2023
MidAmerican Energy Co. - Walter Scott Jr. En	Council Bluffs	92-3600	78-01-026	97-TV-001R3	4/19/2018	4/18/2023
MidAmerican Energy Co. - Waterloo Lundquis	Waterloo	92-6887	07-01-133	01-TV-027R2	10/3/2018	8/18/2018
Muscatine Power & Water	Muscatine	92-3726	70-01-011	98-TV-021R4	2/11/2021	2/10/2021
National Centers for Animal Health	Ames	92-5201	85-01-017	02-TV-001R3	9/26/2019	9/25/2024
Natural Gas Pipeline Co. of America/Station 10	Emerson	92-3763	65-04-001	99-TV-012R4	4/13/2020	4/12/2025
Natural Gas Pipeline Co. of America/Station 10	Truro	92-3765	91-06-001	00-TV-003R3	7/5/2016	7/4/2021
Natural Gas Pipeline Co. of America/Station 10	Harper	92-3764	54-10-001	00-TV-049R3	4/10/2018	4/9/2023
Natural Gas Pipeline Co. of America/Station 19	Knoxville	92-6302	63-01-013	99-TV-048R4	12/9/2020	12/8/2025
Natural Gas Pipeline Co. of America/Station 19	Letts	92-6043	58-04-002	00-TV-006R4	2/22/2021	2/21/2026
Natural Gas Pipeline Co. of America/Station 20	Columbus Junction	92-3762	58-02-007	00-TV-024R3	8/17/2020	9/6/2022
Natural Gas Pipeline Co. of America/Station 20	Keota	92-5624	92-10-001	00-TV-048R3	8/8/2018	8/7/2023
Naturally Recycled Proteins of Iowa, LLC	Steamboat Rock	92-6945	42-08-003	12-TV-004R1	8/15/2016	8/14/2021
Nichols Aluminum - Davenport Rolling	Davenport	92-3824	82-01-017	00-TV-060R3	8/19/2019	8/18/2024

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Nichols Aluminum, LLC - Davenport Casting	Davenport	92-4290	82-01-089	03-TV-017R2	2/3/2016	2/2/2021
North Central Iowa Regional Solid Waste Agen	Fort Dodge	92-6846	94-01-079	20-TV-002	4/6/2020	4/5/2025
Northern Natural Gas Company - Oakland	Oakland	92-3874	78-04-006	98-TV-017R4	6/22/2020	8/23/2024
Northern Natural Gas Company - Oakland	Oakland	92-3874	78-04-006	98-TV-017R4	6/22/2020	8/23/2024
Northern Natural Gas Company - Ogden	Ogden	92-3875	08-03-004	98-TV-028R3-M001	4/6/2021	2/24/2021
Northern Natural Gas Company - Paullina	Paullina	92-3876	18-06-002	99-TV-011R3	10/17/2017	10/16/2022
Northern Natural Gas Company - Redfield	Redfield	92-3879	25-05-002	00-TV-014R3-M001	7/25/2018	6/7/2023
Northern Natural Gas Company - Ventura	Garner	92-3873	41-02-005	00-TV-044R3	7/11/2017	7/10/2022
Northern Natural Gas Company - Waterloo	Waterloo	92-3877	07-01-057	01-TV-016R3-M002	10/9/2019	5/22/2023
NSK Clarinda	Clarinda	92-3910	73-02-010	12-TV-007R1	9/25/2017	9/24/2022
NuStar Council Bluffs Terminal	Council Bluffs	92-3761	78-01-092	99-TV-040R3	6/8/2017	6/7/2022
NuStar Le Mars Terminal	Le Mars	92-2944	75-01-018	00-TV-011R3-M001	1/4/2017	12/18/2021
NuStar Milford Terminal	Milford	92-2945	30-02-010	00-TV-012R3	12/27/2016	12/26/2021
NuStar Rock Rapids Terminal	Rock Rapids	92-2946	60-01-012	00-TV-013R3	1/9/2017	1/8/2022
OSI Industries, LLC	Oakland	92-6979	78-04-001	16-TV-001	1/14/2016	1/13/2021
Pella Corporation - Pella Division	Pella	92-4047	63-02-003	00-TV-030R3	3/6/2018	3/5/2023
Pella West Substation	Pella	92-6893	63-02-023	98-TV-011R3	4/28/2016	4/27/2021
Pine Lake Corn Processors	Steamboat Rock	92-6962	42-08-001	19-TV-001	7/15/2019	7/14/2024
PMX Industries Inc.	Cedar Rapids	92-9186	57-01-095	02-TV-022R3	5/16/2018	5/15/2023
POET Biorefining - Arthur, LLC	Arthur	92-6807	47-04-001	10-TV-008R1-M002	3/29/2017	10/25/2020
POET Biorefining - Coon Rapids, LLC	Coon Rapids	92-6922	39-11-001	07-TV-001R2-M002	10/4/2019	8/6/2022
POET Biorefining - Corning	Corning	92-6966	02-05-001	14-TV-007R1	3/25/2019	3/24/2024
POET Biorefining - Emmetsburg	Emmetsburg	92-6932	74-01-022	14-TV-003R1	4/1/2019	3/31/2024
POET Biorefining - Gowrie	Gowrie	92-6963	94-02-004	18-TV-008-M001	7/22/2019	12/2/2023
POET Biorefining - Hanlontown	Hanlontown	92-6964	98-07-004	21-TV-001	2/11/2021	2/10/2026
POET Biorefining - Iowa Falls, LLC	Iowa Falls	92-6959	42-01-019	19-TV-005	9/10/2019	9/9/2024
POET Biorefining - Jewell, LLC	Jewell	92-6943	40-02-002	18-TV-004-M001	8/26/2019	5/29/2023
POET Biorefining - Shell Rock, LLC	Shell Rock	92-6960	12-04-007	15-TV-003R1	3/2/2020	3/1/2025
Polaris Industries, Inc.	Spirit Lake	92-6845	30-01-012	00-TV-023R3-M002	9/20/2017	9/29/2021
Praxis Mid America	Ottumwa	92-5186	90-01-023	00-TV-038R1	5/4/2007	5/3/2012
Precision Tank & Equipment Company	Humboldt	92-6980	46-01-034	15-TV-011-R1	11/4/2020	
Principal Life Insurance Company	Des Moines	92-6877	77-01-174	02-TV-019R2	6/2/2016	6/1/2021
Quaker Manufacturing LLC	Cedar Rapids	92-9200	57-01-027	03-TV-022R2	6/30/2021	10/31/2020
Quality Manufacturing Corporation	Urbandale	92-6975	77-03-014	14-TV-013-R1	5/6/2020	
Ram Development	Portable	92-6984	PP183-000	18-TV-005-M001	6/18/2019	6/10/2023
Red Star Yeast Company, LLC	Cedar Rapids	92-6919	57-01-226	10-TV-006R1	9/30/2020	9/29/2020
Riley Industrial Painting	West Burlington	92-2813	29-01-079	00-TV-021R3	4/3/2018	4/2/2023
Robertson Ceco II dba Star Building Systems	Monticello	92-4432	53-02-008	00-TV-037R3	6/18/2018	6/17/2023

Facility Name	Site City	EQ #	Facility #	Permit #	Issued	Expiration
Roquette America, Inc.	Keokuk	92-2568	56-01-009	08-TV-006R1	9/27/2016	9/26/2021
Scott County Landfill	Davenport	92-6872	82-01-121	02-TV-003R3	11/12/2019	11/11/2024
Siculus, Inc.	Altoona	92-6988	77-07-010	18-TV-007	10/29/2018	10/28/2023
Siegwerk USA Co. - 129 SE 18th St	Des Moines	92-5668	77-01-169	03-TV-023R2	3/23/2017	3/22/2022
Siegwerk USA Co. - SW 56th St.	Des Moines	92-6987	77-01-285	18-TV-001	1/18/2018	1/17/2023
Siemens Gamesa Renewable Energy, Inc.	Fort Madison	92-6809	56-02-053	11-TV-001R2	2/22/2021	2/21/2026
Silgan Containers Mfg. Corp. - Fort Dodge	Fort Dodge	92-4664	94-01-040	00-TV-035R3	4/9/2018	4/8/2023
Silgan Containers Mfg. Corp. - Fort Madison	Fort Madison	92-4665	56-02-030	00-TV-036R3	12/21/2017	12/20/2022
Sivyer Steel Castings LLC	Bettendorf	92-4700	82-02-004	02-TV-015R1	4/1/2014	3/31/2019
Smithfield Fresh Meats Corp.	Denison	92-1927	24-01-001	20-TV-003	4/27/2020	4/26/2025
Smithfield Packaged Meats Corp - Sioux City,	Sioux City	92-1228	97-01-193	16-TV-003-M001	9/15/2016	4/12/2021
Southwest Iowa Renewable Energy	Council Bluffs	92-6062	78-01-110	14-TV-014R1	10/29/2019	10/28/2024
SSAB Iowa Inc.	Muscatine	92-6869	70-08-002	07-TV-004R2	4/20/2018	4/19/2023
Stellar Industries, Inc. - Garner Plant	Garner	92-4819	41-02-011	01-TV-009R3	6/30/2020	9/30/2023
Tama Paperboard, LLC	Tama	92-3992	86-01-001	00-TV-051R3	3/21/2018	3/20/2023
The Andersons Marathon Holdings, LLC	Denison	92-4602	24-01-007	14-TV-011R1	7/29/2019	7/28/2024
Titan Tire Corporation	Des Moines	92-6802	77-01-003	02-TV-013R2	4/14/2016	4/13/2021
Transco Railway Products Inc.	Oelwein	92-6832	33-01-016	18-TV-003	5/11/2018	5/10/2023
Union Tank Car Co.-Muscatine	Muscatine	92-5154	70-01-048	03-TV-002R3	10/19/2020	10/18/2025
United States Gypsum Company	Fort Dodge	92-5175	94-01-017	03-TV-019R3	12/28/2020	12/27/2025
United States Gypsum Company	Mediapolis	92-5176	29-06-001	03-TV-012R3	5/11/2021	5/11/2026
University of Iowa	Iowa City	92-6571	52-01-005	00-TV-002R3	8/21/2020	8/20/2025
University of Northern Iowa - Main Campus	Cedar Falls	92-5628	07-02-006	02-TV-016R3	7/9/2019	7/8/2024
University of Northern Iowa - Power Plant	Cedar Falls	92-5192	07-02-006	04-TV-022R2	6/20/2018	6/19/2023
Unverferth Manufacturing Co. Inc.	Shell Rock	92-5194	12-04-005	00-TV-022R3	3/25/2019	3/24/2024
Valero Albert City Plant	Albert City	92-6951	11-05-004	16-TV-006	5/9/2016	5/8/2021
Valero Charles City Plant	Charles City	92-6933	34-01-040	15-TV-009R1	5/4/2020	5/3/2025
Valero Fort Dodge Plant	Fort Dodge	92-6952	94-01-073	16-TV-005	4/26/2016	4/25/2021
Valero Hartley Plant	Hartley	92-6953	71-02-010	16-TV-004	4/19/2016	4/18/2021
Valero Renewable Fuels Company. LLC d/b/a	Lakota	92-6852	55-09-003	10-TV-001R1-M003	4/25/2017	8/5/2020
Vantage Corn Processors LLC	Cedar Rapids	92-9080	57-01-246	08-TV-007R1-M001	1/1/2020	
Veolia Water NA - Davenport	Bettendorf	92-5810	82-02-052	10-TV-007R2	3/30/2021	3/29/2026
Vermeer Corporation	Pella	92-5246	63-02-004	99-TV-052R3	6/11/2019	6/10/2024
Wacker Chemical Corporation	Eddyville	92-6917	68-09-006	05-TV-003R2	3/8/2016	3/7/2021
Waverly Municipal Electric Utility dba Waverl	Waverly	92-5348	09-01-013	05-TV-006R2	3/13/2017	3/12/2022
WDC Acquisition LLC	Creston	92-5380	88-01-002	99-TV-018R3	8/22/2017	8/21/2022
Webster City Combustion Turbine	Webster City	92-5367	40-01-003	98-TV-020R4	6/3/2019	6/2/2024
Western Minnesota Municipal Power Agency -	Brayton	92-6920	05-04-002	06-TV-003R2	5/2/2017	5/1/2022

Facility Name	Site City	EQ #	Facility #	Permit #	Issued	Expiration
Winnebago Industries, Inc. - Charles City	Charles City	92-6914	34-01-027	08-TV-003R2	5/20/2019	5/19/2024
Winnebago Industries, Inc. - Forest City	Forest City	92-5528	95-01-001	05-TV-002R2-M001	8/8/2017	4/20/2021
Woodharbor Custom Cabinetry	Mason City	92-6876	17-01-068	00-TV-027R3-M001	10/30/2020	11/24/2024
Xerxes Corporation	Tipton	92-5586	16-01-004	99-TV-049R3	6/26/2017	6/25/2022
ZFS Creston, LLC	Creston	92-6881	88-01-021	03-TV-016R1	5/15/2012	5/14/2017

**Iowa Department of Natural Resources
Title V Operating Permit**

Name of Permitted Facility: Vermeer Manufacturing Co.

**Facility Location: Plant 3.5
1610 Vermeer Road East
Pella, IA 50219**

Air Quality Operating Permit Number: 99-TV-052

Expiration Date: October 18, 2004

**EIQ Number:92-5246
Facility File Number:63-02-004**

Responsible Official

**Name: Terry Butler
Title: Vice President of Facilities
Mailing Address: Plant 3.5
1610 Vermeer Road East
Pella, IA 50219
Phone #: (515) 621-7762**

Permit Contact Person for the Facility

**Name: Terry Butler
Title: Vice President of Facilities
Mailing Address: Plant 3.5
1610 Vermeer Road East
Pella, IA 50219
Phone #: (515) 621-7762**

This permit is issued in accordance with 567 Iowa Administrative Code Chapter 22, and is issued subject to the terms and conditions contained in this permit.

For the Director of the Department of Natural Resources

Christine Spackman, Supervisor of Air Operating Permits Section

Date

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V. Appendix: State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542, District Court, Marion County, Law No. LACV087889

Abbreviation

acfm.....	actual cubic feet per minute
CFR.....	Code of Federal Regulations
°F.....	degrees Fahrenheit
EQ.....	emissions inventory questionnaire
gr./dscf.....	grains per dry standard cubic foot
gr./100 cf.....	grains per one hundred cubic feet
IAC.....	Iowa Administrative Code
Iowa DNR.....	Iowa Department of Natural Resources
LPG.....	Liquified Petroleum Gas (Propane)
MMcf.....	Million cubic feet
MSDS.....	Material Safety Data Sheet
MVAC.....	Motor Vehicle Air Conditioner
NAAQS.....	National Ambient Air Quality Standard
NSPS.....	New Source Performance Standard
PSD.....	Prevention of Significant Deterioration
ppm.....	parts per million
ppmv.....	parts per million by volume
lb./hr.....	pounds per hour
lb./MMBtu.....	pounds per million British thermal units
SEP.....	Supplemental Environmental Project
TPY.....	Tons per year
USEPA.....	United States Environmental Protection Agency

Pollutants

PM ₁₀	particulate matter less than ten (10) microns in size
PM.....	particulate matter (same as TSP, Total Suspended Particulate)
SO ₂	sulfur dioxide
NO _x	nitrogen oxide
VOC.....	volatile organic compound
CO.....	carbon monoxide
HAP.....	hazardous air pollutant

I. Facility Description and Equipment List

Facility Name: Vermeer Manufacturing Co.

Permit Number: 99-TV-052

Facility Description: Manufacturer of Farm Machinery and Equipment and Construction Equipment

Equipment List

Emission Point Number	Associated Emission Unit Number (s)	Associated Emission Unit Description
1.AA	1.AA	Non-Production Heating Unit
1.AC	1.AC	Non-Production Heating Unit
1.AD	1.AD	Non-Production Heating Unit
1.AF	1.AF	Non-Production Heating Unit
1.AG1	1.AG	Plant 1 Finish Paint Booth
1.AG2	1.AG	Plant 1 Finish Paint Booth
1.AH	1.AH	Production Engine Testing Unit
1.AJ	1.AJ	Production Engine Testing Unit
1.AP	1.AP	Paint Kitchen
1.AQ	1.AQ1	Paint Kitchen
1.AQ	1.AQ2	Paint Kitchen
1.AR	1.AR	Production Engine Testing Unit
1.AS	1.AS	Production Engine Testing Unit
1.AT	1.AT	Production Engine Testing Unit
1.AU	1.AU	Production Engine Testing Unit
1.C	1.C	Non-Production Heating Unit
1.D	1.D	Hot Water Heater
1.FLAME1	1.FLAME1	Plant 1 Flamecutting Unit (Fugitive)
1.FLAME2	1.FLAME2	Plant 1 Flamecutting Unit (Fugitive)
1.J	1.J	Plant 1 Paint Oven
1.K	1.K	Plant 1 Parts Paint Booth
1.O	1.O	Non-Production Heating Unit
1.PLASMA1	1.PLASMA1	Plant 1 Plasmacutter (Fugitive)
1.PRTWSH	1.PRTWSH	Five (5) Safety Kleen Parts Washers (Fugitive)
1.T	1.T	Steel Shot Metal Blast Booth
1.TORCH	1.TORCH	Nine (9) Torchcutting Units (Fugitive)
1.U	1.U	Hot Water Heater
1.V	1.V	Non-Production Heating Unit
1.WELDING	1.WELDING	37 Gas-Metal Arc Welders (Fugitive)
1.WELDPLS	1.WELDPLS	19 Pulse Current Gas-Metal Arc Welders (Fugitive)

Equipment List (continued)

Emission Point Number	Associated Emission Unit Number (s)	Associated Emission Unit Description
1.Y	1.Y	Non-Production Heating Unit
2.AB	2.AB	Production Engine Testing Unit
2.AF	2.AF1	Paint Kitchen
2.AF	2.AF2	Paint Kitchen
2.AG	2.AG	Paint Kitchen
2.AI1	2.AI	Plant 2 Finish Paint Booth
2.AI2	2.AI	Plant 2 Finish Paint Booth
2.AJ	2.AJ	Plant 2 Finish Paint Booth Air Intake Heater
2.B	2.B	Non-Production Heating Unit
2.E	2.E	Production Engine Testing Unit
2.F1	2.F	Plant 2 Finish Paint Booth
2.F2	2.F	Plant 2 Finish Paint Booth
2.FLAME1	2.FLAME1	Plant 2 Flamecutting Unit (Fugitive)
2.FLAME2	2.FLAME2	Plant 2 Flamecutting Unit (Fugitive)
2.G	2.G	Production Engine Testing Unit
2.H	2.H	Plant 2 Parts Paint Booth
2.I	2.I	Plant 2 Paint Oven
2.J	2.J	Production Engine Testing Unit
2.P	2.P	Non-Production Heating Unit
2.PLASMA1	2.PLASMA1	Plant 2 Plasmacutter (Fugitive)
2.PLASMA2	2.PLASMA2	Plant 2 Plasmacutter (Fugitive)
2.PLASMA3	2.PLASMA3	Plant 2 Whitney Plasmacutter (Fugitive)
2.PLASMA4	2.PLASMA4	Plant 2 Whitney Plasmacutter (Fugitive)
2.PLASMA5	2.PLASMA5	Plant 2 Whitney Plasmacutter (Fugitive)
2.PRTWSH	2.PRTWSH	Four (4) Safety Kleen Parts Washers (Fugitive)
2.Q	2.Q	Hot Water Heater
2.T	2.T	Non-Production Heating Unit
2.TORCH	2.TORCH	Nine (9) Torchcutting Units (Fugitive)
2.V1	2.V1	Non-Production Heating Unit
2.V2	2.V2	Non-Production Heating Unit
2.WELDING	2.WELDING	45 Gas-Metal Arc Welders (Fugitive)
2.WELDPLS	2.WELDPLS	8 Pulse Current Gas-Metal Arc Welders (Fugitive)
2.X	2.X	Non-Production Heating Unit
2.Y1	2.Y1	Non-Production Heating Unit
3.A1	3.A1	Production Engine Testing Unit
3.A2	3.A2	Production Engine Testing Unit
3.AA	3.AA	Metal Parts Preheating Oven

Equipment List (continued)

Emission Point Number	Associated Emission Unit Number (s)	Associated Emission Unit Description
3.B	3.B	Plant 3 Finish Paint Oven
3.BB	3.BB	Non-Production Heating Unit
3.C	3.C	Non-Production Heating Unit
3.D1	3.D1	Production Engine Testing Unit
3.D2	3.D2	Production Engine Testing Unit
3.D3	3.D3	Production Engine Testing Unit
3.EE	3.EE	Non-Production Heating Unit
3.F1	3.F1	Plant 3 Finish Paint Booth
3.F2	3.F2	Plant 3 Finish Paint Booth
3.FLAME1	3.FLAME1	Plant 3 Flamecutting Unit (Fugitive)
3.FLAME2	3.FLAME2	Plant 3 Flamecutting Unit (Fugitive)
3.FLAME3	3.FLAME3	Plant 3 Flamecutting Unit (Fugitive)
3.FLAME4	3.FLAME4	Plant 3 Flamecutting Unit (Fugitive)
3.FLAME5	3.FLAME5	Plant 3 Flamecutting Unit (Fugitive)
3.G	3.G	Plant 3 Parts Paint Booth
3.GG	3.GG	Non-Production Heating Unit
3.GH	3.GH	Paint Kitchen
3.GI	3.GI	Paint Kitchen
3.H	3.H	Hot Water Heater
3.HH	3.HH	Plant 3 Paint Booth
3.I	3.I	Plant 3 Paint Oven
3.II	3.II	Plant 3 Paint Booth
3.JJ	3.JJ	Plant 3 Paint Oven
3.KK	3.KK	Paint Kitchen
3.M	3.M	Hot Water Heater
3.N2	3.N2	Non-Production Heating Unit
3.P	3.P	Non-Production Heating Unit
3.PLASMA1	3.PLASMA1	Plant 3 Plasmacutter (Fugitive)
3.PLASMA2	3.PLASMA2	Plant 3 Plasmacutter (Fugitive)
3.PLASMA3	3.PLASMA3	Plant 3 Plasmacutter (Fugitive)
3.PLASMA4	3.PLASMA4	Plant 3 Whitney Plasmacutter (Fugitive)
3.PLASMA5	3.PLASMA5	Plant 3 Whitney Plasmacutter (Fugitive)
3.PLASMA6	3.PLASMA6	Plant 3 Whitney Plasmacutter (Fugitive)
3.PRTWSH	3.PRTWSH	Three (3) Safety Kleen Parts Washers (Fugitive)
3.S	3.S	Production Engine Testing Unit
3.T	3.T	Non-Production Heating Unit

Equipment List (continued)

Emission Point Number	Associated Emission Unit Number (s)	Associated Emission Unit Description
3.TORCH	3.TORCH	Seventeen (17) Torchcutting Units (Fugitive)
3.W	3.W	Non-Production Heating Unit
3.WELDING	3.WELDING	64 Gas-Metal Arc Welders (Fugitive)
3.WELDPLS	3.WELDPLS	16 Pulse Current Gas-Metal Arc Welders (Fugitive)
3.X1	3.X1	Non-Production Heating Unit
3.X2	3.X2	Non-Production Heating Unit
3.Y1	3.Y1	Non-Production Heating Unit
3.Z	3.Z	Production Engine Testing Unit
4.A1	4.A1	Non-Production Heating Unit
4.A2	4.A2	Non-Production Heating Unit
4.A3	4.A3	Non-Production Heating Unit
4.AA	4.AA	Non-Production Heating Unit
4.BB	4.BB	Non-Production Heating Unit
4.CD	4.CD	Paint Kitchen
4.CE	4.CE1	Paint Kitchen
4.CE	4.CE2	Paint Kitchen
4.D	4.D	Hot Water Heater
4.E	4.E	Plant 4 Paint Oven
4.F	4.F	Plant 4 Parts Paint Booth
4.FLAME1	4.FLAME1	Plant 4 Flamecutting Unit (Fugitive)
4.FLAME2	4.FLAME2	Plant 4 Flamecutting Unit (Fugitive)
4.FLAME3	4.FLAME3	Plant 4 Flamecutting Unit (Fugitive)
4.G1	4.G	Plant 4 Finish Paint Booth
4.G2	4.G	Plant 4 Finish Paint Booth
4.H2	4.H2	Non-Production Heating Unit
4.I	4.I	Production Engine Testing Unit
4.J	4.J	Production Engine Testing Unit
4.K2	4.K2	Non-Production Heating Unit
4.L	4.L	Non-Production Heating Unit
4.LASER	4.LASER	Plant 4 Lasercutting Unit (Fugitive)
4.PLASMA1	4.PLASMA1	Plant 4 Plasmacutter (Fugitive)
4.PLASMA2	4.PLASMA2	Plant 4 Plasmacutter (Fugitive)
4.PLASMA3	4.PLASMA3	Plant 4 Plasmacutter (Fugitive)
4.PLASMA4	4.PLASMA4	Plant 4 Whitney Plasmacutter (Fugitive)
4.PLASMA5	4.PLASMA5	Plant 4 Whitney Plasmacutter (Fugitive)
4.PRTWSH	4.PRTWSH	Seven (7) Safety Kleen Parts Washers (Fugitive)
4.R	4.R	Non-Production Heating Unit

Equipment List (continued)

Emission Point Number	Associated Emission Unit Number (s)	Associated Emission Unit Description
4.S	4.S	Production Engine Testing Unit
4.T	4.T	Non-Production Heating Unit
4.TORCH	4.TORCH	Thirteen (13) Torchcutting Units (Fugitive)
4.WELDING	4.WELDING	66 Gas-Metal Arc Welders (Fugitive)
4.WELDPLS	4.WELDPLS	30 Pulse Current Gas-Metal Arc Welders (Fugitive)
4.Z	4.Z	Hot Water Heater
5.A	5.A	Non-Production Heating Unit
5.AA	5.AA	Non-Production Heating Unit
5.B1	5.B1	Non-Production Heating Unit
5.B2	5.B2	Non-Production Heating Unit
5.BB	5.BB1	Paint Kitchen
5.BB	5.BB2	Paint Kitchen
5.CC	5.CC1	Paint Kitchen
5.CC	5.CC2	Paint Kitchen
5.DD	5.DD	Paint Kitchen
5.E	5.E	Hot Water Heater
5.EE	5.EE	Non-Production Heating Unit
5.FF	5.FF	Non-Production Heating Unit
5.FLAME1	5.FLAME1	Plant 5 Flamecutting Unit (Fugitive)
5.G1	5.G	Plant 5 Finish Paint Booth
5.G2	5.G	Plant 5 Finish Paint Booth
5.GG	5.GG	Non-Production Heating Unit
5.H	5.H	Non-Production Heating Unit
5.HH	5.HH	Non-Production Heating Unit
5.I	5.I	Plant 5 Paint Oven
5.II	5.II	Non-Production Heating Unit
5.J	5.J	Plant 5 Parts Paint Booth
5.K	5.K	Non-Production Heating Unit
5.M	5.M	Non-Production Heating Unit
5.N	5.N	Production Engine Testing Unit
5.PLASMA1	5.PLASMA1	Plant 5 Plasmacutter (Fugitive)
5.PLASMA2	5.PLASMA2	Plant 5 Plasmacutter (Fugitive)
5.PLASMA3	5.PLASMA3	Plant 5 Whitney Plasmacutter (Fugitive)
5.PLASMA4	5.PLASMA4	Plant 5 Whitney Plasmacutter (Fugitive)
5.PRTWSH	5.PRTWSH	Two (2) Safety Kleen Parts Washers (Fugitive)
5.R	5.R	Hot Water Heater
5.T	5.T	Production Engine Testing Unit

Equipment List (continued)

Emission Point Number	Associated Emission Unit Number (s)	Associated Emission Unit Description
5.TORCH	5.TORCH	Seven (7) Torchcutting Units (Fugitive)
5.W	5.W	Production Engine Testing Unit
5.WELDING	5.WELDING	62 Gas-Metal Arc Welders (Fugitive)
5.WELDPLS	5.WELDPLS	45 Pulse Current Gas-Metal Arc Welders (Fugitive)
6.AB	6.AB	Non-Production Heating Unit
6.AC	6.AC	Non-Production Heating Unit
6.AD	6.AD	Non-Production Heating Unit
6.AE	6.AE	Non-Production Heating Unit
6.AF	6.AF	Non-Production Heating Unit
6.AG	6.AG	Non-Production Heating Unit
6.C	6.C	Non-Production Heating Unit
6.D	6.D	Production Engine Testing Unit
6.DD	6.DD	Non-Production Heating Unit
6.F	6.F	Plant 6 Paint Oven
6.FF	6.FF	Paint Kitchen
6.GG	6.GG	Paint Kitchen
6.H	6.H	Hot Water Heater
6.HH	6.HH	Plant 6 Primer Paint Booth
6.JJ	6.JJ	Paint Booth Air Intake
6.K	6.K	Production Engine Testing Unit
6.KK	6.KK	Paint Booth Air Intake
6.L	6.L	Non-Production Heating Unit
6.LL	6.LL	Production Engine Testing Unit
6.M1	6.M1	Plant 6 Finish Paint Booth
6.M2	6.M2	Plant 6 Finish Paint Booth
6.MM	6.MM	Production Engine Testing Unit
6.N	6.N	Plant 6 Parts Paint Booth
6.PLASMA1	6.PLASMA1	Plant 6 Plasmacutter (Fugitive)
6.PRTWSH	6.PRTWSH	Two (2) Safety Kleen Parts Washers (Fugitive)
6.Q	6.Q	Hot Water Heater
6.QQ	6.QQ	Stage 1 Washer
6.R	6.R	Non-Production Heating Unit
6.RR	6.RR	Stage 1 Burner
6.S	6.S	Plant 6 Finish Paint Booth
6.SS	6.SS	Stage 3 Burner
6.T	6.T	Non-Production Heating Unit
6.TORCH	6.TORCH	Ten (10) Torchcutting Units (Fugitive)

Equipment List (continued)

Emission Point Number	Associated Emission Unit Number (s)	Associated Emission Unit Description
6.TT	6.TT	Stage 5 Burner
6.UU	6.UU	Stage 5 Washer
6.VV	6.VV	Paint Kitchen
6.W	6.W	Plant 6 Paint Oven
6.WW	6.WW	Paint Kitchen
6.WELDING	6.WELDING	19 Gas-Metal Arc Welders (Fugitive)
6.WELDPLS	6.WELDPLS	10 Pulse Current Gas-Metal Arc Welders (Fugitive)
6.XX	6.XX	Production Engine Testing Unit
7.B1	7.B1	Non-Production Heating Unit
7.B2	7.B2	Non-Production Heating Unit
7.B3	7.B3	Non-Production Heating Unit
7.B4	7.B4	Non-Production Heating Unit
7.D	7.D	Non-Production Heating Unit
7.FLAME1	7.FLAME1	Plant 7 Flamecutting Unit (Fugitive)
7.FLAME2	7.FLAME2	Plant 7 Flamecutting Unit (Fugitive)
7.FLAME3	7.FLAME3	Plant 7 Flamecutting Unit (Fugitive)
7.FLAME4	7.FLAME4	Plant 7 Flamecutting Unit (Fugitive)
7.FLAME5	7.FLAME5	Plant 7 Flamecutting Unit (Fugitive)
7.FLAME6	7.FLAME6	Plant 7 Flamecutting Unit (Fugitive)
7.G	7.G	Production Engine Testing Unit
7.H	7.H	Production Engine Testing Unit
7.I	7.I	Production Engine Testing Unit
7.K	7.K	Non-Production Heating Unit
7.L	7.L	Non-Production Heating Unit
7.LASER	7.LASER	Four (4) Plant 7 Lasercutting Units (Fugitive)
7.M	7.M	Non-Production Heating Unit
7.N	7.N	Non-Production Heating Unit
7.O	7.O	Non-Production Heating Unit
7.P	7.P	Non-Production Heating Unit
7.PLASMA1	7.PLASMA1	Plant 7 Plasmacutter (Fugitive)
7.PLASMA2	7.PLASMA2	Plant 7 Plasmacutter (Fugitive)
7.PLASMA3	7.PLASMA3	Plant 7 Plasmacutter (Fugitive)
7.PLASMA4	7.PLASMA4	Plant 7 Plasmacutter (Fugitive)
7.PLASMA5	7.PLASMA5	Plant 7 Plasmacutter (Fugitive)
7.PLASMA6	7.PLASMA6	Plant 7 Plasmacutter (Fugitive)
7.PRTWSH	7.PRTWSH	Three (3) Safety Kleen Parts Washers (Fugitive)
7.Q	7.Q	Non-Production Heating Unit

Equipment List (continued)

Emission Point Number	Associated Emission Unit Number (s)	Associated Emission Unit Description
7.R	7.R	One (1) Safety Kleen Parts Washer (Fugitive)
7.S	7.S	Non-Production Heating Unit
7.T	7.T	Non-Production Heating Unit
7.TORCH	7.TORCH	Ten (10) Torchcutting Units (Fugitive)
7.U	7.U	Non-Production Heating Unit
7.V	7.V	Non-Production Heating Unit
7.WELDING	7.WELDING	61 Gas-Metal Arc Welders (Fugitive)
7.WELDPLS	7.WELDPLS	47 Pulse Current Gas-Metal Arc Welders (Fugitive)
8.A1	8.A1	Non-Production Heating Unit
8.A2	8.A2	Non-Production Heating Unit
8.A3	8.A3	Non-Production Heating Unit
8.A4	8.A4	Non-Production Heating Unit
8.A5	8.A5	Non-Production Heating Unit
8.A6	8.A6	Non-Production Heating Unit
8.A7	8.A7	Non-Production Heating Unit
8.A8	8.A8	Non-Production Heating Unit
8.A9	8.A9	Non-Production Heating Unit
8.A10	8.A10	Non-Production Heating Unit
8.A11	8.A11	Non-Production Heating Unit
8.A12	8.A12	Non-Production Heating Unit
8.B	8.B	Production Engine Testing Unit
DSL TANK2	DSL TANK2	1,000 Gallon #2 Diesel Fuel Storage Tank
DSL TANK4	DSL TANK4	1,000 Gallon #2 Diesel Fuel Storage Tank
DSL TANK8	DSL TANK8	1,000 Gallon #2 Diesel Fuel Storage Tank
DSL TANK9	DSL TANK9	1,000 Gallon #2 Diesel Fuel Storage Tank
GAS TANK3	GAS TANK3	1,000 Gallon Gasoline Storage Tank
GAS TANK7	GAS TANK7	1,000 Gallon Gasoline Storage Tank
HB.A	HB.A	Production Engine Testing Unit
P.A1	P.A1	Non-Production Heating Unit
P.A2	P.A2	Non-Production Heating Unit
P.C1	P.C1	Non-Production Heating Unit
P.C2	P.C2	Non-Production Heating Unit
P.D1	P.D1	Non-Production Heating Unit
P.D2	P.D2	Non-Production Heating Unit
P.D3	P.D3	Non-Production Heating Unit
P.E	P.E	Non-Production Heating Unit
P.O	P.O	Two (2) Safety Kleen Parts Washers (Fugitive)

Equipment List (continued)

Emission Point Number	Associated Emission Unit Number (s)	Associated Emission Unit Description
P.PRTWSH	P.PRTWSH	Four (4) Safety Kleen Parts Washers (Fugitive)
P.TORCH	P.TORCH	Two (2) Parts Plant Torchcutting Units (Fugitive)
P.WELDING	P.WELDING	2 Gas-Metal Arc Welders (Fugitive)
Q.A	Q.A	Non-Production Heating Unit
W.A1	W.A1	Non-Production Heating Unit
W.B	W.B	Natural Gas Hotsey Washer
W.E	W.E	Waste Management Hook Burn-Off Oven
W.F1	W.F1	Waste Solvent Still
W.F2	W.F2	Waste Solvent Still
W.H	W.H	Aerosol Can Crusher
W.M	W.M	One (1) Safety Kleen Parts Washer (Fugitive)
F.SAND	F.SAND	Sand Blasting Unit (Fugitive)
F.SODA	F.SODA	Soda Blasting Unit (Fugitive)
PROPANE	PROPANE	Three (3) 6,000 gallon Propane Storage Tanks
PROPYLENE	PROPYLENE	Three (3) 1,000 gallon Propylene Storage Tanks
OILTANK	OILTANK	One (1) 5,000 gallon Used Oil Storage Tank

Insignificant Equipment List

Insignificant Emission Unit Number	Insignificant Emission Unit Description
1.METAL	Plant 1 Metal Drilling, Machining, and Grinding Operations
2.METAL	Plant 2 Metal Drilling, Machining, and Grinding Operations
3.METAL	Plant 3 Metal Drilling, Machining, and Grinding Operations
4.METAL	Plant 4 Metal Drilling, Machining, and Grinding Operations
5.METAL	Plant 5 Metal Drilling, Machining, and Grinding Operations
6.METAL	Plant 6 Metal Drilling, Machining, and Grinding Operations

II. Facility-Wide Conditions

Facility Name: Vermeer Manufacturing Co.

Permit Number: 99-TV-052

Permit conditions are established in accord with 567 Iowa Administrative Code rule 22.108

Permit Duration

The term of this permit is:5 years

Commencing on:October 19, 1999

Ending on:October 18, 2004

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

Emission Limits

The atmospheric emissions from the facility and the specified units shall not exceed the following:

Pollutant:Nitrogen Oxides (NO_x) Facility-wide limit

Emission Rate (tons/yr.):249

Authority for Requirement: Iowa DNR Construction Permit 97-A-298-S3

Pollutant:Volatile Organic Compound (VOC) Facility-wide limit

Emission Rate (tons/yr.):249

Authority for Requirement: Iowa DNR Construction Permit 96-A-1216-S3

Reporting & Recordkeeping:

All records, as required in the following, shall be satisfactory for demonstrating compliance with all applicable emission limits.

Records shall be kept on-site for five years and shall be available for inspection by the Department. Records shall be maintained in a legible and orderly manner and shall indicate the following:

- A. The amount of each paint and solvent used in all painting operations, other than architectural, in gallons. Calculate and record monthly and 12-month rolling totals for each paint and solvent.
- B. The VOC content of any paint and solvent used in all painting operations, other than architectural, in pounds per gallon.
- C. The amount of paint and solvent waste sent off-site for disposal from all painting operations, other than architectural, in gallons. Calculate and record monthly and 12-month rolling totals for each waste stream.

- D. The VOC content of any paint and solvent waste from production operations, other than architectural, sent off site for disposal, in pounds per gallon.
- E. The amount of solvent recycled for re-use in all painting operations, other than architectural, in gallons.
- F. The VOC content of any solvent recycled for reuse in all painting operations, other than architectural, in pounds per gallon.
- G. Calculate and record monthly and 12-month rolling totals of VOC emissions from all painting operations, other than architectural, at this source, in tons.
- H. Calculate and record monthly and 12-month rolling totals of VOC emissions from all emission units at this source, in tons.

Authority for Requirement: Iowa DNR Construction Permit 97-A-972-S3

- A. The amount of diesel fuel used in all production test units, in gallons. Calculate and record monthly and 12-month rolling totals.
- B. The amount of gasoline used in all production test units, in gallons. Calculate and record monthly and 12-month rolling totals.
- C. The sulfur content of any fuel used in this unit, in weight percent.
- D. The amount of VOC emitted by the production test units, in tons. Calculate and record monthly and 12-month rolling totals. Emissions must be based on total gallons used and AP-42 factors for engines less than 600 hp.
- E. The amount of NOx emitted by the production test units, in tons. Calculate and record monthly and 12-month rolling totals. Emissions must be based on total gallons used and AP-42 factors for engines less than 600 hp.
- F. Calculate and record monthly and 12-month rolling totals of NOx emissions from all production test units at this source, in tons.
- G. Calculate and record monthly and 12-month rolling totals of VOC emissions from all production test units at this source, in tons.
- H. Calculate and record monthly and 12-month rolling totals of NOx emissions from all emission units at this source, in tons.
- I. Calculate and record monthly and 12-month rolling totals of VOC emissions from all emission units at this source, in tons.

Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S3

- A. The amount of natural gas used in all units, in cubic feet. Calculate and record monthly and 12-month rolling totals.
- B. The amount of propane used in all units, in gallons. Calculate and record monthly and 12-month rolling totals.
- C. The amount VOC emitted by all natural gas and propane fired units, in tons. Calculate and record monthly and 12-month rolling totals.
- D. The amount NOx emitted by all natural gas and propane fired units, in tons. Calculate and record monthly and 12-month rolling totals.

Authority for Requirement: Iowa DNR Construction Permit 98-A-094-S1

Facility-Wide Operational Limits

The facility as a whole shall adhere to the following:

Process Throughput:

- A. The sulfur content of any diesel fuel used at this facility shall not exceed 0.4% by weight.

Reporting & Record keeping: See the previous Emission Limits section requirements.

Authority for Requirement: Iowa DNR Construction Permit 97-A-1100-S2

Process Throughput:

- A. The sulfur content of any number one or number two diesel fuel combusted at this facility shall not exceed 0.5% by weight.

Reporting & Record keeping: See the previous Emission Limits section requirements.

Authority for Requirement: 567 IAC 23.3(3)

Process Throughput:

- A. The sulfur content of natural gas or LPG combusted at this facility shall not exceed 123 ppm by weight.

Reporting & Record keeping:

All records, as required in the following, shall demonstrate compliance with all applicable limits on LPG.

All records shall be made available for inspection upon request by representatives of the Iowa DNR. The records, as a minimum, shall consist of the following:

- A. The amount of LPG purchased by this facility, in gallons. Calculate and record monthly and twelve (12) month rolling totals.
- B. The owner/operator shall obtain two reports per year from the LPG supplier, one in July and one in December, to verify the sulfur content of the LPG.

Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Unless specified otherwise in the Source Specific Conditions, the following limitations and supporting regulations apply to all emission points at this facility:

Opacity (visible emissions): 40% opacity
Authority for Requirement: 567 IAC 23.3(2)"d"

SO₂:500 parts per million
Authority for Requirement: 567 IAC 23.3(3)"e"

Particulate Matter: Shall not exceed the amount determined from Table I (process weight rate) of Chapter 23 of the rules. If the director determines that a process complying with the emission rates specified in Table I is causing or will cause air pollution in a specific area of the state, an emission standard of 0.1 grain per standard cubic foot of exhaust gas may be imposed.

Authority for Requirement: 567 IAC 23.3(2)"a"

Fugitive Dust: Attainment and Unclassified Areas - No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved public roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance, as defined in Iowa Code section 657.1, from becoming airborne. All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions that require abatement pursuant to this subrule. Reasonable precautions may include, but not limited to, the following procedures.

1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizers or limestone.
4. Covering at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.

Authority for Requirement: 567--IAC 23.3(2)"c"

III. Emission Point-Specific Conditions

Facility Name: Vermeer Manufacturing Co.
Permit Number: 99-TV-052

Emission Point ID Number: 1.AA

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.AA

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.AA
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.35 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Emission Limits (continued):

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.AC

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.AC

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.AC
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.35 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.AD

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.AD

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.AD
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.18 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.AF

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.AF

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.AF
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 1.95 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limit(s):40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant:Particulate Matter (TSP)
Emission Limit(s):15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant:Particulate Matter (TSP)
Emission Limits:0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant:Sulfur Dioxide (SO₂)
Emission Limits:500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant:Nitrogen Oxides (NO_x)
Emission Limit(s):See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.AG1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.AG
Emissions Control Equipment ID Number:1.AG
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.AG
Emission Unit Description: Finish Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-972-S3
567 IAC 23.3(2)"d"

Pollutant:PM₁₀
Emission Limit(s):1.0 lb./hr.
Authority for Requirement: Iowa DNR Construction Permit 97-A-972-S3

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 97-A-972-S3
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-972-S3

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project:

Equipment parameters:

The emission unit associated with this emission point will maintain a Graco, multi-color, precision mix system with two gun flush boxes, solvent meters, and solvent valves. The system will be supplied with a microprocessor which will control solvent, paint, and catalyst flow to a mixing tube adjacent to the emission unit and record the cumulative amount of the exact volume or weight of paint, solvent, or catalyst utilized in the emission unit. The system will be interlocked with the two Graco gun flush boxes, and the guns will be interlocked with the fans of the paint spray booth.

Authority for Requirement: Paragraph 3b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The report shall evaluate the performance of the SEP and document the extent of VOC emissions reductions. Vermeer shall conduct cumulative mass balance calculations to determine the actual effect measured against the 1997 baseline of 122.94 tons of VOC emitted per year. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999. For additional reporting and recordkeeping see the Facility-Wide Conditions.

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889
Iowa DNR Construction Permit 97-A-972-S3

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 43.5

Stack Diameter (inches): 36.0

Stack Exhaust Flow Rate (acfm): 24,000

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-972-S3

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Stack Testing:

Pollutant: Particulate Matter (TSP)

Stack Test to be Completed by (date): October 18, 2001

Test Method: Iowa Compliance Sampling Manual

Authority for Requirement: 567 IAC 22.108(3)

The higher of the results for emissions from the compliance stack testing of emission points 1.AG1 and 1.AG2 will be used to calculate actual emissions for this source until such time as more recent data becomes available. If the source test does not demonstrate compliance this permit will be reopened to add a compliance plan and operation and maintenance requirements.

The owner of this equipment or the owner’s authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.AG2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.AG
Emissions Control Equipment ID Number:1.AG
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.AG
Emission Unit Description: Finish Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-973-S3
567 IAC 23.3(2)"d"

Pollutant:PM₁₀
Emission Limit(s):1.0 lb./hr.
Authority for Requirement: Iowa DNR Construction Permit 97-A-973-S3

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 97-A-973-S3
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-973-S3

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project:

Equipment parameters:

The emission unit associated with this emission point will maintain a Graco, multi-color, precision mix system with two gun flush boxes, solvent meters, and solvent valves. The system will be supplied with a microprocessor which will control solvent, paint, and catalyst flow to a mixing tube adjacent to the emission unit and record the cumulative amount of the exact volume or weight of paint, solvent, or catalyst utilized in the emission unit. The system will be interlocked with the two Graco gun flush boxes, and the guns will be interlocked with the fans of the paint spray booth.

Authority for Requirement: Paragraph 3b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The report shall evaluate the performance of the SEP and document the extent of VOC emissions reductions. Vermeer shall conduct cumulative mass balance calculations to determine the actual effect measured against the 1997 baseline of 122.94 tons of VOC emitted per year. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999. For additional reporting and recordkeeping see the Facility-Wide Conditions.

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889
Iowa DNR Construction Permit 97-A-973-S3

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 43.5

Stack Diameter (inches): 36.0

Stack Exhaust Flow Rate (acfm): 24,000

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-973-S3

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Stack Testing:

Pollutant: Particulate Matter (TSP)

Stack Test to be Completed by (date): October 18, 2001

Test Method: Iowa Compliance Sampling Manual

Authority for Requirement: 567 IAC 22.108(3)

The higher of the results for emissions from the compliance stack testing of emission points 1.AG1 and 1.AG2 will be used to calculate actual emissions for this source until such time as more recent data becomes available. If the source test does not demonstrate compliance this permit will be reopened to add a compliance plan and operation and maintenance requirements.

The owner of this equipment or the owner’s authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.AH

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.AH1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.AH1
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 49.1 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.AJ

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.AJ

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.AJ
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 49.1 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.AP

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.AP

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.AP
Emission Unit Description: Paint Kitchen
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 3 Barrels

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-089-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 41
Stack Diameter (inches): 15
Stack Exhaust Flow Rate (acfm): 3,500
Stack Temperature (°F): 70
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 98-A-089-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.AQ

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.AQ1, 1.AQ2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.AQ1
Emission Unit Description: Paint Kitchen
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 3 Barrels

Emission Unit vented through this Emission Point: 1.AQ2
Emission Unit Description: Paint Kitchen
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 3 Barrels

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-090-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 41
Stack Diameter (inches): 20
Stack Exhaust Flow Rate (acfm): 7,000
Stack Temperature (°F): 70
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 98-A-090-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.AR

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.AR

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.AR
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 60.6 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.AS

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.AS

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.AS
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 60.6 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.AT

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.AT

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.AT
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 60.6 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.AU

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.AU

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.AU
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 50.5 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity: 25%⁽¹⁾

(1) If visible emissions are observed that exceed the indicator opacity other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-1107-S3
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 97-A-1107-S3
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu

Authority for Requirement: Iowa DNR Construction Permit 97-A-1107-S3
567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1107-S3

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1107-S3

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-1107-S3

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 38

Stack Diameter (inches): 12

Stack Exhaust Flow Rate (acfm): 5,750

Stack Temperature (°F): 759

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-1107-S3

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.C

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.C

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.C
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 2.5 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.D

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.D

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.D
Emission Unit Description: Hot Water Heater
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.28 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.FLAME1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.FLAME1
Emissions Control Equipment ID Number:1.FLAME1
Emissions Control Equipment Description:Water Table

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.FLAME1 (Fugitive)
Emission Unit Description: Single Cutting Head Oxyacetylene
Torch Unit
Raw Material/Fuel: Sheet Steel
Rated Capacity: 660 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.FLAME2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.FLAME2
Emissions Control Equipment ID Number:1.FLAME2
Emissions Control Equipment Description:Water Table

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.FLAME2 (Fugitive)
Emission Unit Description: Single Cutting Head Oxyacetylene
Torch Unit
Raw Material/Fuel: Sheet Steel
Rated Capacity: 660 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.J

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.J

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.J
Emission Unit Description: Paint Oven
Raw Material/Fuel: Natural Gas
Rated Capacity: 2.0 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-094-S1
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 98-A-094-S1
567 IAC 23.4(13)

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-094-S1

Emission Limits (continued):

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-094-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

A. This oven shall be fired by natural gas or propane only.

Reporting & Recordkeeping: See Facility-Wide Emission Limits

Authority for Requirement: Iowa DNR Construction Permit 98-A-094-S1

Process throughput:

A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 35

Stack Diameter (inches): 12

Stack Exhaust Flow Rate (acfm): 1153

Stack Temperature (°F): 106

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-094-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

Opacity shall be observed once a week during a period when the emission unit associated with this emission point is at or near full capacity and record if visible emissions were present.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.K

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.K
Emissions Control Equipment ID Number:1.K
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.K
Emission Unit Description: Parts Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-974-S3
567 IAC 23.3(2)"d"

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 97-A-974-S3
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-974-S3

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project:

Equipment parameters:

The emission unit associated with this emission point will maintain a Graco, multi-color, precision mix system with two gun flush boxes, solvent meters, and solvent valves. The system will be supplied with a microprocessor which will control solvent, paint, and catalyst flow to a mixing tube adjacent to the emission unit and record the cumulative amount of the exact volume or weight of paint, solvent, or catalyst utilized in the emission unit. The system will be interlocked with the two Graco gun flush boxes, and the guns will be interlocked with the fans of the paint spray booth.

Authority for Requirement: Paragraph 3b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The report shall evaluate the performance of the SEP and document the extent of VOC emissions reductions. Vermeer shall conduct cumulative mass balance calculations to determine the actual effect measured against the 1997 baseline of 122.94 tons of VOC emitted per year. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999. For additional reporting and recordkeeping see the Facility-Wide Conditions.

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889
Iowa DNR Construction Permit 97-A-974-S3

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 42.1

Stack Diameter (inches): 34.0

Stack Exhaust Flow Rate (acfm): 21,195

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-974-S3

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Stack Testing:

Pollutant: Particulate Matter (TSP)

Stack Test to be Completed by (date): October 18, 2001

Test Method: Iowa Compliance Sampling Manual

Authority for Requirement: 567 IAC 22.108(3)

This stack test will represent the compliance testing for emission points 1.K, 2.H, 3.G, and 5.J. In the event that a stack test of one of the other listed emission points is more suitable it may be tested to fulfill the requirements. Suitability will be determined by the Stack Test Observation Coordinator of the Air Quality Bureau Compliance Assistance Section. The results of the compliance stack testing will be used to calculate actual emissions for the listed sources until such time as more recent data becomes available. If the source test does not demonstrate compliance this permit will be reopened to add a compliance plan and operation and maintenance requirements.

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Periodic Monitoring Requirements (continued):

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.O

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.O

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.O
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 2.0 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.PLASMA1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.PLASMA1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.PLASMA1 (Fugitive)
Emission Unit Description: Single Head Plasma Cutting
Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 4,500 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.PRTWSH

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.PRTWSH

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.PRTWSH (Fugitive)
Emission Unit Description: Five (5) Safety Kleen Parts Washers
Raw Material/Fuel: Stoddard Solvent
Rated Capacity: 55 Gallons Solvent per Washer

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.T

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.T
Emissions Control Equipment ID Number:1.T-1
Emissions Control Equipment Description:Baghouse

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.T
Emission Unit Description: Wheelabrator Shot Blast Booth
Raw Material/Fuel: Steel Parts
Rated Capacity: 40 lb./hr of Abrasive Shot

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limit(s):40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.05 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 79-A-108
567 IAC 23.4(13)

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.TORCH

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.TORCH

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.TORCH (Fugitive)
Emission Unit Description: Nine (9) Single Cutting Head
Oxyacetylene Torch Units
Raw Material/Fuel: Sheet Steel
Rated Capacity: 840 inches of metal cut/hr. per Head

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.U

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.U

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.U
Emission Unit Description: Hot Water Heater
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.528 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limit(s):40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant:Particulate Matter (TSP)
Emission Limit(s):15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant:Particulate Matter (TSP)
Emission Limits:0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant:Sulfur Dioxide (SO₂)
Emission Limits:500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant:Nitrogen Oxides (NO_x)
Emission Limit(s):See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.V

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.V

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.V
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 2.0 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.WELDING

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.WELDING

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.WELDING (Fugitive)
Emission Unit Description: 37 GMAW Units
Raw Material/Fuel: E70S Weld Wire
Rated Capacity: 19 lb. of Wire/hr. per Unit

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.WELDPLS

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.WELDPLS

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.WELDPLS (Fugitive)
Emission Unit Description: 19 Pulse Current GMAW Units
Raw Material/Fuel: E70S Weld Wire
Rated Capacity: 19 lb. of Wire/hr. per Unit

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.
This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.Y

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 1.Y

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 1.Y
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 8.0 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limit(s):40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant:Particulate Matter (TSP)
Emission Limit(s):15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant:Particulate Matter (TSP)
Emission Limits:0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant:Sulfur Dioxide (SO₂)
Emission Limits:500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant:Nitrogen Oxides (NO_x)
Emission Limit(s):See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.AB

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.AB

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.AB
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 51.7 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.AF

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.AF1, 2.AF2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Units vented through this Emission Point: 2.AF1

Emission Unit Description: Paint Kitchen

Raw Material/Fuel: Paints, Primers, and Solvents

Rated Capacity: 3 Barrels

Emission Units vented through this Emission Point: 2.AF2

Emission Unit Description: Paint Kitchen

Raw Material/Fuel: Paints, Primers, and Solvents

Rated Capacity: 3 Barrels

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 98-A-073-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 41

Stack Diameter (inches): 20

Stack Exhaust Flow Rate (acfm): 7,000

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-073-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.AG

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.AG

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.AG
Emission Unit Description: Paint Kitchen
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 3 Barrels

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-074-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 41
Stack Diameter (inches): 15
Stack Exhaust Flow Rate (acfm): 3,500
Stack Temperature (°F): 70
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 98-A-074-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2AI1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.AI
Emissions Control Equipment ID Number:2.AI
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.AI
Emission Unit Description: Finish Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-859-S2
567 IAC 23.3(2)"d"

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 98-A-859-S2
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-859-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 36.2

Stack Diameter (inches): 42.0

Stack Exhaust Flow Rate (acfm): 16,875

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-859-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Stack Testing:

Pollutant: Particulate Matter (TSP)

Stack Test to be Completed by (date): October 18, 2001

Test Method: Iowa Compliance Sampling Manual

Authority for Requirement: 567 IAC 22.108(3)

The higher of the results for emissions from the compliance stack testing of emission points 2.AI1 and 2.AI 2 will be used to calculate actual emissions for this source until such time as more recent data becomes available. If the source test does not demonstrate compliance this permit will be reopened to add a compliance plan and operation and maintenance requirements.

The owner of this equipment or the owner’s authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.AI2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.AI
Emissions Control Equipment ID Number:2.AI
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.AI
Emission Unit Description: Finish Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-860-S2
567 IAC 23.3(2)"d"

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 98-A-860-S2
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-860-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 36.2

Stack Diameter (inches): 42.0

Stack Exhaust Flow Rate (acfm): 16,875

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-860-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Stack Testing:

Pollutant: Particulate Matter (TSP)

Stack Test to be Completed by (date): October 18, 2001

Test Method: Iowa Compliance Sampling Manual

Authority for Requirement: 567 IAC 22.108(3)

The higher of the results for emissions from the compliance stack testing of emission points 2.AI1 and 2.AI 2 will be used to calculate actual emissions for this source until such time as more recent data becomes available. If the source test does not demonstrate compliance this permit will be reopened to add a compliance plan and operation and maintenance requirements.

The owner of this equipment or the owner’s authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.AJ

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.AJ

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.AJ
Emission Unit Description: Paint Booth Air Intake
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 3.28 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.B

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.B

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.B
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.35 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.E

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.E

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.E
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 49.1 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.F1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.F
Emissions Control Equipment ID Number:2.F
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.F
Emission Unit Description: Finish Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-075-S2
567 IAC 23.3(2)"d"

Pollutant:PM₁₀
Emission Limit(s):0.9 lb./hr.
Authority for Requirement: Iowa DNR Construction Permit 98-A-075-S2

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 98-A-075-S2
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-075-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 46.2

Stack Diameter (inches): 42.0

Stack Exhaust Flow Rate (acfm): 21,000

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-075-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.F2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.F
Emissions Control Equipment ID Number:2.F
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.F
Emission Unit Description: Finish Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-076-S2
567 IAC 23.3(2)"d"

Pollutant:PM₁₀
Emission Limit(s):0.9 lb./hr.
Authority for Requirement: Iowa DNR Construction Permit 98-A-076-S2

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 98-A-076-S2
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-076-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 46.2

Stack Diameter (inches): 42.0

Stack Exhaust Flow Rate (acfm): 21,000

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-076-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.FLAME1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.FLAME1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.FLAME1 (Fugitive)
Emission Unit Description: Single Cutting Head Oxyacetylene
Torch Unit
Raw Material/Fuel: Sheet Steel
Rated Capacity: 660 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.FLAME2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.FLAME2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.FLAME2 (Fugitive)
Emission Unit Description: Single Cutting Head Oxyacetylene
Torch Unit
Raw Material/Fuel: Sheet Steel
Rated Capacity: 660 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.G

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.G

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.G
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 49.1 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.H

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.H
Emissions Control Equipment ID Number:2.H
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.H
Emission Unit Description: Parts Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-077-S2
567 IAC 23.3(2)"d"

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 98-A-077-S2
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-077-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 42.5

Stack Diameter (inches): 42.0

Stack Exhaust Flow Rate (acfm): 21,195

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-077-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source’s compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility’s implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.I

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.I

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.I
Emission Unit Description: Paint Oven
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.108 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-078-S1
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 98-A-078-S1
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-078-S1

Emission Limits (continued):

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-078-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

A. This oven shall be fired by natural gas or propane only.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 98-A-078-S1

Process throughput:

A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 34

Stack Diameter (inches): 12

Stack Exhaust Flow Rate (acfm): 1275

Stack Temperature (°F): 150

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-078-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.J

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.J

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.J
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 49.1 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.P

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.P

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.P
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 6.33 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.PLASMA1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.PLASMA1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.PLASMA1 (Fugitive)
Emission Unit Description: Single Head Plasma Cutting
Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 4,500 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.PLASMA2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.PLASMA2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.PLASMA2 (Fugitive)
Emission Unit Description: Single Head Plasma Cutting
Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 4,500 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.PLASMA3

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.PLASMA3
Emissions Control Equipment ID Number:2.PLASMA3
Emissions Control Equipment Description:Baghouse

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.PLASMA3 (Fugitive)
Emission Unit Description: Single Head Whitney Plasma Cutting Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 12,000 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.PLASMA4

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.PLASMA4
Emissions Control Equipment ID Number:2.PLASMA4
Emissions Control Equipment Description:Baghouse

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.PLASMA4 (Fugitive)
Emission Unit Description: Single Head Whitney Plasma Cutting Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 12,000 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.PLASMA5

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.PLASMA5
Emissions Control Equipment ID Number:2.PLASMA5
Emissions Control Equipment Description:Baghouse

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.PLASMA5 (Fugitive)
Emission Unit Description: Single Head Whitney Plasma Cutting Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 12,000 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.PRTWSH

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.PRTWSH

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.PRTWSH (Fugitive)
Emission Unit Description: Four (4) Safety Kleen Parts Washers
Raw Material/Fuel: Stoddard Solvent
Rated Capacity: 55 Gallons Solvent per Washer

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.Q

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.Q

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.Q
Emission Unit Description: Hot Water Heater
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.528 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.T

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.T

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.T
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 8.0 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.TORCH

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.TORCH

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.TORCH (Fugitive)
Emission Unit Description: Nine (9) Single Cutting Head
Oxyacetylene Torch Units
Raw Material/Fuel: Sheet Steel
Rated Capacity: 840 inches of metal cut/hr. per Head

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.V1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.V1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.V1
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.18 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.V2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.V2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.V2
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.18 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.WELDING

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.WELDING

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.WELDING (Fugitive)
Emission Unit Description: 45 GMAW Units
Raw Material/Fuel: E70S Weld Wire
Rated Capacity: 19 lb. of Wire/hr. per Unit

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.
This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.WELDPLS

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.WELDPLS

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.WELDPLS (Fugitive)
Emission Unit Description: 8 Pulse Current GMAW Units
Raw Material/Fuel: E70S Weld Wire
Rated Capacity: 19 lb. of Wire/hr. per Unit

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.X

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.X

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.X
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.10 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 2.Y1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 2.Y1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 2.Y1
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.15 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.A1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.A1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.A1
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 54.5 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity: 25%⁽¹⁾

(1) If visible emissions are observed that exceed the indicator opacity other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-1100-S2
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 97-A-1100-S2
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu

Authority for Requirement: Iowa DNR Construction Permit 97-A-1100-S2
567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1100-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1100-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-1100-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 27

Stack Diameter (inches): 12

Stack Exhaust Flow Rate (acfm): 6210

Stack Temperature (°F): 759

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-1100-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.A2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.A2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.A2
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 54.5 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity: 25%⁽¹⁾

(1) If visible emissions are observed that exceed the indicator opacity other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-1101-S2
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 97-A-1101-S2
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu

Authority for Requirement: Iowa DNR Construction Permit 97-A-1101-S2
567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1101-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1101-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-1101-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 30

Stack Diameter (inches): 12

Stack Exhaust Flow Rate (acfm): 6210

Stack Temperature (°F): 759

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-1101-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.AA

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.AA

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.AA
Emission Unit Description: Parts Heating Oven
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.35 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40%
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-094

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-094

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.B

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.B

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.B
Emission Unit Description: Finish Paint Oven
Raw Material/Fuel: Natural Gas
Rated Capacity: 2.0 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Emission Limits (continued):

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

A. This oven shall be fired by natural gas or propane only.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Process throughput:

A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 35.5

Stack Diameter (inches): 12.0

Stack Exhaust Flow Rate (acfm): 900

Stack Temperature (°F): 90

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.BB

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.BB

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.BB
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 1.30 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.C

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.C

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.C
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 2.0 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.D1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.D1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.D1
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 54.5 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity: 25%⁽¹⁾

(1) If visible emissions are observed that exceed the indicator opacity other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-1102-S2
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 97-A-1102-S2
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu

Authority for Requirement: Iowa DNR Construction Permit 97-A-1102-S2
567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1102-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1102-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-1102-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 37.4

Stack Diameter (inches): 12

Stack Exhaust Flow Rate (acfm): 6210

Stack Temperature (°F): 759

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-1102-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.D2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.D2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.D2
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 54.5 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity: 25%⁽¹⁾

(1) If visible emissions are observed that exceed the indicator opacity other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-1103-S2
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 97-A-1103-S2
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu

Authority for Requirement: Iowa DNR Construction Permit 97-A-1103-S2
567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1103-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1103-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-1103-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 38.1

Stack Diameter (inches): 12

Stack Exhaust Flow Rate (acfm): 6210

Stack Temperature (°F): 759

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-1103-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.D3

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.D3

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.D3
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 54.5 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity: 25%⁽¹⁾

(1) If visible emissions are observed that exceed the indicator opacity other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-1104-S2
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 97-A-1104-S2
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu

Authority for Requirement: Iowa DNR Construction Permit 97-A-1104-S2
567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1104-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1104-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-1104-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 35

Stack Diameter (inches): 12

Stack Exhaust Flow Rate (acfm): 6210

Stack Temperature (°F): 759

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-1104-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.EE

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.EE

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.EE
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.14 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.F1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.F
Emissions Control Equipment ID Number:3.F
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.F
Emission Unit Description: Finish Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-004-S2
567 IAC 23.3(2)"d"

Pollutant:PM₁₀
Emission Limit(s):0.9 lb./hr.
Authority for Requirement: Iowa DNR Construction Permit 98-A-004-S2

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 98-A-004-S2
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-004-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 39

Stack Diameter (inches): 42.0

Stack Exhaust Flow Rate (acfm): 21,000

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-004-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.F2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.F
Emissions Control Equipment ID Number:3.F
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.F
Emission Unit Description: Finish Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-005-S2
567 IAC 23.3(2)"d"

Pollutant:PM₁₀
Emission Limit(s):0.9 lb./hr.
Authority for Requirement: Iowa DNR Construction Permit 98-A-005-S2

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 98-A-005-S2
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-005-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 39

Stack Diameter (inches): 42.0

Stack Exhaust Flow Rate (acfm): 21,000

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-005-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.FLAME1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.FLAME1
Emissions Control Equipment ID Number:3.FLAME1
Emissions Control Equipment Description:Water Table

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.FLAME1 (Fugitive)
Emission Unit Description: Single Cutting Head Oxyacetylene
Torch Unit
Raw Material/Fuel: Sheet Steel
Rated Capacity: 660 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.FLAME2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.FLAME2
Emissions Control Equipment ID Number:3.FLAME2
Emissions Control Equipment Description:Water Table

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.FLAME2 (Fugitive)
Emission Unit Description: Eight (8) Cutting Head
Oxyacetylene Torch Unit
Raw Material/Fuel: Sheet Steel
Rated Capacity: 660 inches of metal cut/hr. per Head

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.FLAME3

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.FLAME3
Emissions Control Equipment ID Number:3.FLAME3
Emissions Control Equipment Description:Water Table

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.FLAME3 (Fugitive)
Emission Unit Description: Eight (8) Cutting Head
Oxyacetylene Torch Unit
Raw Material/Fuel: Sheet Steel
Rated Capacity: 660 inches of metal cut/hr. per Head

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.FLAME4

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.FLAME4

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.FLAME4 (Fugitive)
Emission Unit Description: Single Cutting Head Oxyacetylene
Torch Unit
Raw Material/Fuel: Sheet Steel
Rated Capacity: 660 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.FLAME5

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.FLAME5

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.FLAME5 (Fugitive)
Emission Unit Description: Single Cutting Head Oxyacetylene
Torch Unit
Raw Material/Fuel: Sheet Steel
Rated Capacity: 660 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.G

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.G
Emissions Control Equipment ID Number:3.G
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.G
Emission Unit Description: Parts Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-006-S2
567 IAC 23.3(2)"d"

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 98-A-006-S2
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-006-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 43.1

Stack Diameter (inches): 42.0

Stack Exhaust Flow Rate (acfm): 19,320

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-006-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.GG

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.GG

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.GG
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.05 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.GH

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.GH

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Units vented through this Emission Point: 3.GH
Emission Unit Description: Paint Kitchen
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 3 Barrels

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-007-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 41
Stack Diameter (inches): 15
Stack Exhaust Flow Rate (acfm): 3,500
Stack Temperature (°F): 70
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 98-A-007-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.GI

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.GI

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.GI
Emission Unit Description: Paint Kitchen
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 3 Barrels

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-008-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 41
Stack Diameter (inches): 15
Stack Exhaust Flow Rate (acfm): 3,500
Stack Temperature (°F): 70
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 98-A-008-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.H

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.H

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.H
Emission Unit Description: Hot Water Heater
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.528 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.HH

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.HH
Emissions Control Equipment ID Number:3.HH
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.HH
Emission Unit Description: Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 5.625 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 99-A-688-S1
567 IAC 23.3(2)"d"

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 99-A-688-S1
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 99-A-688-S1

Compliance Testing Requirements

TSP.....Iowa Compliance Sampling Manual

The owner shall verify compliance with the emission limitations contained in Construction Permit 99-A-688-S1 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the startup date of the proposed equipment. The test shall be conducted with the equipment operating in a manner representative of full rated capacity. Failure to test at this maximum may be cause to limit the source to operating at the level at which the compliance tests were conducted.

The owner shall furnish the DNR the following written notifications:

1. The date of intended startup at least ten (10) days before the equipment or control equipment involved is placed into operation.
2. The actual date of startup postmarked within fifteen (15) days following the start of operation.

Authority for Requirement: Iowa DNR Construction Permit 99-A-688-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Reporting & Recordkeeping: See Facility-Wide Emission Limits

Authority for Requirement: Iowa DNR Construction Permit 99-A-688-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 37.5

Stack Diameter (inches): 48.0

Stack Exhaust Flow Rate (acfm): 24,000

Stack Temperature (°F): ambient

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 99-A-688-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.I

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.I

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.I
Emission Unit Description: Paint Oven
Raw Material/Fuel: Natural Gas
Rated Capacity: 2.0 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-009-S1
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 98-A-009-S1
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-009-S1

Emission Limits (continued):

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-009-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

A. This oven shall be fired by natural gas or propane only.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 98-A-009-S1

Process throughput:

A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 31.5

Stack Diameter (inches): 12.0

Stack Exhaust Flow Rate (acfm): 2,050

Stack Temperature (°F): 143

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-009-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.II

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.II
Emissions Control Equipment ID Number:3.II
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.II
Emission Unit Description: Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 5.625 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 99-A-689-S1
567 IAC 23.3(2)"d"

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 99-A-689-S1
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 99-A-689-S1

Compliance Testing Requirements

TSP.....Iowa Compliance Sampling Manual

The owner shall verify compliance with the emission limitations contained in Construction Permit 99-A-689-S1 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the startup date of the proposed equipment. The test shall be conducted with the equipment operating in a manner representative of full rated capacity. Failure to test at this maximum may be cause to limit the source to operating at the level at which the compliance tests were conducted.

The owner shall furnish the DNR the following written notifications:

1. The date of intended startup at least ten (10) days before the equipment or control equipment involved is placed into operation.
2. The actual date of startup postmarked within fifteen (15) days following the start of operation.

Authority for Requirement: Iowa DNR Construction Permit 99-A-689-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 37.5

Stack Diameter (inches): 48.0

Stack Exhaust Flow Rate (acfm): 24,000

Stack Temperature (°F): ambient

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 99-A-689-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.JJ

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.JJ

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.JJ
Emission Unit Description: Finish Paint Oven
Raw Material/Fuel: Natural Gas
Rated Capacity: 1.728 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 99-A-686
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 99-A-686
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 99-A-686

Emission Limits (continued):

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 99-A-686

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

A. This oven shall be fired by natural gas or propane only.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 99-A-686

Process throughput:

A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 35.5

Stack Diameter (inches): 10.0

Stack Exhaust Flow Rate (acfm): 446

Stack Temperature (°F): 180

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 99-A-686

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.KK

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.KK

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.KK
Emission Unit Description: Paint Kitchen
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 6 Barrels

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 99-A-684

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 42
Stack Diameter (inches): 24
Stack Exhaust Flow Rate (acfm): 7,000
Stack Temperature (°F): ambient
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 99-A-684

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.M

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.M

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.M
Emission Unit Description: Hot Water Heater
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.528 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.N2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.N2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.N2
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 4.86 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.P

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.P

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.P
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 6.25 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.PLASMA1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.PLASMA1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.PLASMA1 (Fugitive)
Emission Unit Description: Single Head Plasma Cutting
Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 4,500 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.PLASMA2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.PLASMA2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.PLASMA2 (Fugitive)
Emission Unit Description: Single Head Plasma Cutting
Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 4,500 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.PLASMA3

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.PLASMA3

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.PLASMA3 (Fugitive)
Emission Unit Description: Single Head Plasma Cutting
Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 4,500 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.PLASMA4

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.PLASMA4
Emissions Control Equipment ID Number:3.PLASMA4
Emissions Control Equipment Description:Baghouse

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.PLASMA4 (Fugitive)
Emission Unit Description: Single Head Whitney Plasma Cutting Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 12,000 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.PLASMA5

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.PLASMA5
Emissions Control Equipment ID Number:3.PLASMA5
Emissions Control Equipment Description:Baghouse

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.PLASMA5 (Fugitive)
Emission Unit Description: Single Head Whitney Plasma Cutting Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 12,000 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.PLASMA6

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.PLASMA6
Emissions Control Equipment ID Number:3.PLASMA6
Emissions Control Equipment Description:Water Table

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.PLASMA6 (Fugitive)
Emission Unit Description: Single Head Whitney Plasma Cutting Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 12,000 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.PRTWSH

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.PRTWSH

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.PRTWSH (Fugitive)
Emission Unit Description: Three (3) Safety Kleen Parts Washers
Raw Material/Fuel: Stoddard Solvent
Rated Capacity: 55 Gallons Solvent per Washer

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.S

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.S

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.S
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 54.5 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity: 25%⁽¹⁾

(1) If visible emissions are observed that exceed the indicator opacity other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-1105-S2
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 97-A-1105-S2
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu

Authority for Requirement: Iowa DNR Construction Permit 97-A-1105-S2
567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1105-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1105-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-1105-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 37

Stack Diameter (inches): 12

Stack Exhaust Flow Rate (acfm): 6210

Stack Temperature (°F): 759

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-1105-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.T

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.T

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.T
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.18 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.TORCH

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.TORCH

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.TORCH (Fugitive)
Emission Unit Description: Seventeen (17) Single Cutting Head
Oxyacetylene Torch Units
Raw Material/Fuel: Sheet Steel
Rated Capacity: 840 inches of metal cut/hr. per Head

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.W

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.W

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.W
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 1.5 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.WELDING

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.WELDING

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.WELDING (Fugitive)
Emission Unit Description: 64 GMAW Units
Raw Material/Fuel: E70S Weld Wire
Rated Capacity: 19 lb. of Wire/hr. per Unit

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.WELDPLS

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.WELDPLS

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.WELDPLS (Fugitive)
Emission Unit Description: 16 Pulse Current GMAW Units
Raw Material/Fuel: E70S Weld Wire
Rated Capacity: 19 lb. of Wire/hr. per Unit

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.
This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.X1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.X1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.X1
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.13 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.X2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.X2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.X2
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.13 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.Y1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.Y1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.Y1
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 4.86 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 3.Z

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 3.Z

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 3.Z
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 54.5 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity: 25%⁽¹⁾

(1) If visible emissions are observed that exceed the indicator opacity other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-1106-S2
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 97-A-1106-S2
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu

Authority for Requirement: Iowa DNR Construction Permit 97-A-1106-S2
567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1106-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1106-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-1106-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 30.8

Stack Diameter (inches): 12

Stack Exhaust Flow Rate (acfm): 6210

Stack Temperature (°F): 759

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-1106-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.A1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.A1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.A1
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 2.0 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.A2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.A2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.A2
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 2.0 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.A3

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.A3

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.A3
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 2.0 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.AA

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.AA

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.AA
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 2.0 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.BB

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.BB

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.BB
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 2.0 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.CD

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.CD

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Units vented through this Emission Point: 4.CD
Emission Unit Description: Paint Kitchen
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 3 Barrels

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-029-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 43
Stack Diameter (inches): 15
Stack Exhaust Flow Rate (acfm): 3,500
Stack Temperature (°F): 70
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 98-A-029-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.CE

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.CE1, 4.CE2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.CE1
Emission Unit Description: Paint Kitchen
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 3 Barrels

Emission Unit vented through this Emission Point: 4.CE2
Emission Unit Description: Paint Kitchen
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 3 Barrels

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-030-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 43
Stack Diameter (inches): 20
Stack Exhaust Flow Rate (acfm): 7,000
Stack Temperature (°F): 70
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 98-A-030-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.D

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.D

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.D
Emission Unit Description: Hot Water Heater
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.528 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.E

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.E

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.E
Emission Unit Description: Paint Oven
Raw Material/Fuel: Natural Gas
Rated Capacity: 1.08 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-031-S1
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 98-A-031-S1
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-031-S1

Emission Limits (continued):

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-031-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

A. This oven shall be fired by natural gas or propane only.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 98-A-031-S1

Process throughput:

A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 31

Stack Diameter (inches): 12.0

Stack Exhaust Flow Rate (acfm): 1,335

Stack Temperature (°F): 125

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-031-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.F

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.F
Emissions Control Equipment ID Number:4.F
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.F
Emission Unit Description: Parts Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-032-S2
567 IAC 23.3(2)"d"

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 98-A-032-S2
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-032-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 39.5

Stack Diameter (inches): 42.0

Stack Exhaust Flow Rate (acfm): 28,000

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-032-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Stack Testing:

Pollutant: Particulate Matter (TSP)

Stack Test to be Completed by (date): October 18, 2001

Test Method: Iowa Compliance Sampling Manual

Authority for Requirement: 567 IAC 22.108(3)

The results of the compliance stack testing will be used to calculate actual emissions for this source until such time as more recent data becomes available. If the source test does not demonstrate compliance this permit will be reopened to add a compliance plan and operation and maintenance requirements.

The owner of this equipment or the owner’s authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.FLAME1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.FLAME1
Emissions Control Equipment ID Number:4.FLAME1
Emissions Control Equipment Description:Water Table

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.FLAME1 (Fugitive)
Emission Unit Description: Two (2) Cutting Head Oxyacetylene
Torch Unit
Raw Material/Fuel: Sheet Steel
Rated Capacity: 660 inches of metal cut/hr. per Head

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.
This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.FLAME2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.FLAME2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.FLAME2 (Fugitive)
Emission Unit Description: Single Cutting Head Oxyacetylene
Torch Unit
Raw Material/Fuel: Sheet Steel
Rated Capacity: 660 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.FLAME3

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.FLAME3

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.FLAME3 (Fugitive)
Emission Unit Description: Single Cutting Head Oxyacetylene
Torch Unit
Raw Material/Fuel: Sheet Steel
Rated Capacity: 660 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.G1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.G
Emissions Control Equipment ID Number:4.G
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.G
Emission Unit Description: Finish Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-033-S2
567 IAC 23.3(2)"d"

Pollutant:PM₁₀
Emission Limit(s):0.9 lb./hr.
Authority for Requirement: Iowa DNR Construction Permit 98-A-033-S2

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 98-A-033-S2
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-033-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

- Stack Height (feet): 39.5
- Stack Diameter (inches): 42.0
- Stack Exhaust Flow Rate (acfm): 21,000
- Stack Temperature (°F): 70
- Vertical, Unobstructed Discharge Required: Yes No
- Authority for Requirement: Iowa DNR Construction Permit 98-A-033-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Stack Testing:

- Pollutant: Particulate Matter (TSP)
- Stack Test to be Completed by (date): October 18, 2001
- Test Method: Iowa Compliance Sampling Manual
- Authority for Requirement: 567 IAC 22.108(3)

This stack test will represent the compliance testing for emission points 2.F1, 2.F2, 3.F1, 3.F2, 4.G1, and 4.G2. In the event that a stack test of one of the other listed emission points is more suitable it may be tested to fulfill the requirements. Suitability will be determined by the Stack Test Observation Coordinator of the Air Quality Bureau Compliance Assistance Section. The higher of the results for emissions from the compliance stack testing of emission points 4.G1 and 4.G2 will be used to calculate actual emissions for the listed sources until such time as more recent data becomes available. If the source test does not demonstrate compliance this permit will be reopened to add a compliance plan and operation and maintenance requirements.

The owner of this equipment or the owner’s authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Periodic Monitoring Requirements (continued):

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.G2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.G
Emissions Control Equipment ID Number:4.G
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.G
Emission Unit Description: Finish Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-034-S2
567 IAC 23.3(2)"d"

Pollutant:PM₁₀
Emission Limit(s):0.9 lb./hr.
Authority for Requirement: Iowa DNR Construction Permit 98-A-034-S2

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 98-A-034-S2
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-034-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 39.5

Stack Diameter (inches): 42.0

Stack Exhaust Flow Rate (acfm): 21,000

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-034-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Stack Testing:

Pollutant: Particulate Matter (TSP)

Stack Test to be Completed by (date): October 18, 2001

Test Method: Iowa Compliance Sampling Manual

Authority for Requirement: 567 IAC 22.108(3)

This stack test will represent the compliance testing for emission points 2.F1, 2.F2, 3.F1, 3.F2, 4.G1, and 4.G2. In the event that a stack test of one of the other listed emission points is more suitable it may be tested to fulfill the requirements. Suitability will be determined by the Stack Test Observation Coordinator of the Air Quality Bureau Compliance Assistance Section. The higher of the results for emissions from the compliance stack testing of emission points 4.G1 and 4.G2 will be used to calculate actual emissions for the listed sources until such time as more recent data becomes available. If the source test does not demonstrate compliance this permit will be reopened to add a compliance plan and operation and maintenance requirements.

The owner of this equipment or the owner’s authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Periodic Monitoring Requirements (continued):

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.H2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.H2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.H2
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 5.35 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.I

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.I

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.I
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 60.6 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity: 25%⁽¹⁾

(1) If visible emissions are observed that exceed the indicator opacity other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-1108-S2
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 97-A-1108-S2
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu

Authority for Requirement: Iowa DNR Construction Permit 97-A-1108-S2
567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1108-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1108-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-1108-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 36

Stack Diameter (inches): 12

Stack Exhaust Flow Rate (acfm): 7,386.8

Stack Temperature (°F): 845

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-1108-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.J

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.J

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.J
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 37.3 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.K2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.K2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.K2
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 5.35 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.L

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.L

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.L
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.24 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.LASER

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.LASER
Emissions Control Equipment ID Number:4.LASER
Emissions Control Equipment Description:Baghouse

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.LASER (Fugitive)
Emission Unit Description: Single Head Laser Cutting Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 8,268 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.PLASMA1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.PLASMA1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.PLASMA1 (Fugitive)
Emission Unit Description: Single Head Plasma Cutting
Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 4,500 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.PLASMA2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.PLASMA2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.PLASMA2 (Fugitive)
Emission Unit Description: Single Head Plasma Cutting
Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 4,500 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.PLASMA3

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.PLASMA3

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.PLASMA3 (Fugitive)
Emission Unit Description: Single Head Plasma Cutting
Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 4,500 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.PLASMA4

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.PLASMA4
Emissions Control Equipment ID Number:4.PLASMA4
Emissions Control Equipment Description:Baghouse

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.PLASMA4 (Fugitive)
Emission Unit Description: Single Head Whitney Plasma Cutting Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 12,000 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.PLASMA5

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.PLASMA5
Emissions Control Equipment ID Number:4.PLASMA5
Emissions Control Equipment Description:Baghouse

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.PLASMA5 (Fugitive)
Emission Unit Description: Single Head Whitney Plasma Cutting Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 12,000 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.PRTWSH

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.PRTWSH

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.PRTWSH (Fugitive)
Emission Unit Description: Seven (7) Safety Kleen Parts Washers
Raw Material/Fuel: Stoddard Solvent
Rated Capacity: 55 Gallons Solvent per Washer

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.R

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.R

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.R
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 3.24 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.S

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.S

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.S
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 60.6 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity: 25%⁽¹⁾

(1) If visible emissions are observed that exceed the indicator opacity other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-1109-S2
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 97-A-1109-S2
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu

Authority for Requirement: Iowa DNR Construction Permit 97-A-1109-S2
567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1109-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1109-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-1109-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 36

Stack Diameter (inches): 12

Stack Exhaust Flow Rate (acfm): 7,386.8

Stack Temperature (°F): 845

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-1109-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. The facility shall use EPA Method 22 for the monitoring method. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.T

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.T

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.T
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.09 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.TORCH

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.TORCH

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.TORCH (Fugitive)
Emission Unit Description: Thirteen (13) Single Cutting Head
Oxyacetylene Torch Units
Raw Material/Fuel: Sheet Steel
Rated Capacity: 840 inches of metal cut/hr. per Head

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.WELDING

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.WELDING

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.WELDING (Fugitive)
Emission Unit Description: 66 GMAW Units
Raw Material/Fuel: E70S Weld Wire
Rated Capacity: 19 lb. of Wire/hr. per Unit

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.
This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.WELDPLS

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.WELDPLS

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.WELDPLS (Fugitive)
Emission Unit Description: 30 Pulse Current GMAW Units
Raw Material/Fuel: E70S Weld Wire
Rated Capacity: 19 lb. of Wire/hr. per Unit

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.
This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.Z

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 4.Z

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 4.Z
Emission Unit Description: Hot Water Heater
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.50 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.A

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.A

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.A
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 3.58 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.AA

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.A

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.AA
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.25 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.B1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.B1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.B1
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 2.0 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.B2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.B2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.B2
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 2.0 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.BB

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.BB1, 5.BB2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.BB1
Emission Unit Description: Paint Kitchen
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 3 Barrels

Emission Unit vented through this Emission Point: 5.BB2
Emission Unit Description: Paint Kitchen
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 3 Barrels

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-1028-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 43.5
Stack Diameter (inches): 20
Stack Exhaust Flow Rate (acfm): 7,000
Stack Temperature (°F): 70
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 97-A-1028-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.CC

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.CC1, 5.CC2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.CC1
Emission Unit Description: Paint Kitchen
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 3 Barrels

Emission Unit vented through this Emission Point: 5.CC2
Emission Unit Description: Paint Kitchen
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 3 Barrels

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-1029-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 43.5
Stack Diameter (inches): 20
Stack Exhaust Flow Rate (acfm): 7,000
Stack Temperature (°F): 70
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 97-A-1029-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.DD

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.DD

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.DD
Emission Unit Description: Paint Kitchen
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 3 Barrels

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-091-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 43.5
Stack Diameter (inches): 15
Stack Exhaust Flow Rate (acfm): 3,500
Stack Temperature (°F): 70
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 98-A-091-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.E

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.E

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.E
Emission Unit Description: Hot Water Heater
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.528 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.EE

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.EE

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.EE
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.052 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.FF

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.FF

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.FF
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.052 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.FLAME1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.FLAME1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.FLAME1 (Fugitive)
Emission Unit Description: Single Cutting Head Oxyacetylene
Torch Unit
Raw Material/Fuel: Sheet Steel
Rated Capacity: 660 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.G1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.G
Emissions Control Equipment ID Number:5.G
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.G
Emission Unit Description: Finish Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-1030-S2
567 IAC 23.3(2)"d"

Pollutant:PM₁₀
Emission Limit(s):1.22 lb./hr.
Authority for Requirement: Iowa DNR Construction Permit 97-A-1030-S2

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 97-A-1030-S2
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-1030-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project:

Equipment parameters:

The emission unit associated with this emission point will maintain a Graco, multi-color, precision mix system with two gun flush boxes, solvent meters, and solvent valves. The system will be supplied with a microprocessor which will control solvent, paint, and catalyst flow to a mixing tube adjacent to the emission unit and record the cumulative amount of the exact volume or weight of paint, solvent, or catalyst utilized in the emission unit. The system will be interlocked with the two Graco gun flush boxes, and the guns will be interlocked with the fans of the paint spray booth.

Authority for Requirement: Paragraph 3c. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The report shall evaluate the performance of the SEP and document the extent of VOC emissions reductions. Vermeer shall conduct cumulative mass balance calculations to determine the actual effect measured against the 1997 baseline of 122.94 tons of VOC emitted per year. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999. For additional reporting and recordkeeping see the Facility-Wide Conditions

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889
Iowa DNR Construction Permit 97-A-1030-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 40.5

Stack Diameter (inches): 42.0

Stack Exhaust Flow Rate (acfm): 29,000

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-1030-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Stack Testing:

Pollutant: Particulate Matter (TSP)

Stack Test to be Completed by (date): October 18, 2001

Test Method: Iowa Compliance Sampling Manual

Authority for Requirement: 567 IAC 22.108(3)

This stack test will represent the compliance testing for emission points 5.G1, 5G2, 6.M1, and 6.M2. In the event that a stack test of one of the other listed emission points is more suitable it may be tested to fulfill the requirements. Suitability will be determined by the Stack Test Observation Coordinator of the Air Quality Bureau Compliance Assistance Section. The higher of the results for emissions from the compliance stack testing of emission points 5.G1 and 5.G2 will be used to calculate actual emissions for the listed sources until such time as more recent data becomes available. If the source test does not demonstrate compliance this permit will be reopened to add a compliance plan and operation and maintenance requirements.

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Periodic Monitoring Requirements (continued):

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.G2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.G
Emissions Control Equipment ID Number:5.G
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.G
Emission Unit Description: Finish Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-1031-S2
567 IAC 23.3(2)"d"

Pollutant:PM₁₀
Emission Limit(s):1.22 lb./hr.
Authority for Requirement: Iowa DNR Construction Permit 97-A-1031-S2

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 97-A-1031-S2
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-1031-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project:

Equipment parameters:

The emission unit associated with this emission point will maintain a Graco, multi-color, precision mix system with two gun flush boxes, solvent meters, and solvent valves. The system will be supplied with a microprocessor which will control solvent, paint, and catalyst flow to a mixing tube adjacent to the emission unit and record the cumulative amount of the exact volume or weight of paint, solvent, or catalyst utilized in the emission unit. The system will be interlocked with the two Graco gun flush boxes, and the guns will be interlocked with the fans of the paint spray booth.

Authority for Requirement: Paragraph 3b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The report shall evaluate the performance of the SEP and document the extent of VOC emissions reductions. Vermeer shall conduct cumulative mass balance calculations to determine the actual effect measured against the 1997 baseline of 122.94 tons of VOC emitted per year. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999. For additional reporting and recordkeeping see the Facility-Wide Conditions

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889
Iowa DNR Construction Permit 97-A-1031-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 40.5

Stack Diameter (inches): 42.0

Stack Exhaust Flow Rate (acfm): 29,000

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-1031-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Stack Testing:

Pollutant: Particulate Matter (TSP)

Stack Test to be Completed by (date): October 18, 2001

Test Method: Iowa Compliance Sampling Manual

Authority for Requirement: 567 IAC 22.108(3)

This stack test will represent the compliance testing for emission points 5.G1, 5.G2, 6.M1, and 6.M2. In the event that a stack test of one of the other listed emission points is more suitable it may be tested to fulfill the requirements. Suitability will be determined by the Stack Test Observation Coordinator of the Air Quality Bureau Compliance Assistance Section. The higher of the results for emissions from the compliance stack testing of emission points 5.G1 and 5.G2 will be used to calculate actual emissions for the listed sources until such time as more recent data becomes available. If the source test does not demonstrate compliance this permit will be reopened to add a compliance plan and operation and maintenance requirements.

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Periodic Monitoring Requirements (continued):

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.GG

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.GG

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.GG
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.052 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limit(s):40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant:Particulate Matter (TSP)
Emission Limit(s):15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant:Particulate Matter (TSP)
Emission Limits:0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant:Sulfur Dioxide (SO₂)
Emission Limits:500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant:Nitrogen Oxides (NO_x)
Emission Limit(s):See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.H

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.H

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.H
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 6.33 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.HH

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.HH

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.HH
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.052 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.I

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.I

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.I
Emission Unit Description: Paint Oven
Raw Material/Fuel: Natural Gas
Rated Capacity: 1.5 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-1032-S1
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 97-A-1032-S1
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-1032-S1

Emission Limits (continued):

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-1032-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

A. This oven shall be fired by natural gas or propane only.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-1032-S1

Process throughput:

A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 31.5

Stack Diameter (inches): 14.0

Stack Exhaust Flow Rate (acfm): 1435

Stack Temperature (°F): 102

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-1032-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.II

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.II

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.II
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.052 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.J

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.J
Emissions Control Equipment ID Number:5.J
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.J
Emission Unit Description: Parts Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-1033-S2
567 IAC 23.3(2)"d"

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 97-A-1033-S2
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-1033-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project:

Equipment parameters:

The emission unit associated with this emission point will maintain a Graco, multi-color, precision mix system with two gun flush boxes, solvent meters, and solvent valves. The system will be supplied with a microprocessor which will control solvent, paint, and catalyst flow to a mixing tube adjacent to the emission unit and record the cumulative amount of the exact volume or weight of paint, solvent, or catalyst utilized in the emission unit. The system will be interlocked with the two Graco gun flush boxes, and the guns will be interlocked with the fans of the paint spray booth.

Authority for Requirement: Paragraph 3c. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The report shall evaluate the performance of the SEP and document the extent of VOC emissions reductions. Vermeer shall conduct cumulative mass balance calculations to determine the actual effect measured against the 1997 baseline of 122.94 tons of VOC emitted per year. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999. For additional reporting and recordkeeping see the Facility-Wide Conditions

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889
Iowa DNR Construction Permit 97-A-1033-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 43.8

Stack Diameter (inches): 42.0

Stack Exhaust Flow Rate (acfm): 20,000

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-1033-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.K

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.K

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.K
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 2.35 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.M

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.M

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.M
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.76 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.N

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.N

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.N
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 51.7 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.PLASMA1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.PLASMA1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.PLASMA1 (Fugitive)
Emission Unit Description: Single Head Plasma Cutting
Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 4,500 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.PLASMA2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.PLASMA2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.PLASMA2 (Fugitive)
Emission Unit Description: Single Head Plasma Cutting
Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 4,500 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.PLASMA3

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.PLASMA3
Emissions Control Equipment ID Number:5.PLASMA3
Emissions Control Equipment Description:Baghouse

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.PLASMA3 (Fugitive)
Emission Unit Description: Single Head Whitney Plasma Cutting Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 12,000 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.PLASMA4

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.PLASMA4
Emissions Control Equipment ID Number:5.PLASMA4
Emissions Control Equipment Description:Baghouse

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.PLASMA4 (Fugitive)
Emission Unit Description: Single Head Whitney Plasma Cutting Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 12,000 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.PRTWSH

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.PRTWSH

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.PRTWSH (Fugitive)
Emission Unit Description: Two (2) Safety Kleen Parts Washers
Raw Material/Fuel: Stoddard Solvent
Rated Capacity: 55 Gallons Solvent per Washer

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.R

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.R

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.R
Emission Unit Description: Hot Water Heater
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.528 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.T

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.T

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.T
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 51.7 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.TORCH

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.TORCH

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.TORCH (Fugitive)
Emission Unit Description: Seven (7) Single Cutting Head
Oxyacetylene Torch Units
Raw Material/Fuel: Sheet Steel
Rated Capacity: 840 inches of metal cut/hr. per Head

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.W

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.W

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.W
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 51.7 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.WELDING

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.WELDING

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.WELDING (Fugitive)
Emission Unit Description: 62 GMAW Units
Raw Material/Fuel: E70S Weld Wire
Rated Capacity: 19 lb. of Wire/hr. per Unit

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.WELDPLS

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 5.WELDPLS

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 5.WELDPLS (Fugitive)
Emission Unit Description: 45 Pulse Current GMAW Units
Raw Material/Fuel: E70S Weld Wire
Rated Capacity: 19 lb. of Wire/hr. per Unit

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.
This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.AB

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.AB

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.AB
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 2.75 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.AC

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.AC

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.AC
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 2.75 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.AD

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.AD

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.AD
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 2.75 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.AE

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.AE

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.AE
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 2.75 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.AF

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.AF

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.AF
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 2.75 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.AG

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.AG

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.AG
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 2.75 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.C

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.C

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.C
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 7.43 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.D

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.D

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.D
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 52.5 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity: 25%⁽¹⁾

(1) If visible emissions are observed that exceed the indicator opacity other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S3
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S3
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu

Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S3
567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S3

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S3

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S3

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 30.5

Stack Diameter (inches): 12

Stack Exhaust Flow Rate (acfm): 5,980

Stack Temperature (°F): 759

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S3

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.DD

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.DD

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.DD
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.05 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.F

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.F

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.F
Emission Unit Description: Paint Oven
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.9 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-1217-S3
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 98-A-1217-S3
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-1217-S3

Emission Limits (continued):

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-1217-S3

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

A. This oven shall be fired by natural gas or propane only.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 98-A-1217-S3

Process throughput:

A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 28.6

Stack Diameter (inches): 11.0

Stack Exhaust Flow Rate (acfm): 2,225

Stack Temperature (°F): 325

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-1217-S3

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.FF

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.FF

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Units vented through this Emission Point: 6.FF
Emission Unit Description: Paint Kitchen
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 3 Barrels

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-156-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 41
Stack Diameter (inches): 15
Stack Exhaust Flow Rate (acfm): 3,500
Stack Temperature (°F): 70
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 98-A-156-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.GG

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.GG

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Units vented through this Emission Point: 6.GG
Emission Unit Description: Paint Kitchen
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 3 Barrels

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-157-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 41
Stack Diameter (inches): 15
Stack Exhaust Flow Rate (acfm): 3,500
Stack Temperature (°F): 70
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 98-A-157-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.H

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.H

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.H
Emission Unit Description: Hot Water Heater
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.528 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.HH

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.HH
Emissions Control Equipment ID Number:6.HH
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.HH
Emission Unit Description: Primer Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-975-S3
567 IAC 23.3(2)"d"

Pollutant:PM₁₀
Emission Limit(s):0.9 lb./hr.
Authority for Requirement: Iowa DNR Construction Permit 97-A-975-S3

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 97-A-975-S3
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-975-S3

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project:

Equipment parameters:

The emission unit associated with this emission point will consist of the booth, an exhaust fan, and a duct extending from a sixteen (16) foot long by four (4) foot wide by six (6) foot deep exhaust pit to ten (10) feet above the peak of the roof. The emission unit will maintain a Binks microprocessor controlled, multi-color, precision mix system with two gun flush boxes, solvent meters, and solvent valves. The system will be panel mounted approximately five (5) feet from the nearest opening and will control solvent, paint, and catalyst flow to a mixing tube adjacent to the emission unit and record the cumulative amount of the exact volume or weight of primer, paint, solvent, or catalyst utilized in the emission unit. The system will be interlocked with the two Graco gun flush boxes, and the guns will be interlocked with the fan mix system and electronic generators of the paint spray booth.

Authority for Requirement: Paragraph 3e. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The report shall evaluate the performance of the SEP and document the extent of VOC emissions reductions. Vermeer shall conduct cumulative mass balance calculations to determine the actual effect measured against the 1997 baseline of 122.94 tons of VOC emitted per year. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999. For additional reporting and recordkeeping see the Facility-Wide Conditions

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889
Iowa DNR Construction Permit 97-A-975-S3

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

- Stack Height (feet): 44.5
- Stack Diameter (inches): 42.0
- Stack Exhaust Flow Rate (acfm): 20,000
- Stack Temperature (°F): 70
- Vertical, Unobstructed Discharge Required: Yes No
- Authority for Requirement: Iowa DNR Construction Permit 97-A-975-S3

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Stack Testing:

- Pollutant: Particulate Matter (TSP)
- Stack Test to be Completed by (date): October 18, 2001
- Test Method: Iowa Compliance Sampling Manual
- Authority for Requirement: 567 IAC 22.108(3)

This stack test will represent the compliance testing for emission points 6.HH and 6.S. In the event that a stack test of the other listed emission point is more suitable it may be tested to fulfill the requirements. Suitability will be determined by the Stack Test Observation Coordinator of the Air Quality Bureau Compliance Assistance Section. The results of the compliance stack testing will be used to calculate actual emissions for the listed sources until such time as more recent data becomes available. If the source test does not demonstrate compliance this permit will be reopened to add a compliance plan and operation and maintenance requirements.

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Periodic Monitoring Requirements (continued):

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.JJ

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.JJ

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.JJ
Emission Unit Description: Paint Booth Air Intake
Raw Material/Fuel: Natural Gas
Rated Capacity: 2.16 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.K

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.K

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.K
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 60.6 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity: 25%⁽¹⁾

(1) If visible emissions are observed that exceed the indicator opacity other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-300-S4
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 97-A-300-S4
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu

Authority for Requirement: Iowa DNR Construction Permit 97-A-300-S4
567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-300-S4

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-300-S4

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-300-S4

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 30.5

Stack Diameter (inches): 12

Stack Exhaust Flow Rate (acfm): 11,500

Stack Temperature (°F): 845

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-300-S4

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.KK

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.KK

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.KK
Emission Unit Description: Paint Booth Air Intake
Raw Material/Fuel: Natural Gas
Rated Capacity: 2.16 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.L

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.L

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.L
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.11 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.LL

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.LL

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.LL
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 60.6 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity: 25%⁽¹⁾

(1) If visible emissions are observed that exceed the indicator opacity other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-865-S2
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 98-A-865-S2

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu
Authority for Requirement: Iowa DNR Construction Permit 98-A-865-S2
567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-865-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-865-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 98-A-865-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 38

Stack Diameter (inches): 12

Stack Exhaust Flow Rate (acfm): 7,387

Stack Temperature (°F): 845

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-865-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.M1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.M
Emissions Control Equipment ID Number:6.M
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.M
Emission Unit Description: Finish Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-295-S3
567 IAC 23.3(2)"d"

Pollutant:PM₁₀
Emission Limit(s):1.22 lb./hr.
Authority for Requirement: Iowa DNR Construction Permit 97-A-295-S3

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 97-A-295-S3
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-295-S3

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project:

Equipment parameters:

The emission unit associated with this emission point will consist of the booth, an exhaust fan, and a duct extending from a sixteen (16) foot long by four (4) foot wide by six (6) foot deep exhaust pit to ten (10) feet above the peak of the roof. The emission unit will maintain a Binks microprocessor controlled, multi-color, precision mix system with two gun flush boxes, solvent meters, and solvent valves. The system will be panel mounted approximately five (5) feet from the nearest opening and will control solvent, paint, and catalyst flow to a mixing tube adjacent to the emission unit and record the cumulative amount of the exact volume or weight of primer, paint, solvent, or catalyst utilized in the emission unit. The system will be interlocked with the two Graco gun flush boxes, and the guns will be interlocked with the fan mix system and electronic generators of the paint spray booth.

Authority for Requirement: Paragraph 3e. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The report shall evaluate the performance of the SEP and document the extent of VOC emissions reductions. Vermeer shall conduct cumulative mass balance calculations to determine the actual effect measured against the 1997 baseline of 122.94 tons of VOC emitted per year. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999. For additional reporting and recordkeeping see the Facility-Wide Conditions

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889
Iowa DNR Construction Permit 97-A-295-S3

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 43.5

Stack Diameter (inches): 42.0

Stack Exhaust Flow Rate (acfm): 28,620

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-295-S3

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.M2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.M
Emissions Control Equipment ID Number:6.M
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.M
Emission Unit Description: Primer Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-296-S3
567 IAC 23.3(2)"d"

Pollutant:PM₁₀
Emission Limit(s):1.22 lb./hr.
Authority for Requirement: Iowa DNR Construction Permit 97-A-296-S3

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 97-A-296-S3
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-296-S3

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project:

Equipment parameters:

The emission unit associated with this emission point will consist of the booth, an exhaust fan, and a duct extending from a sixteen (16) foot long by four (4) foot wide by six (6) foot deep exhaust pit to ten (10) feet above the peak of the roof. The emission unit will maintain a Binks microprocessor controlled, multi-color, precision mix system with two gun flush boxes, solvent meters, and solvent valves. The system will be panel mounted approximately five (5) feet from the nearest opening and will control solvent, paint, and catalyst flow to a mixing tube adjacent to the emission unit and record the cumulative amount of the exact volume or weight of primer, paint, solvent, or catalyst utilized in the emission unit. The system will be interlocked with the two Graco gun flush boxes, and the guns will be interlocked with the fan mix system and electronic generators of the paint spray booth.

Authority for Requirement: Paragraph 3e. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The report shall evaluate the performance of the SEP and document the extent of VOC emissions reductions. Vermeer shall conduct cumulative mass balance calculations to determine the actual effect measured against the 1997 baseline of 122.94 tons of VOC emitted per year. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999. For additional reporting and recordkeeping see the Facility-Wide Conditions

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889
Iowa DNR Construction Permit 97-A-296-S3

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 43.5

Stack Diameter (inches): 42.0

Stack Exhaust Flow Rate (acfm): 28,620

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-296-S3

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.MM

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.MM

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.MM
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 60.6 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity: 25%⁽¹⁾

(1) If visible emissions are observed that exceed the indicator opacity other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-866-S2
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 98-A-866-S2
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu

Authority for Requirement: Iowa DNR Construction Permit 98-A-866-S2
567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 98-A-866-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 98-A-866-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 98-A-866-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 38

Stack Diameter (inches): 12

Stack Exhaust Flow Rate (acfm): 7,387

Stack Temperature (°F): 845

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-866-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.N

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.N
Emissions Control Equipment ID Number:6.N
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.N
Emission Unit Description: Parts Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-297-S2
567 IAC 23.3(2)"d"

Pollutant:PM₁₀
Emission Limit(s):1.22 lb./hr.
Authority for Requirement: Iowa DNR Construction Permit 97-A-297-S2

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 97-A-297-S2
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-297-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 40.2

Stack Diameter (inches): 42.0

Stack Exhaust Flow Rate (acfm): 16,000

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-297-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Stack Testing:

Pollutant: Particulate Matter (TSP)

Stack Test to be Completed by (date): October 18, 2001

Test Method: Iowa Compliance Sampling Manual

Authority for Requirement: 567 IAC 22.108(3)

The results of the compliance stack testing will be used to calculate actual emissions for this source until such time as more recent data becomes available. If the source test does not demonstrate compliance this permit will be reopened to add a compliance plan and operation and maintenance requirements.

The owner of this equipment or the owner’s authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Periodic Monitoring Requirements (continued):

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.PLASMA1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.PLASMA1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.PLASMA1 (Fugitive)
Emission Unit Description: Single Head Plasma Cutting
Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 4,500 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.PRTWSH

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.PRTWSH

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.PRTWSH (Fugitive)
Emission Unit Description: Two (2) Safety Kleen Parts Washers
Raw Material/Fuel: Stoddard Solvent
Rated Capacity: 55 Gallons Solvent per Washer

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.Q

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.Q

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.Q
Emission Unit Description: Hot Water Heater
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.528 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limit(s):40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant:Particulate Matter (TSP)
Emission Limit(s):15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant:Particulate Matter (TSP)
Emission Limits:0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant:Sulfur Dioxide (SO₂)
Emission Limits:500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant:Nitrogen Oxides (NO_x)
Emission Limit(s):See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.QQ

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.QQ

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.QQ
Emission Unit Description: Stage 1 Washer
Raw Material/Fuel: Hot Alkaline Cleaner
Rated Capacity: 300 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-868-S1
567 IAC 23.3(2)"d"

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.1 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 98-A-868-S1
567 IAC 23.4(13)

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project:

Equipment parameters:

As part of a multi-stage washer system the emission unit associated with this emission point will consist of a heated alkaline cleaner solution utilizing a sequenced manifold of spray nozzle tips to clean the metal parts in preparation for polyurethane coating. An extended drain zone will be provided to prevent chemical drag out to the second stage, a clean water rinse. A power and free conveyer system will be utilized to supply parts to and from the washer system. The entire washer system shall be approximately 150 feet long, 8 to 10 feet wide, and constructed of mild and stainless steel.

Operational Limits & Requirements (continued):

Authority for Requirement: Paragraph 3d. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542 District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542 District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The reports shall be submitted on or before March1, for the preceding calendar year, commencing on March 1, 1999.

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542 District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 36

Stack Diameter (inches): 12.0

Stack Exhaust Flow Rate (acfm): 6,000

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-868-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.R

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.R

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.R
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 4.68 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limit(s):40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant:Particulate Matter (TSP)
Emission Limit(s):15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant:Particulate Matter (TSP)
Emission Limits:0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant:Sulfur Dioxide (SO₂)
Emission Limits:500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant:Nitrogen Oxides (NO_x)
Emission Limit(s):See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.RR

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.RR

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.RR
Emission Unit Description: Stage 1 Burner
Raw Material/Fuel: Natural Gas
Rated Capacity: 3.8 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project:

Equipment parameters:

As part of a multi-stage washer system the emission unit associated with this emission point will consist of a 3.8 MMBtu/hr. heater for the hot alkaline washer system in Stage 1. An extended drain zone will be provided to prevent chemical drag out to the second stage, a clean water rinse. A power and free conveyer system will be utilized to supply parts to and from the washer system. The entire washer system shall be approximately 150 feet long, 8 to 10 feet wide, and constructed of mild and stainless steel.

Authority for Requirement: Paragraph 3d. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999.

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Process throughput:

A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.S

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.S
Emissions Control Equipment ID Number:6.S
Emissions Control Equipment Description:Paper Filter

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.S
Emission Unit Description: Finish Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limits:40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 96-A-1216-S4
567 IAC 23.3(2)"d"

Pollutant:Particulate Matter (TSP)
Emission Limit(s):0.01 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 96-A-1216-S4
567 IAC 23.4(13)

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 96-A-1216-S4

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 44.5

Stack Diameter (inches): 42.0

Stack Exhaust Flow Rate (acfm): 20,000

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 96-A-1216-S4

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.SS

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.SS

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.SS
Emission Unit Description: Stage 3 Burner
Raw Material/Fuel: Natural Gas
Rated Capacity: 2.5 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project:

Equipment parameters:

As part of a multi-stage washer system the emission unit associated with this emission point will consist of a 2.5 MMBtu/hr. heater for the hot iron phosphate washer system in Stage 3. An extended drain zone will be provided to prevent chemical drag out to the fourth stage, a clean water rinse. A power and free conveyer system will be utilized to supply parts to and from the washer system. The entire washer system shall be approximately 150 feet long, 8 to 10 feet wide, and constructed of mild and stainless steel.

Authority for Requirement: Paragraph 3d. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999.

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Process throughput:

A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.T

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.T

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.T
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.12 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.TORCH

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.TORCH

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.TORCH (Fugitive)
Emission Unit Description: Ten (10) Single Cutting Head
Oxyacetylene Torch Units
Raw Material/Fuel: Sheet Steel
Rated Capacity: 840 inches of metal cut/hr. per Head

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.TT

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.TT

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.TT
Emission Unit Description: Stage 5 Burner
Raw Material/Fuel: Natural Gas
Rated Capacity: 1.5 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project:

Equipment parameters:

As part of a multi-stage washer system the emission unit associated with this emission point will consist of a 1.5 MMBtu/hr. heater for the hot metal sealer washer system in Stage 5. A power and free conveyer system will be utilized to supply parts to and from the washer system. The entire washer system shall be approximately 150 feet long, 8 to 10 feet wide, and constructed of mild and stainless steel.

Authority for Requirement: Paragraph 3d. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999.

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Process throughput:

A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.UU

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.UU

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.UU
Emission Unit Description: Stage 5 Washer
Raw Material/Fuel: Hot Metal Sealer
Rated Capacity: 300 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 0.01 gr./dscf
Authority for Requirement: 567 IAC 23.4(13)

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project:

Equipment parameters:

As part of a multi-stage washer system the emission unit associated with this emission point will consist of a heated metal sealing solution utilizing a sequenced manifold of spray nozzle tips to prepare the surface of the metal parts for polyurethane coating. A power and free conveyer system will be utilized to supply parts to and from the washer system. The entire washer system shall be approximately 150 feet long, 8 to 10 feet wide, and constructed of mild and stainless steel.

Authority for Requirement: Paragraph 3d. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542 District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542 District Court, Marion County, Law No. LACV087889

Operational Limits & Requirements (continued):

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999.

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.VV

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.VV

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Units vented through this Emission Point: 6.VV
Emission Unit Description: Paint Kitchen
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 3 Barrels

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-155-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 41
Stack Diameter (inches): 15
Stack Exhaust Flow Rate (acfm): 3,500
Stack Temperature (°F): 70
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 98-A-155-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.W

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.W

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.W
Emission Unit Description: Paint Oven
Raw Material/Fuel: Natural Gas
Rated Capacity: 2.92 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity:⁽¹⁾

(1) If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-298-S3
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: Iowa DNR Construction Permit 97-A-298-S3
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-298-S3

Emission Limits (continued):

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-298-S3

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

A. This oven shall be fired by natural gas or propane only.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-298-S3

Process throughput:

A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 28.6

Stack Diameter (inches): 11.0

Stack Exhaust Flow Rate (acfm): 27,729

Stack Temperature (°F): 450

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-298-S3

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.WW

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.WW

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.WW
Emission Unit Description: Paint Kitchen
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 3 Barrels

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-858-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 41
Stack Diameter (inches): 15
Stack Exhaust Flow Rate (acfm): 3,500
Stack Temperature (°F): 70
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 98-A-858-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.WELDING

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.WELDING

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.WELDING (Fugitive)
Emission Unit Description: 19 GMAW Units
Raw Material/Fuel: E70S Weld Wire
Rated Capacity: 19 lb. of Wire/hr. per Unit

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.WELDPLS

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.WELDPLS

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.WELDPLS (Fugitive)
Emission Unit Description: 10 Pulse Current GMAW Units
Raw Material/Fuel: E70S Weld Wire
Rated Capacity: 19 lb. of Wire/hr. per Unit

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.
This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.XX

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 6.XX

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 6.XX
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 60.6 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity: 25%⁽¹⁾

(1) If visible emissions are observed that exceed the indicator opacity other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-864-S2
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 98-A-864-S2
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu

Authority for Requirement: Iowa DNR Construction Permit 98-A-864-S2
567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 98-A-864-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 98-A-864-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 98-A-864-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 38

Stack Diameter (inches): 12

Stack Exhaust Flow Rate (acfm): 7,387

Stack Temperature (°F): 845

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-864-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.B1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.B1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.B1
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.16 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.B2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.B2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.B2
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 1.0 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.B3

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.B3

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.B3
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 1.0 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.B4

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.B4

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.B4
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 1.0 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.D

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.D

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.D
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 7.43 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.FLAME1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.FLAME1
Emissions Control Equipment ID Number:7.FLAME1
Emissions Control Equipment Description:Water Table

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.FLAME1 (Fugitive)
Emission Unit Description: Single Cutting Head Oxyacetylene
Torch Unit
Raw Material/Fuel: Sheet Steel
Rated Capacity: 660 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.FLAME2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.FLAME2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.FLAME2 (Fugitive)
Emission Unit Description: Two (2) Cutting Head Oxyacetylene
Torch Unit
Raw Material/Fuel: Sheet Steel
Rated Capacity: 660 inches of metal cut/hr. per Head

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.FLAME3

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.FLAME3

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.FLAME3 (Fugitive)
Emission Unit Description: Single Cutting Head Oxyacetylene
Torch Unit
Raw Material/Fuel: Sheet Steel
Rated Capacity: 660 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.FLAME4

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.FLAME4

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.FLAME4 (Fugitive)
Emission Unit Description: Single Cutting Head Oxyacetylene
Torch Unit
Raw Material/Fuel: Sheet Steel
Rated Capacity: 660 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.FLAME5

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.FLAME5

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.FLAME5 (Fugitive)
Emission Unit Description: Single Cutting Head Oxyacetylene
Torch Unit
Raw Material/Fuel: Sheet Steel
Rated Capacity: 660 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.FLAME6

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.FLAME6

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.FLAME6 (Fugitive)
Emission Unit Description: Single Cutting Head Oxyacetylene
Torch Unit
Raw Material/Fuel: Sheet Steel
Rated Capacity: 660 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.G

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.G

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.G
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 50.5 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity: 25%⁽¹⁾

(1) If visible emissions are observed that exceed the indicator opacity other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-1112-S2
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 97-A-1112-S2
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu

Authority for Requirement: Iowa DNR Construction Permit 97-A-1112-S2
567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1112-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1112-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-1112-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 35

Stack Diameter (inches): 12

Stack Exhaust Flow Rate (acfm): 5,750

Stack Temperature (°F): 759

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-1112-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.H

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.H

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.H
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 60.6 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity: 25%⁽¹⁾

(1) If visible emissions are observed that exceed the indicator opacity other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-862-S2
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 98-A-862-S2
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu

Authority for Requirement: Iowa DNR Construction Permit 98-A-862-S2
567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 98-A-862-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 98-A-862-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 98-A-862-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 37

Stack Diameter (inches): 12

Stack Exhaust Flow Rate (acfm): 7.387

Stack Temperature (°F): 845

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-862-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.I

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.I

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.I
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 60.6 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity: 25%⁽¹⁾

(1) If visible emissions are observed that exceed the indicator opacity other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-863-S2
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 98-A-863-S2
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu

Authority for Requirement: Iowa DNR Construction Permit 98-A-863-S2
567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 98-A-863-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 98-A-863-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 98-A-863-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 38

Stack Diameter (inches): 12

Stack Exhaust Flow Rate (acfm): 7,387

Stack Temperature (°F): 845

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-863-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.K

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.K

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.K
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.1 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.L

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.L

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.L
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.135 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.LASER

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.LASER
Emissions Control Equipment ID Number:7.LASER
Emissions Control Equipment Description:Baghouse

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.LASER
Emission Unit Description: Four (4) Single Head Laser Cutting
Machines
Raw Material/Fuel: Sheet Steel
Rated Capacity: 4,800 in. of metal cut/hr. per Head

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity: 25%⁽¹⁾

(1) If visible emissions are observed that exceed the indicator opacity other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-456-S1
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 98-A-456-S1
567 IAC 23.3(2)"a"

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 98-A-456-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 25

Stack Diameter (inches): 18

Stack Exhaust Flow Rate (acfm): 4,800

Stack Temperature (°F): 68

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-456-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.M

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.M

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.M
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.08 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.N

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.N

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.N
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.08 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.O

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.O

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.O
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.08 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.P

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.P

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.P
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.1 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.PLASMA1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.PLASMA1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.PLASMA1 (Fugitive)
Emission Unit Description: Single Head Plasma Cutting
Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 4,500 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.PLASMA2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.PLASMA2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.PLASMA2 (Fugitive)
Emission Unit Description: Single Head Plasma Cutting
Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 4,500 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.PLASMA3

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.PLASMA3

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.PLASMA3 (Fugitive)
Emission Unit Description: Single Head Plasma Cutting
Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 4,500 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.PLASMA4

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.PLASMA4
Emissions Control Equipment ID Number:7.PLASMA4
Emissions Control Equipment Description:Baghouse

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.PLASMA4 (Fugitive)
Emission Unit Description: Single Head Whitney Plasma Cutting Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 12,000 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.PLASMA5

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.PLASMA5
Emissions Control Equipment ID Number:7.PLASMA5
Emissions Control Equipment Description:Water Table

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.PLASMA5 (Fugitive)
Emission Unit Description: Single Head Whitney Plasma Cutting Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 12,000 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.PLASMA6

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.PLASMA6
Emissions Control Equipment ID Number:7.PLASMA6
Emissions Control Equipment Description:Water Table

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.PLASMA6 (Fugitive)
Emission Unit Description: Single Head Whitney Plasma Cutting Machine
Raw Material/Fuel: Sheet Steel
Rated Capacity: 12,000 inches of metal cut/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.PRTWSH

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.PRTWSH

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.PRTWSH (Fugitive)
Emission Unit Description: Three (3) Safety Kleen Parts Washers
Raw Material/Fuel: Stoddard Solvent
Rated Capacity: 55 Gallons Solvent per Washer

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.Q

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.Q

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.Q
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.1 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.R

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.R

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.R
Emission Unit Description: One (1) Safety Kleen Partswasher
Raw Material/Fuel: Stoddard Solvent
Rated Capacity: 55 Gallons Solvent

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-869-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Reporting & Record keeping:

All records, as required in the following, shall be satisfactory for demonstrating compliance with all applicable operating limits.

Records shall be kept on-site for five years and shall be available for inspection by the Department. Records shall be maintained in a legible and orderly manner and shall indicate the following:

- A. The amount of any solvent used in this unit, in gallons. Calculate and record monthly and twelve (12) month rolling totals
- B. The VOC content of any solvent used in this partswasher, in pounds per gallon.

Authority for Requirement: Iowa DNR Construction Permit 98-A-869-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 25

Stack Diameter (inches): 12

Stack Exhaust Flow Rate (acfm): 1,000

Stack Temperature (°F): 68

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-869-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.S

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.S

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.S
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 2.75 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.T

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.T

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.T
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 7.50 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.TORCH

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.TORCH

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.TORCH (Fugitive)
Emission Unit Description: Ten (10) Single Cutting Head
Oxyacetylene Torch Units
Raw Material/Fuel: Sheet Steel
Rated Capacity: 840 inches of metal cut/hr. per Head

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.U

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.U

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.U
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.054 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.V

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.V

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.V
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.054 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.WELDING

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.WELDING

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.WELDING (Fugitive)
Emission Unit Description: 61 GMAW Units
Raw Material/Fuel: E70S Weld Wire
Rated Capacity: 19 lb. of Wire/hr. per Unit

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.WELDPLS

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 7.WELDPLS

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 7.WELDPLS (Fugitive)
Emission Unit Description: 47 Pulse Current GMAW Units
Raw Material/Fuel: E70S Weld Wire
Rated Capacity: 19 lb. of Wire/hr. per Unit

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.
This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 8.A1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 8.A1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 8.A1
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.4 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 8.A2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 8.A2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 8.A2
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.4 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 8.A3

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 8.A3

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 8.A3
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.4 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 8.A4

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 8.A4

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 8.A4
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.4 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 8.A5

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 8.A5

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 8.A5
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.4 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 8.A6

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 8.A6

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 8.A6
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.4 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 8.A7

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 8.A7

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 8.A7
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.4 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 8.A8

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 8.A8

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 8.A8
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.4 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 8.A9

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 8.A9

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 8.A9
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.4 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 8.A10

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 8.A10

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 8.A10
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.4 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 8.A11

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 8.A11

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 8.A11
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.4 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 8.A12

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 8.A12

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 8.A12
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.4 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 8.B

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): 8.B

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: 8.B
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 60.6 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity: 25%⁽¹⁾

(1) If visible emissions are observed that exceed the indicator opacity other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 98-A-861-S2
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 98-A-861-S2
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu

Authority for Requirement: Iowa DNR Construction Permit 98-A-861-S2
567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 98-A-861-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 98-A-861-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 98-A-861-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 27

Stack Diameter (inches): 12

Stack Exhaust Flow Rate (acfm): 7,386.8

Stack Temperature (°F): 845

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-861-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: DSLTANK2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): TANK2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: TANK2
Emission Unit Description: Storage Tank (Fugitive)
Raw Material/Fuel: #2 Diesel Fuel
Rated Capacity: 1,000 gallons

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: DSLTANK4

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): TANK4

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: TANK4
Emission Unit Description: Storage Tank (Fugitive)
Raw Material/Fuel: #2 Diesel Fuel
Rated Capacity: 1,000 gallons

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: DSLTANK8

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): TANK8

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: TANK8
Emission Unit Description: Storage Tank (Fugitive)
Raw Material/Fuel: #2 Diesel Fuel
Rated Capacity: 1,000 gallons

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: DSLTANK9

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): TANK9

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: TANK9 (Fugitive)
Emission Unit Description: Storage Tank
Raw Material/Fuel: #2 Diesel Fuel
Rated Capacity: 1,000 gallons

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: GASTANK3

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): TANK3

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: TANK3 (Fugitive)
Emission Unit Description: Storage Tank
Raw Material/Fuel: Gasoline
Rated Capacity: 1,000 gallons

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: GASTANK7

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): TANK7

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: TANK7
Emission Unit Description: Storage Tank (Fugitive)
Raw Material/Fuel: Gasoline
Rated Capacity: 1,000 gallons

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: HB.A

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): HB.A

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: HB.A
Emission Unit Description: Production Engine Testing Unit
Raw Material/Fuel: #2 Diesel Fuel and Gasoline
Rated Capacity: 50.5 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limits: 40 %
Indicator Opacity: 25%⁽¹⁾

(1) If visible emissions are observed that exceed the indicator opacity other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: Iowa DNR Construction Permit 97-A-1113-S2
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 97-A-1113-S2
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu

Authority for Requirement: Iowa DNR Construction Permit 97-A-1113-S2
567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1113-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permit 97-A-1113-S2

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process Throughput:

- A. The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Reporting & Recordkeeping: See Facility-Wide Emission and Operational Limits

Authority for Requirement: Iowa DNR Construction Permit 97-A-1113-S2

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 38

Stack Diameter (inches): 12

Stack Exhaust Flow Rate (acfm): 5,750

Stack Temperature (°F): 759

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-1113-S2

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Opacity Monitoring:

The facility shall observe the opacity weekly during a period when the emission unit associated with this emission point is at or near full capacity and record the reading indicating if visible emissions were observed. The records shall be maintained for five years. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: P.A1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): P.A1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: P.A1
Emission Unit Description: Non Production Heating Unit
Raw Material/Fuel: Used Oil
Rated Capacity: 0.00328 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: P.A2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): P.A2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: P.A2
Emission Unit Description: Non Production Heating Unit
Raw Material/Fuel: Used Oil
Rated Capacity: 0.00328 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: P.C1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): P.C1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: P.C1
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.4 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limit(s):40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant:Particulate Matter (TSP)
Emission Limit(s):15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant:Particulate Matter (TSP)
Emission Limits:0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant:Sulfur Dioxide (SO₂)
Emission Limits:500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant:Nitrogen Oxides (NO_x)
Emission Limit(s):See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: P.C2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): P.C2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: P.C2
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.4 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: P.D1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): P.D1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: P.D1
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.4 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: P.D2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): P.D2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: P.D2
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.4 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limit(s):40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant:Particulate Matter (TSP)
Emission Limit(s):15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant:Particulate Matter (TSP)
Emission Limits:0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant:Sulfur Dioxide (SO₂)
Emission Limits:500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant:Nitrogen Oxides (NO_x)
Emission Limit(s):See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: P.D3

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): P.D3

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: P.D3
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.4 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: P.E

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): P.E

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: P.E
Emission Unit Description: Non-Production Heating Unit
Raw Material/Fuel: Propane (LPG) or Natural Gas
Rated Capacity: 0.4 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Opacity
Emission Limit(s):40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant:Particulate Matter (TSP)
Emission Limit(s):15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant:Particulate Matter (TSP)
Emission Limits:0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant:Sulfur Dioxide (SO₂)
Emission Limits:500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant:Nitrogen Oxides (NO_x)
Emission Limit(s):See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant:Volatile Organic Compounds (VOC)
Emission Limit:See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: P.O

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): P.O1, P.O2

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: P.O1 (Fugitive)
Emission Unit Description: One (1) Safety Kleen Parts Washer
Raw Material/Fuel: MAK Solvent
Rated Capacity: 10 Gallons Solvent

Emission Unit vented through this Emission Point: P.O2 (Fugitive)
Emission Unit Description: One (1) Safety Kleen Parts Washer
Raw Material/Fuel: MAK Solvent
Rated Capacity: 20 Gallons Solvent

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 99-A-685

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: P.PRTWSH

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): P.PRTWSH

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: P.PRTWSH (Fugitive)
Emission Unit Description: Four (4) Safety Kleen Parts Washers
Raw Material/Fuel: Stoddard Solvent
Rated Capacity: 55 Gallons Solvent per Washer

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: P.TORCH

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): P.TORCH

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: P.TORCH (Fugitive)
Emission Unit Description: Two (2) Single Cutting Head
Oxyacetylene Torch Units
Raw Material/Fuel: Sheet Steel
Rated Capacity: 840 inches of metal cut/hr. per Head

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: P.WELDING

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): P.WELDING

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: P.WELDING (Fugitive)
Emission Unit Description: 2 GMAW Units
Raw Material/Fuel: E70S Weld Wire
Rated Capacity: 19 lb. of Wire/hr. per Unit

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.
This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: Q.A

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): Q.A

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: Q.A
Emission Unit Description: Non Production Heating Unit
Raw Material/Fuel: Used Oil
Rated Capacity: 0.00328 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: W.A1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): W.A1

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: W.A1
Emission Unit Description: Non Production Heating Unit
Raw Material/Fuel: Used Oil
Rated Capacity: 0.00328 gal./hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.1 gr./dscf
Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 2.5 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: W.B

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): W.B

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: W.B
Emission Unit Description: Hotsey Washer
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.657 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limits: 0.8 lb./MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: W.E

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): W.E

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: W.E
Emission Unit Description: Paint Hook Burn-Off Oven
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.78 MMBtu/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: Iowa DNR Construction Permit 98-A-072-S1
567 IAC 23.4(12)"b"

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 15.3 lb./MMCF of LPG or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter (TSP)
Emission Limit(s): 0.35 gr./dscf⁽¹⁾
(1) Adjusted to 12% CO₂
Authority for Requirement: Iowa DNR Construction Permit 98-A-072-S1
567 IAC 23.4(12)"a"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit(s): See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-072-S1

Emission Limits (continued):

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-072-S1

Compliance Testing Requirements

TSP.....Iowa Compliance Sampling Manual

The owner shall verify compliance with the emission limitations contained in Construction Permit 98-A-072-S1 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the startup date of the proposed equipment. The test shall be conducted with the equipment operating in a manner representative of full rated capacity. Failure to test at this maximum may be cause to limit the source to operating at the level at which the compliance tests were conducted.

The owner shall furnish the DNR the following written notifications:

- 1. The date of intended startup at least ten (10) days before the equipment or control equipment involved is placed into operation.
- 2. The actual date of startup postmarked within fifteen (15) days following the start of operation.

Authority for Requirement: Iowa DNR Construction Permit 98-A-072-S1

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project:

Equipment parameters:

The emission unit associated with this emission point will consist of a high temperature, natural gas fired oven for the destruction of paint built up on the hooks that transport parts to the paint lines at the facility. This will include a 36 foot by 16 foot insulated addition to the existing waste management building to house one Blu Surf Model No. 6506 Wash Booth Unit and one Model No. 5505 Burnoff Oven together with the necessary electrical system for the equipment, gas lines for the oven, drain lines for the wash water discharge, multilevel footings, foundation, and concrete flooring to support and allow for operation of the oven. The hook burnoff oven system will consist of one batch burnoff oven, Model No. 5506 with a top mount after burner.

Operational Limits & Requirements (continued):

The oven will include a primary and secondary water suppression system to prevent overheating during oven burning cycles. A modulating gas valve system will be supplied for the primary burner to maintain consistent, efficient thermal operating temperatures, operating at an approximate 540,000 Btu per hour level with a potential for 780,000 Btu per hour maximum. Each time the oven is started, the water suppression system will automatically turn on for approximately 30 seconds. A roller track will be installed in the floor to transport carts from the oven to the wash booth unit. The wash unit will be supplied with a power washer operating at 2 gallons per minute at 1,000 pounds per square inch pressure for cleaning the ash from the hooks, carts and racks after burning.

Authority for Requirement: Paragraph 3a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999.

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Process throughput:

A. The quantity of paint incinerated in this source shall not exceed 27.5 pounds per hour.

B. This source shall be fired by natural gas or propane only.

Reporting & Recordkeeping: See Facility-Wide Emission Limits

Authority for Requirement: Iowa DNR Construction Permit 98-A-072-S1

Process throughput:

A. The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 35.2

Stack Diameter (inches): 6

Stack Exhaust Flow Rate (acfm): 1,578

Stack Temperature (°F): 1,322

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-072-S1

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: W.F1

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): W.F

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: W.F
Emission Unit Description: Waste Solvent Still
Raw Material/Fuel: Recovered Paints, etc.
Rated Capacity: 4.58 gallons/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Reporting & Record keeping: See Facility-Wide Conditions and include:
A. A monthly and a twelve (12) month rolling total of the amount of solvent recovered, in gallons.
Authority for Requirement: Iowa DNR Construction Permit 99-A-340

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 10

Stack Diameter (inches): 2

Stack Exhaust Flow Rate (acfm): Natural draft

Stack Temperature (°F): Ambient

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 99-A-340

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: W.F2

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): W.F

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: W.F
Emission Unit Description: Waste Solvent Still
Raw Material/Fuel: Recovered Paints, etc.
Rated Capacity: 4.58 gallons/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit(s): 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Operational Limits & Requirements:

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Reporting & Record keeping: See Facility-Wide Conditions and include:
A. A monthly and a twelve (12) month rolling total of the amount of solvent recovered, in gallons.
Authority for Requirement: Iowa DNR Construction Permit 99-A-340

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 10

Stack Diameter (inches): 2

Stack Exhaust Flow Rate (acfm): Natural draft

Stack Temperature (°F): Ambient

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 99-A-341

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: W.H

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): W.H, W.F

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: W.H
Emission Unit Description: Aerosol Can Crusher
Raw Material/Fuel: Aerosol Cans
Rated Capacity: 120 cans/hr.

Emission Unit vented through this Emission Point: W.F
Emission Unit Description: Waste Solvent Still
Raw Material/Fuel: Recovered Paints, etc.
Rated Capacity: 4.58 gallons/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 99-A-691

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Additional Requirements:

This emission point shall conform to the following conditions.

The source is to be connected to the stack of the following detailed description.

Stack Height (feet): 35
Stack Diameter (inches): 12
Stack Exhaust Flow Rate (acfm): 3,500
Stack Temperature (°F): Ambient
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 99-A-691

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: W.M

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): W.M

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: W.M (Fugitive)
Emission Unit Description: One (1) Safety Kleen Parts Washer
Raw Material/Fuel: Stoddard Solvent
Rated Capacity: 55 Gallons Solvent

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: F.SAND

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): F.SAND

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: F.SAND (Fugitive)
Emission Unit Description: Sand Blasting Unit
Raw Material/Fuel: Silica Sand
Rated Capacity: 600 lb. Sand/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: F.SODA

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): F.SODA

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: F.SODA (Fugitive)
Emission Unit Description: Soda Blasting Unit
Raw Material/Fuel: Abrasive Soda
Rated Capacity: 120 lb. Soda/hr.

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant:Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered , repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.
This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: PROPANE

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): PROPANE

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: PROPANE
Emission Unit Description: Three Storage Tanks (Fugitive)
Raw Material/Fuel: Propane
Rated Capacity: 6,000 gallons per Tank

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: PROPYLENE

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): PROPYLENE

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: PROPYLENE
Emission Unit Description: Three Storage Tanks (Fugitive)
Raw Material/Fuel: Propylene
Rated Capacity: 1,000 gallons per Tank

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: OILTANK

Associated Equipment

Associated Emission Unit ID Numbers (if multiple units vent thru this EP): OILTANK

Applicable Requirements

(If more than one emission unit vents through this emission point subdivide the applicable requirements by emission unit.)

Emission Unit vented through this Emission Point: OILTANK (Fugitive)
Emission Unit Description: Storage Tank
Raw Material/Fuel: Used Oil
Rated Capacity: 5,000 gallons

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.):

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-003-S1

Compliance Plan:

The owner/operator of this equipment shall comply with the following applicable requirements.

This point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

Periodic Monitoring Requirements:

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

IV. General Conditions

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code chapter 22.

G1. Duty to Comply

1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. *567 IAC 22.108(9)"a"*
2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. *567 IAC 22.105(2)"h"3.*
3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. *567 IAC 22.108(1)"b"*
4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. *567 IAC 22.108(14)*
5. It shall not be a defense for a permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. *567 IAC 22.108(9)"b"*

G2. Permit Expiration

1. Except as provided in 567 IAC 22.104, the expiration of this permit terminates the permittee's right to operate unless a timely and complete application has been submitted for renewal. Any testing required for renewal shall be completed before the application is submitted. *567 IAC 22.116(2)*
2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall present or mail the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, 7900 Hickman Rd, Suite #1, Urbandale, Iowa 50322, four or more copies of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. The definition of a complete application is as indicated in 567 IAC 22.105(2). *567 IAC 22.105*

G3. Certification Requirement for Title V Related Documents

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. *567 IAC 22.107(4)*

G4. Annual Compliance Certification

On March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the

basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. *567 IAC 22.108 (15)"e"*

G5. Semi-Annual Monitoring Report

On March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 22.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. *567 IAC 22.108 (5)*.

G6. Annual Fee

1. The permittee is required under subrule 567 IAC 22.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
3. The following forms shall be submitted annually by March 31 documenting actual emissions for the previous calendar year.
 - a. Form 1.0 "Facility Identification";
 - b. Form 4.0 "Emissions unit-actual operations and emissions" for each emission unit;
 - c. Form 5.0 "Title V annual emissions summary/fee"; and
 - d. Part 3 "Application certification."
4. The fee shall be submitted annually by July 1. The fee shall be submitted with the following forms:
 - a. Form 1.0 "Facility Identification";
 - b. Form 5.0 "Title V annual emissions summary/fee";
 - c. Part 3 "Application certification."
5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.

7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.

8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 22.115(1)"d".

G7. Inspection of Premises, Records, Equipment, Methods and Discharges

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. 567 IAC 22.108 (15)"b"

G8. Duty to Provide Information

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. 567 IAC 22.108 (9)"e"

G9. General Maintenance and Repair Duties

The owner or operator of any air emission source or control equipment shall:

1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
2. Remedy any cause of excess emissions in an expeditious manner.
3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. 567 IAC 24.2(1)

G10. Recordkeeping Requirements for Compliance Monitoring

1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records:
 - a. The date, place and time of sampling or measurements
 - b. The date the analyses were performed.
 - c. The company or entity that performed the analyses.
 - d. The analytical techniques or methods used.
 - e. The results of such analyses; and

- f. The operating conditions as existing at the time of sampling or measurement.
 - g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)
2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.
3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:
- a. Comply with all terms and conditions of this permit specific to each alternative scenario.
 - b. Maintain a log at the permitted facility of the scenario under which it is operating.
 - c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. *567 IAC 22.108(4), 567 IAC 22.108(12)*

G11. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. *567 IAC 22.108(6)*

G12. Hazardous Release

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 281-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in *567 IAC 131.2(2), 567 IAC Chapter 131-State Only*

G13. Excess Emissions and Excess Emissions Reporting Requirements

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control measures. Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time. An expeditious manner is the time

necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

2. Excess Emissions Reporting

a. Oral Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An oral report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1)) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable visible emission standard by more than 10 percent opacity. The oral report may be made in person or by telephone and shall include as a minimum the following:

- i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and expected duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps being taken to remedy the excess emission.
- vi. The steps being taken to limit the excess emission in the interim period.

b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required oral reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:

- i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.
- vi. The steps that were taken to limit the excess emission.
- vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. *567 IAC 24.1(1)-567 IAC 24.1(4)*

3. Emergency Defense for Excess Emissions. For the purposes of this permit, an “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which requires immediate

corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The facility at the time was being properly operated;
- c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and
- d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. *567 IAC 22.108(16)*

G14. Permit Deviation Reporting Requirements

A deviation is an instance when any condition of this permit is violated. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above. Any violation of an applicable requirement shall be reported to the appropriate regional office by telephone or in person within seven (7) days of the violation. This report shall include the probable cause of such violation, and any corrective actions or preventive measures taken. Any other deviations shall be documented in the semi-annual report. *567 IAC 22.108(5)"b"*.

G15. Notification Requirements for Sources That Become Subject to NSPS and HAP Regulations

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants) or section 112 of the Act. This notification shall be submitted in writing to the department 30 days before the source becomes subject to the afore-mentioned standard or other requirement. *40 CFR part 63.9 as adopted in 567 IAC 23.1(4); 40 CFR part 60.7 as adopted in 567 IAC 23.1(2)*

G16. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification

1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:
 - a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 22.
 - b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);

- c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
- d. The changes are not subject to any requirement under Title IV of the Act.
- e. The changes comply with all applicable requirements.
- f. For such a change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:
 - i. A brief description of the change within the permitted facility,
 - ii. The date on which the change will occur,
 - iii. Any change in emission as a result of that change,
 - iv. The pollutants emitted subject to the emissions trade
 - v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.
 - vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
 - vii. Any permit term or condition no longer applicable as a result of the change.

567 IAC 22.110.(1)

- 2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. *567 IAC 22.110.(2)*
- 3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 22.110(1). *567 IAC 22.110.(3)*
- 4. The permit shield provided in subrule 22.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. *567 IAC 22.110.(4)*
- 5. Aggregate Insignificant Emissions. The permittee shall not construct, establish or operate any new insignificant activities or modify any existing insignificant activities in such a way that the emissions from these activities no longer meet the criteria of aggregate insignificant emissions. If the aggregate insignificant emissions are expected to be exceeded, the permittee shall submit the appropriate permit modification and receive approval prior to making any change. *567 IAC 22.103.(2)*
- 6. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. *567 IAC 22.108 (11)*

G17. Duty to Modify a Title V Permit

1. Administrative Amendment.

- a. An administrative permit amendment is a permit revision that is required to do any of the following:

- i. Correct typographical errors
 - ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - iii. Require more frequent monitoring or reporting by the permittee; or
 - iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.
- b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.
- c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.
2. Minor Permit Modification.
- a. Minor permit modification procedures may be used only for those permit modifications that do any of the following:
 - i. Do not violate any applicable requirements
 - ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit.
 - iii. Do not require or change a case by case determination of an emission limitation or other standard, or increment analysis.
 - iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act.;
 - v. Are not modifications under any provision of Title I of the Act; and
 - vi. Are not required to be processed as significant modification.
 - b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:
 - i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs.
 - ii. The permittee's suggested draft permit
 - iii. Certification by a responsible official, pursuant to 567 IAC 22.107(4), that the proposed modification meets the criteria for use of a minor permit modification procedures and a request that such procedures be used; and
 - iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 107(7).
 - c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this

change and until the director takes any of the actions specified in 567 IAC 22.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, existing permit term terms and conditions it seeks to modify may subject the facility to enforcement action.

3. Significant Permit Modification. Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 22, including those for applications, public participation, review by affected states, and review by the administrator, and those requirements that apply to Title V issuance and renewal. *567 IAC 22.111-567 IAC 22.113*

The permittee shall submit an application for a significant permit modification at least 6 months, but not more than 18 months prior to the date of the proposed modification. *567 IAC 22.105(1)a(2)*

G18. Duty to Obtain Construction Permits

Unless exempted under 567 IAC 22.1(2), the permittee must not construct, install, reconstruct, or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, conditional permit, or permit pursuant to 567 IAC 22.8, or permits required pursuant to 567 IAC 22.4 and 567 IAC 22.5. Such permits shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source. *567 IAC 22.1(1)*

G19. Asbestos

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when conducting any renovation or demolition activities at the facility. *IAC 23.1(3)"a", and 567 IAC 23.2*

G20. Open Burning

The permittee is prohibited from conducting open burning, except as may be allowed by 567 IAC 23.2. *567 IAC 23.2 except 23.2(3)"h"; 567 IAC 23.2(3)"h" - State Only*

G21. Acid Rain (Title IV) Emissions Allowances

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited.

Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. *567 IAC 22.108(7)*

G22. Stratospheric Ozone and Climate Protection (Title VI) Requirements

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

- a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.
 - b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
 - c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.
2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.
3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,
5. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *40 CFR part 82*

G23. Permit Reopenings

- 1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and

reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. *567 IAC 22.108(9)"c"*

2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as practicable, but not later than 18 months after the promulgation of such standards and regulations.

a. Reopening and revision on this ground is not required if the permit has a remaining term of less than three years;

b. Reopening and revision on this ground is not required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to June 25, 1993.

c. Reopening and revision on this ground is not required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. *567 IAC 22.108(17)"a", 567 IAC 22.108(17)"b"*

3. A permit shall be reopened and revised under any of the following circumstances:

a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to June 25, 1993, provided that the reopening may be stayed pending judicial review of that determination;

b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Title V permit;

c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.

d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements. *567 IAC 22.114(1)*

4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. *567 IAC 22.114(2)*

G24. Permit Shield

Compliance with the conditions of this permit shall be deemed compliance with the applicable requirements included in this permit as of the date of permit issuance.

This permit shield shall not alter or affect the following:

1. The provisions of section 303 of the Act (emergency orders), including the authority of the administrator under that section;
2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Act;
4. The ability of the department or the administrator to obtain information from the facility pursuant to section 114 of the Act. *IAC 22.108 (18)*

G25. Severability

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. *567 IAC 22.108 (8)*

G26. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. *567 IAC 22.108 (9)"d"*

G27. Transferability

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought to determine transferability of the permit. *567 IAC 22.111 (1)"d"*

G28. Disclaimer

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. *567 IAC 22.3(3)"c"*

G29. Notification and Reporting Requirements for Stack Tests or Monitor Certification

The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with an applicable requirement. For the department to consider test results a valid demonstration of compliance with applicable rules or a permit condition, such notice shall be given. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. Unless specifically waived by the department's stack test contact, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. The department may accept a testing protocol in lieu of a pretest meeting. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated.

Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator
Iowa DNR, Air Quality Bureau
7900 Hickman Road, Suite #1
Urbandale, IA 50322
(515) 242-6001

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program.

567 IAC 25.1(7)"a", 567 IAC 25.1(9)

G30. Prevention of Air Pollution Emergency Episodes

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons. *567 IAC 26.1(1)*

G31. Contacts List

The current address and phone number for reports and notifications to the EPA administrator is:

Chief of Air Permits
EPA Region 7
Air Permits and Compliance Branch
901 N. 5th St.
Kansas City, KS 66101
(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite #1
Urbandale, IA 50322
(515) 242-5100

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

Field Office 1

909 West Main – Suite 1
Manchester, IA 52057
(319) 927-2640

Field Office 2

P.O. Box 1443
2300-15th St., SW
Mason City, IA 50401
(515) 424-4073

Field Office 3

1900 N. Grand Ave.
Spencer, IA 51301
(712) 262-4177

Field Office 4

706 Sunnyside
Atlantic, IA 50022
(712) 243-1934

Field Office 5

607 East 2nd St.
Des Moines, IA 50309
(515) 281-9069

Field Office 6

1004 W. Madison
Washington, IA 52353
(319) 653-2135

Polk County Public Works Dept.

Air Quality Division
5895 NE 14th St.
Des Moines, IA 50313
(515) 286-3351

Linn County Health Dept.

Air Pollution Control Division
501 13th St., NW
Cedar Rapids, IA 52405
(319) 398-3551

V. Appendix

State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542,
District Court, Marion County, Law No. LACV087889 (attached)

**Iowa Department of Natural Resources
Title V Operating Permit**

Name of Permitted Facility: Vermeer Manufacturing Co.
Facility Location: 1210 Vermeer Road East
Pella, IA 50219

Air Quality Operating Permit Number: 99-TV-052-M001
Expiration Date: October 18, 2004

EIQ Number: 92-5246
Facility File Number: 63-02-004

Responsible Official

Kurt Langel
Vice President of Human Resources
1210 Vermeer Road East
Pella, IA 50219
Phone #: (641) 628-3141

Permit Contact Person for the Facility

Bob Dougherty
Environmental Engineering Manager
1210 Vermeer Road East
Pella, IA 50219
Phone #: (641) 621-7821

This permit is issued in accordance with 567 Iowa Administrative Code Chapter 22, and is issued subject to the terms and conditions contained in this permit.

For the Director of the Department of Natural Resources

Douglas A. Campbell, Supervisor of Air Operating Permits Section

Date

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**V. Appendix A: State of Iowa, ex rel.
Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889**

VI. Appendix B: DNR Air Quality Policy 3-b-08, Opacity Limits

Abbreviations

acfm.....	actual cubic feet per minute
bbl.....	barrel
CFR.....	Code of Federal Regulations
°F.....	degrees Fahrenheit
EIQ.....	emissions inventory questionnaire
gal/hr.....	gallons per hour
gr/dscf.....	grains per dry standard cubic foot
IAC.....	Iowa Administrative Code
Iowa DNR.....	Iowa Department of Natural Resources
LPG.....	liquified petroleum gas (propane)
MMCF.....	million cubic feet
MSDS.....	Material Safety Data Sheet
NAAQS.....	National Ambient Air Quality Standard
NG.....	natural gas
NSPS.....	New Source Performance Standard
ppm.....	parts per million
ppmv.....	parts per million by volume
lb/hr.....	pounds per hour
lb/MMBtu.....	pounds per million British thermal units
scfm.....	standard cubic feet per minute
SEP.....	Supplemental Environmental Project
TPY.....	tons per year
VE.....	visible emissions

Pollutants

PM ₁₀	particulate matter less than ten (10) microns in size
PM.....	particulate matter
SO ₂	sulfur dioxide
NO _x	nitrogen oxide
VOC.....	volatile organic compound
CO.....	carbon monoxide
HAP.....	hazardous air pollutant

I. Facility Description and Equipment List

Facility Name: Vermeer Manufacturing Co.

Permit Number: 99-TV-052-M001

Facility Description: Manufacturer of Farm Machinery and Equipment and Construction Equipment

Equipment List

A. Cutting Equipment

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description
4.Laser*	4.Laser	Laser Cutting Unit
7.Laser	7.Laser	Laser Cutting Unit
2.Flame1**	2.Flame1	Flame Cutting Unit
2.Flame2	2.Flame2	Flame Cutting Unit
3.Flame4	3.Flame4	Flame Cutting Unit
3.Flame5	3.Flame5	Flame Cutting Unit
4.Flame2	4.Flame2	Flame Cutting Unit
4.Flame3	4.Flame3	Flame Cutting Unit
5.Flame1	5.Flame1	Flame Cutting Unit
7.Flame2	7.Flame2	Flame Cutting Unit
7.Flame3	7.Flame3	Flame Cutting Unit
7.Flame4	7.Flame4	Flame Cutting Unit
7.Flame5	7.Flame5	Flame Cutting Unit
7.Flame6	7.Flame6	Flame Cutting Unit
1.Flame1	1.Flame1	Flame Cutting Unit
1.Flame2	1.Flame2	Flame Cutting Unit
3.Flame1	3.Flame1	Flame Cutting Unit
3.Flame2	3.Flame2	Flame Cutting Unit
3.Flame3	3.Flame3	Flame Cutting Unit
4.Flame1	4.Flame1	Flame Cutting Unit
7.Flame1	7.Flame1	Flame Cutting Unit

* The first number is the number of the building where the point/unit is located. (For example, Emission Point/Unit 4.Laser is located in Building 4.)

** The double border around certain equipment in this list indicates that the enclosed equipment is grouped in a table in the Emission Point-Specific Conditions section of this permit.

A. Cutting Equipment (continued)

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description
1.Plasma1	1.Plasma1	Plasma Cutting Unit
2.Plasma1	2.Plasma1	Plasma Cutting Unit
2.Plasma2	2.Plasma2	Plasma Cutting Unit
3.Plasma1	3.Plasma1	Plasma Cutting Unit
3.Plasma2	3.Plasma2	Plasma Cutting Unit
3.Plasma3	3.Plasma3	Plasma Cutting Unit
4.Plasma1	4.Plasma1	Plasma Cutting Unit
4.Plasma2	4.Plasma2	Plasma Cutting Unit
4.Plasma3	4.Plasma3	Plasma Cutting Unit
5.Plasma1	5.Plasma1	Plasma Cutting Unit
5.Plasma2	5.Plasma2	Plasma Cutting Unit
6.Plasma1	6.Plasma1	Plasma Cutting Unit
7.Plasma1	7.Plasma1	Plasma Cutting Unit
7.Plasma2	7.Plasma2	Plasma Cutting Unit
7.Plasma3	7.Plasma3	Plasma Cutting Unit
2.Plasma3	2.Plasma3	Plasma Cutting Unit
2.Plasma4	2.Plasma4	Plasma Cutting Unit
2.Plasma5	2.Plasma5	Plasma Cutting Unit
3.Plasma4	3.Plasma4	Plasma Cutting Unit
3.Plasma5	3.Plasma5	Plasma Cutting Unit
4.Plasma4	4.Plasma4	Plasma Cutting Unit
4.Plasma5	4.Plasma5	Plasma Cutting Unit
5.Plasma3	5.Plasma3	Plasma Cutting Unit
5.Plasma4	5.Plasma4	Plasma Cutting Unit
7.Plasma4	7.Plasma4	Plasma Cutting Unit
3.Plasma6	3.Plasma6	Plasma Cutting Unit
7.Plasma5	7.Plasma5	Plasma Cutting Unit
7.Plasma6	7.Plasma6	Plasma Cutting Unit
1.TORCH	1.TORCH	Torch Cutting Units
2.TORCH	2.TORCH	Torch Cutting Units
3.TORCH	3.TORCH	Torch Cutting Units
4.TORCH	4.TORCH	Torch Cutting Units
5.TORCH	5.TORCH	Torch Cutting Units
6.TORCH	6.TORCH	Torch Cutting Units
7.TORCH	7.TORCH	Torch Cutting Units
P.TORCH	P.TORCH	Torch Cutting Units

B. Metal Welding and Fabricating Equipment

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description
1.WELDING	1.WELDING	Conventional Welding Units
1.WELDPLS	1.WELDPLS	Pulse Current Welding Units
2.WELDING	2.WELDING	Conventional Welding Units
2.WELDPLS	2.WELDPLS	Pulse Current Welding Units
3.WELDING	3.WELDING	Conventional Welding Units
3.WELDPLS	3.WELDPLS	Pulse Current Welding Units
4.WELDING	4.WELDING	Conventional Welding Units
4.WELDPLS	4.WELDPLS	Pulse Current Welding Units
5.WELDING	5.WELDING	Conventional Welding Units
5.WELDPLS	5.WELDPLS	Pulse Current Welding Units
6.WELDING	6.WELDING	Conventional Welding Units
6.WELDPLS	6.WELDPLS	Pulse Current Welding Units
7.WELDING	7.WELDING	Conventional Welding Units
7.WELDPLS	7.WELDPLS	Pulse Current Welding Units
P.WELDING	P.WELDING	Conventional Welding Units
P.WELDPLS	P.WELDPLS	Pulse Current Welding Units
1.METAL	1.METAL	Plant 1 Metal Drilling, Machining, and Grinding
2.METAL	2.METAL	Plant 2 Metal Drilling, Machining, and Grinding
3.METAL	3.METAL	Plant 3 Metal Drilling, Machining, and Grinding
4.METAL	4.METAL	Plant 4 Metal Drilling, Machining, and Grinding
5.METAL	5.METAL	Plant 5 Metal Drilling, Machining, and Grinding
6.METAL	6.METAL	Plant 6 Metal Drilling, Machining, and Grinding

C. Parts Washers

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description
7.R	7.R	Parts Washers
P.O	P.O	Parts Washers
1.PRTWSH	1.PRTWSH	Parts Washers
2.PRTWSH	2.PRTWSH	Parts Washers
3.PRTWSH	3.PRTWSH	Parts Washers
4.PRTWSH	4.PRTWSH	Parts Washers
5.PRTWSH	5.PRTWSH	Parts Washers
6.PRTWSH	6.PRTWSH	Parts Washers
7.PRTWSH	7.PRTWSH	Parts Washers
P.PRTWSH	P.PRTWSH	Parts Washers
W.M	W.M	Parts Washers

D. Plant 4 Multi-Stage Washer System

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description
4.DD	4.DD	Stage 1 Washer
4.EE	4.EE	Stage 3 Burner
4.FF	4.FF	Stage 1 Burner
4.GG	4.GG	Stage 5 Washer

E. Plant 5 Multi-Stage Washer System and Powder Paint Booth

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description
5.KK3	5.KK3	Stage 1 Washer
5.KK4	5.KK4	Multi-stage Washer
5.KK5	5.KK5	Stage 1 Burner
5.KK6	5.KK6	Stage 3 Burner
5.KK7	5.KK7	Dry-off Oven
5.KK8	5.KK8	Cure Oven

F. Plant 6 Multi-Stage Washer System

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description
6.QQ	6.QQ	Stage 1 Washer
6.RR	6.RR	Stage 1 Burner
6.SS	6.SS	Stage 3 Burner
6.TT	6.TT	Stage 5 Burner
6.UU	6.UU	Stage 5 Washer

G. Paint Booths

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description
1.AG1	1.AG	Paint Booth
1.AG2	1.AG	Paint Booth
1.K	1.K	Paint Booth
5.G1	5.G	Paint Booth
5.G2	5.G	Paint Booth
5.J	5.J	Paint Booth
6.HH	6.HH	Paint Booth
6.M1	6.M	Paint Booth
6.M2	6.M	Paint Booth
2.AI1	2.AI	Paint Booth
2.AI2	2.AI	Paint Booth
2.F1	2.F	Paint Booth
2.F2	2.F	Paint Booth
2.H	2.H	Paint Booth
3.F1	3.F	Paint Booth
3.F2	3.F	Paint Booth
3.HH	3.HH	Paint Booth
3.II	3.II	Paint Booth
4.F	4.F	Paint Booth
4.G1	4.G	Paint Booth
4.G2	4.G	Paint Booth
6.N	6.N	Paint Booth
6.S	6.S	Paint Booth

H. Paint Ovens

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description
1.J	1.J	Paint Oven
2.I	2.I	Paint Oven
3.B	3.B	Paint Oven
3.JJ	3.JJ	Paint Oven
3.MM	3.MM	Paint Oven
4.E	4.E	Paint Oven
5.I	5.I	Paint Oven
6.F	6.F	Paint Oven

I. Paint Kitchens

Emission Point Number	Associated Emission Unit Number(s)	Associated Emission Unit Description
1.AP	1.AP	Paint Kitchen
1.AQ	1.AQ1	Paint Kitchen
	1.AQ2	
2.AF	2.AF1	Paint Kitchen
	2.AF2	
2.AG	2.AG	Paint Kitchen
3.GH	3.GH	Paint Kitchen
3.GI	3.GI	Paint Kitchen
3.KK	3.KK	Paint Kitchen
4.CD	4.CD	Paint Kitchen
4.CE	4.CE1	Paint Kitchen
	4.CE2	
5.BB	5.BB1	Paint Kitchen
	5.BB2	
5.DD	5.DD	Paint Kitchen
6.FF	6.FF	Paint Kitchen
6.GG	6.GG	Paint Kitchen
6.VV	6.VV	Paint Kitchen
6.WW	6.WW	Paint Kitchen

J. Production Engine Testing Units

Emission Point Number	Associated Emission Unit Number	Construction Permit #
1.AH	1.AH	Production Engine Testing Unit
2.AB	2.AB	Production Engine Testing Unit
2.G	2.G	Production Engine Testing Unit
2.J	2.J	Production Engine Testing Unit
4.J	4.J	Production Engine Testing Unit
5.N	5.N	Production Engine Testing Unit
5.T	5.T	Production Engine Testing Unit
5.W	5.W	Production Engine Testing Unit
1.AU	1.AU	Production Engine Testing Unit
3.A1	3.A1	Production Engine Testing Unit
3.A2	3.A2	Production Engine Testing Unit
3.D1	3.D1	Production Engine Testing Unit
3.D2	3.D2	Production Engine Testing Unit
3.D3	3.D3	Production Engine Testing Unit
3.S	3.S	Production Engine Testing Unit
3.Z	3.Z	Production Engine Testing Unit
4.I	4.I	Production Engine Testing Unit
4.JJ	4.JJ	Production Engine Testing Unit
4.S	4.S	Production Engine Testing Unit
6.D	6.D	Production Engine Testing Unit
6.K	6.K	Production Engine Testing Unit
6.LL	6.LL	Production Engine Testing Unit
6.MM	6.MM	Production Engine Testing Unit
7.G	7.G	Production Engine Testing Unit
7.H	7.H	Production Engine Testing Unit
7.I	7.I	Production Engine Testing Unit
8.B	8.B	Production Engine Testing Unit
HB.A	HB.A	Production Engine Testing Unit
HB.B	HB.B	Production Engine Testing Unit

K. Heating Units

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description
1.AA	1.AA	Non-Production Heating Unit
1.AC	1.AC	Non-Production Heating Unit
1.AD	1.AD	Non-Production Heating Unit
1.AF	1.AF	Non-Production Heating Unit
1.AV	1.AV	Non-Production Heating Unit
1.AW	1.AW	Non-Production Heating Unit
1.AX	1.AX	Non-Production Heating Unit
1.AY	1.AY	Non-Production Heating Unit
1.AZ	1.AZ	Non-Production Heating Unit
1.BA	1.BA	Non-Production Heating Unit
1.BC	1.BC	Non-Production Heating Unit
1.BD	1.BD	Non-Production Heating Unit
1.C	1.C	Non-Production Heating Unit
1.D	1.D	Water Heater
1.EE	1.EE	Phos Pro Water Heater
1.FF	1.FF	Non-Production Heating Unit
1.GG	1.GG	Non-Production Heating Unit
1.O	1.O	Non-Production Heating Unit
1.U	1.U	Water Heater
1.Y	1.Y	Non-Production Heating Unit
2.AD1	2.AD1	Make Up Air Unit
2.AD2	2.AD2	Make Up Air Unit
2.AE	2.AE	Make Up Air Unit
2.AH	2.AH	Phos Pro Water Heater
2.AJ	2.AJ	Paint Boot Air Intake
2.B	2.B	Non-Production Heating Unit
2.P	2.P	Non-Production Heating Unit
2.Q	2.Q	Water Heater
2.V1	2.V1	Non-Production Heating Unit
2.V2	2.V2	Non-Production Heating Unit
2.X	2.X	Non-Production Heating Unit
2.Y1	2.Y1	Non-Production Heating Unit
2.Y2	2.Y2	Non-Production Heating Unit
3.AA	3.AA	Parts Oven
3.AD	3.AD	Phos Pro Water Heater
3.AF	3.AF	Non-Production Heating Unit
3.AG	3.AG	Non-Production Heating Unit
3.BB	3.BB	Non-Production Heating Unit
3.C	3.C	Non-Production Heating Unit
3.GG	3.GG	Non-Production Heating Unit

K. Heating Units (continued)

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description
3.GK1	3.GK1	Non-Production Heating Unit
3.GK2	3.GK2	Non-Production Heating Unit
3.LL	3.LL	Make Up Air Unit
3.M	3.M	Water Heater
3.P	3.P	Non-Production Heating Unit
3.PP	3.PP	Make Up Air Unit
3.RR	3.RR	Make Up Air Unit
3.SS	3.SS	Make Up Air Unit
3.T	3.T	Non-Production Heating Unit
3.TT	3.TT	Make Up Air Unit
3.UU	3.UU	Make Up Air Unit
3.VV	3.VV	Make Up Air Unit
3.W	3.W	Non-Production Heating Unit
3.WW	3.WW	Make Up Air Unit
3.X1	3.X1	Non-Production Heating Unit
3.X2	3.X2	Non-Production Heating Unit
3.Y1	3.Y1	Non-Production Heating Unit
4.A1	4.A1	Non-Production Heating Unit
4.A2	4.A2	Non-Production Heating Unit
4.A3	4.A3	Non-Production Heating Unit
4.AA	4.AA	Non-Production Heating Unit
4.AC	4.AC	Non-Production Heating Unit
4.AD	4.AD	Non-Production Heating Unit
4.AE	4.AE	Non-Production Heating Unit
4.AF	4.AF	Non-Production Heating Unit
4.BB	4.BB	Non-Production Heating Unit
4.D	4.D	Water Heater
4.H2	4.H2	Non-Production Heating Unit
4.K1	4.K1	Non-Production Heating Unit
4.KK	4.KK	Wash Bay Heater
4.L	4.L	Non-Production Heating Unit
4.R	4.R	Non-Production Heating Unit
4.T	4.T	Non-Production Heating Unit
5.A	5.A	Non-Production Heating Unit
5.AA	5.AA	Non-Production Heating Unit
5.AJ1	5.AJ1	Make Up Air Unit
5.AJ2	5.AJ2	Make Up Air Unit
5.AJ3	5.AJ3	Make Up Air Unit
5.AJ4	5.AJ4	Make Up Air Unit
5.AJ5	5.AJ5	Make Up Air Unit

K. Heating Units (continued)

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description
5.AJ6	5.AJ6	Make Up Air Unit
5.AJ7	5.AJ7	Make Up Air Unit
5.AJ8	5.AJ8	Make Up Air Unit
5.B1	5.B1	Non-Production Heating Unit
5.B2	5.B2	Non-Production Heating Unit
5.E	5.E	Water Heater
5.EE	5.EE	Non-Production Heating Unit
5.FF	5.FF	Non-Production Heating Unit
5.GG	5.GG	Non-Production Heating Unit
5.H	5.H	Non-Production Heating Unit
5.HH	5.HH	Non-Production Heating Unit
5.II	5.II	Non-Production Heating Unit
5.JJ	5.JJ	Non-Production Heating Unit
5.K	5.K	Non-Production Heating Unit
5.M	5.M	Non-Production Heating Unit
5.O	5.O	Non-Production Heating Unit
5.P	5.P	Make Up Air Unit
5.R	5.R	Water Heater
6.AA1	6.AA1	Non-Production Heating Unit
6.AA2	6.AA2	Non-Production Heating Unit
6.AA3	6.AA3	Non-Production Heating Unit
6.AA4	6.AA4	Non-Production Heating Unit
6.AB	6.AB	Non-Production Heating Unit
6.AC	6.AC	Non-Production Heating Unit
6.AD	6.AD	Non-Production Heating Unit
6.AE	6.AE	Non-Production Heating Unit
6.AF	6.AF	Non-Production Heating Unit
6.AG	6.AG	Non-Production Heating Unit
6.C	6.C	Non-Production Heating Unit
6.JJ	6.JJ	Paint Boot Air Intake
6.KK	6.KK	Paint Boot Air Intake
6.L	6.L	Non-Production Heating Unit
6.Q	6.Q	Water Heater
6.R	6.R	Non-Production Heating Unit
6.T	6.T	Non-Production Heating Unit
7.B1	7.B1	Non-Production Heating Unit
7.B2	7.B2	Non-Production Heating Unit
7.B3	7.B3	Non-Production Heating Unit
7.B4	7.B4	Non-Production Heating Unit
7.D	7.D	Non-Production Heating Unit

K. Heating Units (continued)

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description
7.K	7.K	Non-Production Heating Unit
7.L	7.L	Non-Production Heating Unit
7.M	7.M	Non-Production Heating Unit
7.N	7.N	Non-Production Heating Unit
7.O	7.O	Non-Production Heating Unit
7.P	7.P	Non-Production Heating Unit
7.Q	7.Q	Non-Production Heating Unit
7.S	7.S	Non-Production Heating Unit
7.T	7.T	Non-Production Heating Unit
7.T1	7.T1	Non-Production Heating Unit
7.U	7.U	Non-Production Heating Unit
7.V	7.V	Non-Production Heating Unit
7.W	7.W	Non-Production Heating Unit
7.X	7.X	Non-Production Heating Unit
8.A1	8.A1	Non-Production Heating Unit
8.A2	8.A2	Non-Production Heating Unit
8.A3	8.A3	Non-Production Heating Unit
8.A4	8.A4	Non-Production Heating Unit
8.A5	8.A5	Non-Production Heating Unit
8.A6	8.A6	Non-Production Heating Unit
8.A7	8.A7	Non-Production Heating Unit
8.A8	8.A8	Non-Production Heating Unit
8.A9	8.A9	Non-Production Heating Unit
8.A10	8.A10	Non-Production Heating Unit
8.A11	8.A11	Non-Production Heating Unit
8.A12	8.A12	Non-Production Heating Unit
HB.J	HB.J	Non-Production Heating Unit
HB.N	HB.N	Non-Production Heating Unit
P.C1	P.C1	Non-Production Heating Unit
P.C2	P.C2	Non-Production Heating Unit
P.D1	P.D1	Non-Production Heating Unit
P.D2	P.D2	Non-Production Heating Unit
P.D3	P.D3	Non-Production Heating Unit
P.E	P.E	Non-Production Heating Unit
PB.A	PB.A	Non-Production Heating Unit
W.B	W.B	Hotsey Washer
P.A1	P.A1	Non-Production Heating Unit
P.A2	P.A2	Non-Production Heating Unit
Q.A	Q.A	Non-Production Heating Unit
WW.A	WW.A	Non-Production Heating Unit

L. Storage Tanks

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description
DSL TANK2	DSL TANK2	Storage Tank
DSL TANK4	DSL TANK4	Storage Tank
DSL TANK8	DSL TANK8	Storage Tank
DSL TANK9	DSL TANK9	Storage Tank
GAS TANK3	GAS TANK3	Storage Tank
GAS TANK7	GAS TANK7	Storage Tank
OIL TANK	OIL TANK	Storage Tank
PROPANE	PROPANE	Three (3) Storage Tanks
PROPYLENE	PROPYLENE	Three (3) Storage Tanks

M. Miscellaneous Equipment

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description
1.T	1.T	Steel Shot Metal Blast Booth
W.E	W.E	Hook Burn-Off Oven
W.F1	W.F1	Waste Solvent Still
W.F2	W.F2	Waste Solvent Still
W.H	W.H	Aerosol Can Crusher
W.I	W.I	Hook Burn-Off Oven
F.SAND	F.SAND	Sand Blasting Unit (Fugitive)
F.SODA	F.SODA	Soda Blasting Unit (Fugitive)

II. Facility-Wide Conditions

Facility Name: Vermeer Manufacturing Co.
Permit Number: 99-TV-052-M001

Permit conditions are established in accord with 567 Iowa Administrative Code rule 22.108

Permit Duration

The term of this permit is: 5 years
Commencing on: October 19, 1999
Ending on: October 18, 2004

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

Emission Limits

The atmospheric emissions from the facility and the specified units shall not exceed the following:

Pollutant: Nitrogen Oxides (NO_x) Facility-wide limit
Emission Rate (tons/yr.): 249
Authority for Requirement: Iowa DNR Construction Permit 97-A-298-S3, (see Emission Point-Specific Conditions for other construction permit citations)

Pollutant: Volatile Organic Compound (VOC) Facility-wide limit
Emission Rate (tons/yr.): 249
Authority for Requirement: Iowa DNR Construction Permit 96-A-1216-S4, (see Emission Point-Specific Conditions for other construction permit citations)

Pollutant: Hazardous Air Pollutants (HAP)
Emission Rate (tons/yr.): Emissions shall remain below 10 tons per year of any HAP, and below 25 tons per year of any combination of HAPs.
Authority for Requirement: This limit was requested by the applicant.
567 IAC 22.108(14)

The facility requested this limit, with the intent that the facility will remain an area source with regard to 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants.

Reporting & Recordkeeping

Painting Operations

All records, as required in the following, shall be satisfactory for demonstrating compliance with all applicable emission limits.

Records shall be kept on-site for five years and shall be available for inspection by the Department. Records shall be maintained in a legible and orderly manner and shall indicate the following:

- A. The amount of each paint and solvent used in all painting operations, other than architectural, in gallons. Calculate and record monthly and 12-month rolling totals for each paint and solvent.
- B. The VOC content of any paint and solvent used in all painting operations, other than architectural, in pounds per gallon.
- C. The amount of paint and solvent waste sent off-site for disposal from all painting operations, other than architectural, in gallons. Calculate and record monthly and 12-month rolling totals for each waste stream.
- D. The VOC content of any paint and solvent waste from production operations, other than architectural, sent off site for disposal, in pounds per gallon.
- E. The amount of solvent recycled for re-use in all painting operations, other than architectural, in gallons.
- F. The VOC content of any solvent recycled for reuse in all painting operations, other than architectural, in pounds per gallon.
- G. Calculate and record monthly and 12-month rolling totals of VOC emissions from all painting operations, other than architectural, at this source, in tons.
- H. Calculate and record monthly and 12-month rolling totals of VOC emissions from all emission units at this source, in tons.

Authority for Requirement: Iowa DNR Construction Permit 97-A-972-S3, (see Emission Point-Specific Conditions for other construction permit citations)

Hazardous Air Pollutants (HAP)

All records, as required in the following, shall be satisfactory for demonstrating compliance with all applicable emission limits.

Records shall be kept on-site for five years and shall be available for inspection by the Department. Records shall be maintained in a legible and orderly manner and shall indicate the following:

- A. The content of each HAP contained in any paint and solvent used in all painting operations, other than architectural, in pounds per gallon.
- B. The content of each HAP contained in any paint and solvent waste from production operations, other than architectural, sent off site for disposal, in pounds per gallon.
- C. The content of each HAP contained in any solvent recycled for reuse in all painting operations, other than architectural, in pounds per gallon.
- D. Calculate and record monthly and 12-month rolling totals of individual and total HAP emissions from all painting operations, other than architectural, at this source, in tons.
- E. Calculate and record monthly and 12-month rolling totals of individual and total HAP emissions from all emission units at this source, in tons.

Authority for Requirement: 567 IAC 22.108(3)

Liquid Fuels

- A. The amount of diesel fuel used in all production test units, in gallons. Calculate and record monthly and 12-month rolling totals.
- B. The amount of gasoline used in all production test units, in gallons. Calculate and record monthly and 12-month rolling totals.
- C. The sulfur content of any diesel fuel used in all production test units, in weight percent.
- D. The amount of VOC emitted by the production test units, in tons. Calculate and record monthly and 12-month rolling totals. Emissions must be based on total gallons used and AP-42 factors for engines less than 600 hp.
- E. The amount of NOx emitted by the production test units, in tons. Calculate and record monthly and 12-month rolling totals. Emissions must be based on total gallons used and AP-42 factors for engines less than 600 hp.
- F. Calculate and record monthly and 12-month rolling totals of NOx emissions from all production test units at this source, in tons.
- G. Calculate and record monthly and 12-month rolling totals of VOC emissions from all production test units at this source, in tons.
- H. Calculate and record monthly and 12-month rolling totals of NOx emissions from all emission units at this source, in tons.
- I. Calculate and record monthly and 12-month rolling totals of VOC emissions from all emission units at this source, in tons.

Authority for Requirement: Iowa DNR Construction Permit 97-A-299-S3, (see Emission Point-Specific Conditions for other construction permit citations)
567 IAC 22.108(3)

Gaseous Fuels

- A. The amount of natural gas used in all units, in cubic feet. Calculate and record monthly and 12-month rolling totals.
- B. The amount of propane used in all units, in gallons. Calculate and record monthly and 12-month rolling totals.
- C. The amount VOC emitted by all natural gas and propane fired units, in tons. Calculate and record monthly and 12-month rolling totals.
- D. The amount NOx emitted by all natural gas and propane fired units, in tons. Calculate and record monthly and 12-month rolling totals.

Authority for Requirement: Iowa DNR Construction Permit 98-A-094-S1, (see Emission Point-Specific Conditions for other construction permit citations)

Facility-Wide Operational Limits

Unless specified otherwise in the Emission Point-Specific Conditions, the following limitations and supporting regulations apply to all emission points at this facility:

Process Throughput:

The sulfur content of any number one or number two diesel fuel combusted at this facility shall not exceed 0.5% by weight.

Authority for Requirement: 567 IAC 23.3(3)"b"

Process Throughput:

The sulfur content of natural gas or LPG combusted in indirectly fired emission units at this facility shall not exceed 123 ppm by weight.

Reporting & Record keeping:

All records, as required in the following, shall demonstrate compliance with all applicable limits on LPG. Records shall be made available for inspection upon request by representatives of the Iowa DNR. The records, as a minimum, shall consist of the following:

- A. The amount of LPG purchased by this facility, in gallons. Calculate and record monthly and twelve (12) month rolling totals.
- B. The owner/operator shall obtain two reports per year from the LPG supplier, one in July and one in December, to verify the sulfur content of the LPG.

Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Opacity (visible emissions): 40% opacity
Authority for Requirement: 567 IAC 23.3(2)"d"

Sulfur Dioxide (SO₂): 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Particulate Matter: No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 IAC Chapter 24. For sources constructed, modified or reconstructed after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas, except as provided in 567 IAC 21.2(455B), 23.1(455B), 23.4(455B) and 567 IAC Chapter 24.

For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B).
Authority for Requirement: 567 IAC 23.3(2)"a"

Fugitive Dust: Attainment and Unclassified Areas - No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved public roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance, as defined in Iowa Code section 657.1, from becoming airborne. All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions that require abatement pursuant to this subrule. Reasonable precautions may include, but not limited to, the following procedures.

1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizers or limestone.
4. Covering at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.

Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan

The owner/operator shall comply with the applicable requirements listed below. The compliance status is based on information provided by the applicant.

Unless otherwise noted in Section III of this permit, Vermeer Manufacturing Co. is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which become effective during the permit term, Vermeer Manufacturing Co. shall comply with such requirements in a timely manner.

Authority for Requirement: 567 IAC 22.108(15)

III. Emission Point-Specific Conditions

Facility Name: Vermeer Manufacturing Co.
Permit Number: 99-TV-052-M001

Emission Point ID Number: 4.Laser

Associated Equipment

Associated Emission Unit ID Numbers: 4.Laser
Emissions Control Equipment ID Numbers:..... 4.Laser
Emissions Control Equipment Description:..... Baghouse

Applicable Requirements

Emission Units vented through this Emission Point: 4.Laser
Emission Units Description: Single Head Laser Cutter
Raw Material/Fuel:..... Sheet Steel
Rated Capacity: 8,268 inches steel/cutting head/hour

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Fugitive Dust

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

Pollutant: Hazardous Air Pollutants (HAP)

Emission Limit: See Facility-Wide Conditions

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.LASER

Associated Equipment

Associated Emission Unit ID Number: 7.LASER
Emissions Control Equipment ID Number: 7.LASER
Emissions Control Equipment Description: Baghouse

Applicable Requirements

Emission Unit vented through this Emission Point: 7.LASER
Emission Unit Description: Four (4) Single Head Laser Cutters
Raw Material/Fuel: Sheet Steel
Rated Capacity: 4,800 inches steel/cutting head/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Indicator Opacity: 25%⁽¹⁾

⁽¹⁾ If visible emissions are observed that exceed the indicator opacity other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: 567 IAC 23.3(2)"d"
Iowa DNR Construction Permit 98-A-456-S1

Pollutant: Particulate Matter
Emission Limit: 0.1 gr/scf
Authority for Requirement: 567 IAC 23.3(2)"a"
Iowa DNR Construction Permit 98-A-456-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-456-S1

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Operating Limits:

This source is comprised of four lasercutting tables.

Authority for Requirement: Iowa DNR Construction Permit 98-A-456-S1

Emission Point Characteristics

This emission point shall conform to the following conditions.

Stack Height (feet): 25

Stack Diameter (inches): 18

Stack Exhaust Flow Rate (scfm): 4,800

Stack Temperature (°F): Ambient

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-456-S1

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table FLAME-NC

Applicable Requirements

(The following requirements apply to the emission units identified in Table FLAME-NC)

Emission Units vented through this Emission Point: See Table FLAME-NC

Emission Units Description: Oxyacetylene Flame Cutting Units

Raw Material/Fuel: Sheet Steel

Rated Capacity: 660 inches steel/cutting head/hour

Table FLAME-NC

(Flame cutting units with no control device)

Emission Point Number	Associated Emission Unit Number	Control Equipment ID Number	Number of Cutting Heads	Building Number
2.Flame1	2.Flame1	None	1	2
2.Flame2	2.Flame2	None	1	2
3.Flame4	3.Flame4	None	1	3
3.Flame5	3.Flame5	None	1	3
4.Flame2	4.Flame2	None	1	4
4.Flame3	4.Flame3	None	1	4
5.Flame1	5.Flame1	None	1	5
7.Flame2	7.Flame2	None	2	7
7.Flame3	7.Flame3	None	1	7
7.Flame4	7.Flame4	None	1	7
7.Flame5	7.Flame5	None	1	7
7.Flame6	7.Flame6	None	1	7

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point identified in Table FLAME-NC shall not exceed the following specified levels.

Pollutant: Fugitive Dust

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance.

All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

Pollutant: Hazardous Air Pollutants (HAP)

Emission Limit: See Facility-Wide Conditions

Periodic Monitoring Requirements

The owner/operator of each piece of equipment identified in Table FLAME-NC shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table FLAME-WT

Applicable Requirements

(The following requirements apply to the emission units identified in Table FLAME-WT)

Emission Units vented through this Emission Point: See Table FLAME-WT

Emission Units Description: Oxyacetylene Flame Cutting Units

Raw Material/Fuel: Sheet Steel

Rated Capacity: 660 inches steel/cutting head/hour

Table FLAME-WT

(Flame cutting units controlled by a water table)

Emission Point Number	Associated Emission Unit Number	Control Equipment ID Number	Control Equipment Description	Number of Cutting Heads	Building Number
1.Flame1	1.Flame1	1.Flame1	Water Table	1	1
1.Flame2	1.Flame2	1.Flame2	Water Table	1	1
3.Flame1	3.Flame1	3.Flame1	Water Table	1	3
3.Flame2	3.Flame2	3.Flame2	Water Table	8	3
3.Flame3	3.Flame3	3.Flame3	Water Table	8	3
4.Flame1	4.Flame1	4.Flame1	Water Table	2	4
7.Flame1	7.Flame1	7.Flame1	Water Table	1	7

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point identified in Table FLAME-WT shall not exceed the following specified levels.

Pollutant: Fugitive Dust

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance.

All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

Pollutant: Hazardous Air Pollutants (HAP)

Emission Limit: See Facility-Wide Conditions

Periodic Monitoring Requirements

The owner/operator of each piece of equipment identified in Table FLAME-WT shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table PLASMA-NC

Applicable Requirements

(The following requirements apply to the emission units identified in Table PLASMA-NC)

Emission Units vented through this Emission Point: See Table PLASMA-NC

Emission Units Description: Plasma Cutting Units

Raw Material/Fuel: Sheet Steel

Rated Capacity: 4,500 inches steel/cutting head/hour

Table PLASMA-NC

(Plasma cutting units with no control device)

Emission Point Number	Associated Emission Unit Number	Control Equipment ID Number	Number of Cutting Heads	Building Number
1.Plasma1	1.Plasma1	None	1	1
2.Plasma1	2.Plasma1	None	1	2
2.Plasma2	2.Plasma2	None	1	2
3.Plasma1	3.Plasma1	None	1	3
3.Plasma2	3.Plasma2	None	1	3
3.Plasma3	3.Plasma3	None	1	3
4.Plasma1	4.Plasma1	None	1	4
4.Plasma2	4.Plasma2	None	1	4
4.Plasma3	4.Plasma3	None	1	4
5.Plasma1	5.Plasma1	None	1	5
5.Plasma2	5.Plasma2	None	1	5
6.Plasma1	6.Plasma1	None	1	6
7.Plasma1	7.Plasma1	None	1	7
7.Plasma2	7.Plasma2	None	1	7
7.Plasma3	7.Plasma3	None	1	7

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point identified in Table PLASMA-NC shall not exceed the following specified levels.

Pollutant: Fugitive Dust

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Periodic Monitoring Requirements

The owner/operator of each piece of equipment identified in Table PLASMA-NC shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table PLASMA-BH

Applicable Requirements

(The following requirements apply to the emission units identified in Table PLASMA-BH)

Emission Units vented through this Emission Point: See Table PLASMA-BH

Emission Units Description: Whitney Plasma Cutting Units

Raw Material/Fuel: Sheet Steel

Rated Capacity: 12,000 inches steel/cutting head/hour

Table PLASMA-BH

(Plasma cutting units controlled by a baghouse)

Emission Point Number	Associated Emission Unit Number	Control Equipment ID Number	Control Equipment Description	Number of Cutting Heads	Building Number
2.Plasma3	2.Plasma3	2.Plasma3	Baghouse	1	2
2.Plasma4	2.Plasma4	2.Plasma4	Baghouse	1	2
2.Plasma5	2.Plasma5	2.Plasma5	Baghouse	1	2
3.Plasma4	3.Plasma4	3.Plasma4	Baghouse	1	3
3.Plasma5	3.Plasma5	3.Plasma5	Baghouse	1	3
4.Plasma4	4.Plasma4	4.Plasma4	Baghouse	1	4
4.Plasma5	4.Plasma5	4.Plasma5	Baghouse	1	4
5.Plasma3	5.Plasma3	5.Plasma3	Baghouse	1	5
5.Plasma4	5.Plasma4	5.Plasma4	Baghouse	1	5
7.Plasma4	7.Plasma4	7.Plasma4	Baghouse	1	7

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point identified in Table PLASMA-BH shall not exceed the following specified levels.

Pollutant: Fugitive Dust

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance.

All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

Pollutant: Hazardous Air Pollutants (HAP)

Emission Limit: See Facility-Wide Conditions

Periodic Monitoring Requirements

The owner/operator of each piece of equipment identified in Table PLASMA-BH shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table PLASMA-WT

Applicable Requirements

(The following requirements apply to the emission units identified in Table PLASMA-WT)

Emission Units vented through this Emission Point: See Table PLASMA-WT

Emission Units Description: Whitney Plasma Cutting Units

Raw Material/Fuel: Sheet Steel

Rated Capacity: 12,000 inches steel/cutting head/hour

Table PLASMA-WT

(Plasma cutting units controlled by a water table)

Emission Point Number	Associated Emission Unit Number	Control Equipment ID Number	Control Equipment Description	Number of Cutting Heads	Building Number
3.Plasma6	3.Plasma6	3.Plasma6	Water Table	1	3
7.Plasma5	7.Plasma5	7.Plasma5	Water Table	1	7
7.Plasma6	7.Plasma6	7.Plasma6	Water Table	1	7

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point identified in Table PLASMA-WT shall not exceed the following specified levels.

Pollutant: Fugitive Dust

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance.

All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

Pollutant: Hazardous Air Pollutants (HAP)

Emission Limit: See Facility-Wide Conditions

Periodic Monitoring Requirements

The owner/operator of each piece of equipment identified in Table PLASMA-WT shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table TORCH

Applicable Requirements

(The following requirements apply to the emission units identified in Table TORCH)

Emission Units vented through this Emission Point: See Table TORCH

Emission Units Description: Single Cutting Head Oxyacetylene Torch Cutting Units

Raw Material/Fuel: Sheet Steel

Rated Capacity: 840 inches of steel cut/hr

Table TORCH

(Torch cutting units)

Emission Point Number	Associated Emission Unit Number	Number of Cutters	Building Number
1.TORCH	1.TORCH	9	1
2.TORCH	2.TORCH	9	2
3.TORCH	3.TORCH	17	3
4.TORCH	4.TORCH	13	4
5.TORCH	5.TORCH	7	5
6.TORCH	6.TORCH	10	6
7.TORCH	7.TORCH	10	7
P.TORCH	P.TORCH	2	Parts

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point identified in Table TORCH shall not exceed the following specified levels.

Pollutant: Fugitive Dust

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance.

All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

Pollutant: Hazardous Air Pollutants (HAP)

Emission Limit: See Facility-Wide Conditions

Periodic Monitoring Requirements

The owner/operator of each piece of equipment identified in Table TORCH shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table WELD

Applicable Requirements

(The following requirements apply to the emission units identified in Table WELD)

Emission Units vented through this Emission Point: See Table WELD

Emission Units Description: GMAW Welding Units

Raw Material/Fuel: E70S weld wire

Rated Capacity: 19 lb of wire/hr per unit

Table WELD
(GMAW welding units)

Emission Point Number	Associated Emission Unit Number	Type of Welder	Number of Welders	Building Number
1.WELDING	1.WELDING	Conventional	49	1
1.WELDPLS	1.WELDPLS	Pulse Current	38	1
2.WELDING	2.WELDING	Conventional	45	2
2.WELDPLS	2.WELDPLS	Pulse Current	24	2
3.WELDING	3.WELDING	Conventional	60	3
3.WELDPLS	3.WELDPLS	Pulse Current	33	3
4.WELDING	4.WELDING	Conventional	61	4
4.WELDPLS	4.WELDPLS	Pulse Current	47	4
5.WELDING	5.WELDING	Conventional	42	5
5.WELDPLS	5.WELDPLS	Pulse Current	49	5
6.WELDING	6.WELDING	Conventional	43	6
6.WELDPLS	6.WELDPLS	Pulse Current	32	6
7.WELDING	7.WELDING	Conventional	35	7
7.WELDPLS	7.WELDPLS	Pulse Current	54	7
P.WELDING	P.WELDING	Conventional	3	Parts
P.WELDPLS	P.WELDPLS	Pulse Current	1	Parts

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point identified in Table WELD shall not exceed the following specified levels.

Pollutant: Fugitive Dust

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Periodic Monitoring Requirements

The owner/operator of each piece of equipment identified in Table WELD shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table METAL

Applicable Requirements

(The following requirements apply to the emission units identified in Table METAL)

Table METAL
(Metal fabricating units)

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description	Raw Material	Rated Capacity
1.METAL	1.METAL	Metal Drilling, Machining, and Grinding	Sheet Steel	Variable
2.METAL	2.METAL	Metal Drilling, Machining, and Grinding	Sheet Steel	Variable
3.METAL	3.METAL	Metal Drilling, Machining, and Grinding	Sheet Steel	Variable
4.METAL	4.METAL	Metal Drilling, Machining, and Grinding	Sheet Steel	Variable
5.METAL	5.METAL	Metal Drilling, Machining, and Grinding	Sheet Steel	Variable
6.METAL	6.METAL	Metal Drilling, Machining, and Grinding	Sheet Steel	Variable

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point identified in Table METAL shall not exceed the following specified levels.

Pollutant: Fugitive Dust

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance.

All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

Pollutant: Hazardous Air Pollutants (HAP)

Emission Limit: See Facility-Wide Conditions

Periodic Monitoring Requirements

The owner/operator of each piece of equipment identified in Table METAL shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 7.R

Associated Equipment

Associated Emission Unit ID Number: 7.R

Applicable Requirements

Emission Unit vented through this Emission Point: 7.R
Emission Unit Description: One (1) Safety Kleen Partwasher
Raw Material/Fuel: Stoddard Solvent
Rated Capacity: 55 Gallons Solvent

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-869-S1

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Reporting & Record keeping: See Facility-Wide Conditions and include:
A. The amount of any solvent used in this unit, in gallons. Calculate and record monthly and twelve (12) month rolling totals
B. The VOC content of any solvent used in this partwasher, in pounds per gallon.
Authority for Requirement: Iowa DNR Construction Permit 98-A-869-S1

Emission Point Characteristics

This emission point shall conform to the following conditions.

Stack Height (feet, from the ground): 25
Stack Diameter (inches): 12
Stack Exhaust Flow Rate (scfm): 1,000
Stack Temperature (°F): Ambient
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 98-A-869-S1

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: P.O

Associated Equipment

Associated Emission Unit ID Number: P.O1, P.O2

Applicable Requirements

Emission Unit vented through this Emission Point: P.O1
Emission Unit Description: One (1) Safety Kleen Parts Washer
Raw Material/Fuel: MAK Solvent
Rated Capacity: 10 Gallons Solvent

Emission Unit vented through this Emission Point: P.O2
Emission Unit Description: One (1) Safety Kleen Parts Washer
Raw Material/Fuel: MAK Solvent
Rated Capacity: 20 Gallons Solvent

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 99-A-685

Emission Point Characteristics

This emission point shall conform to the following conditions.

Stack Height (feet, from the ground): 25.3
Stack Diameter (inches): 12
Stack Exhaust Flow Rate (scfm): 1,100
Stack Temperature (°F): Ambient
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 99-A-685

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table PARTSWASH

Associated Equipment

Associated Emission Unit ID Number: See Table PARTSWASH

Applicable Requirements

(The following requirements apply to the emission units identified in Table PARTSWASH)

Emission Unit vented through this Emission Point: See Table PARTSWASH
 Emission Unit Description: Safety Kleen Parts Washers
 Raw Material/Fuel: Stoddard Solvent
 Rated Capacity: 55 gallons solvent per washer

Table PARTSWASH

Emission Point Number	Associated Emission Unit Number	Number of Parts Washers	Building Number
1.PRTWSH	1.PRTWSH	5	1
2.PRTWSH	2.PRTWSH	4	2
3.PRTWSH	3.PRTWSH	3	3
4.PRTWSH	4.PRTWSH	7	4
5.PRTWSH	5.PRTWSH	2	5
6.PRTWSH	6.PRTWSH	2	6
7.PRTWSH	7.PRTWSH	3	7
P.PRTWSH	P.PRTWSH	4	Parts
W.M	W.M	1	Waste

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point identified in Table PARTSWASH shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
 Emission Limit: See Facility-Wide Conditions

Periodic Monitoring Requirements

The owner/operator of each piece of equipment identified in Table PARTSWASH shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.DD

Associated Equipment

Associated Emission Unit ID Number: 4.DD

Applicable Requirements

Emission Unit vented through this Emission Point: 4.DD
Emission Unit Description: Stage 1 Washer
Raw Material/Fuel: Reagent
Rated Capacity: 300 gal/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Indicator Opacity: 25 %⁽¹⁾

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence of the indicator opacity of 25% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: 567 IAC 23.3(2)"d"
Iowa DNR Construction Permit 99-A-1014

Pollutant: PM₁₀
Emission Limit: 3.29 lb/hr
Authority for Requirement: Iowa DNR Construction Permit 99-A-1014

Pollutant: Particulate Matter
Emission Limit: 0.1 gr/dscf
Authority for Requirement: 567 IAC 23.3(2)"a"
Iowa DNR Construction Permit 99-A-1014

Emission Point Characteristics

This emission point shall conform to the following conditions.

Stack Height (feet, from the ground): 35
Stack Opening (inches, diameter): 36
Exhaust Flow Rate (scfm): 5,000
Exhaust Temperature (°F): 100
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 99-A-1014

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.EE

Associated Equipment

Associated Emission Unit ID Number: 4.EE

Applicable Requirements

Emission Unit vented through this Emission Point: 4.EE
Emission Unit Description: Stage 3 Burner
Raw Material/Fuel: Natural Gas
Rated Capacity: 2.5 MMBtu/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter
Emission Limit: 15.3 lb/MMCF of Propane or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter
Emission Limit: 0.8 lb/MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limit: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit: See Facility-Wide Conditions

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.FF

Associated Equipment

Associated Emission Unit ID Number: 4.FF

Applicable Requirements

Emission Unit vented through this Emission Point: 4.FF
Emission Unit Description: Stage 1 Burner
Raw Material/Fuel: Natural Gas
Rated Capacity: 3.8 MMBtu/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter
Emission Limit: 15.3 lb/MMCF of Propane or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter
Emission Limit: 0.8 lb/MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limit: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit: See Facility-Wide Conditions

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 4.GG

Associated Equipment

Associated Emission Unit ID Number: 4.GG

Applicable Requirements

Emission Unit vented through this Emission Point: 4.GG
Emission Unit Description: Stage 5 Washer
Raw Material/Fuel: Reagent
Rated Capacity: 300 gal/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter
Emission Limit: 0.1 gr/dscf
Authority for Requirement: 567 IAC 23.3(2)"a"

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.KK3

Associated Equipment

Associated Emission Unit ID Number: 5.KK3

Applicable Requirements

Emission Unit vented through this Emission Point: 5.KK3
Emission Unit Description: Stage 1 Washer
Raw Material/Fuel: Reagent
Rated Capacity: 300 gal/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Indicator Opacity: 25 %⁽¹⁾

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence of the indicator opacity of 25% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: 567 IAC 23.3(2)"d"
Iowa DNR Construction Permit 00-A-730

Pollutant: PM₁₀
Emission Limit: 1.0 lb/hr
Authority for Requirement: Iowa DNR Construction Permit 00-A-730

Pollutant: Particulate Matter
Emission Limit: 0.1 gr/dscf
Authority for Requirement: 567 IAC 23.3(2)"a"
Iowa DNR Construction Permit 00-A-730

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project (SEP):

Equipment parameters:

This SEP shall consist of a power and free conveyor system, controlled atmosphere room with air handling unit, spray booth powder reclaim unit, and batch oven with cool down tunnel and include a newly constructed room of approximately 36 feet by 32 feet in dimension for the purpose of providing a clean room type atmosphere for powder painting, installed with a power and free conveyor system which will transport small and/or medium parts from an iron phosphate multi-stage or manual wash bay cleaning system to the powder paint booth, located in the clean room using a separate air handling unit to maintain humidity, temperature and a clean environment. Vermeer will install at least one primer finish booth.

Authority for Requirement: Paragraph 3f. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term:

This SEP will be maintained for one year following commencement of the operation of the SEP, unless the DNR and Vermeer agree in writing some other period is appropriate in the circumstances.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 2001.

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Emission Point Characteristics

This emission point shall conform to the following conditions.

- Stack Height (feet, from the ground): 35
- Stack Opening (inches, diameter): 16
- Exhaust Flow Rate (scfm): 5,000
- Exhaust Temperature (°F): 100
- Vertical, Unobstructed Discharge Required: Yes No
- Authority for Requirement: Iowa DNR Construction Permit 00-A-730

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.KK4

Associated Equipment

Associated Emission Unit ID Number: 5.KK4

Applicable Requirements

Emission Unit vented through this Emission Point: 5.KK4
Emission Unit Description: Multi-Stage Washer
Raw Material/Fuel: Reagent
Rated Capacity: 300 gal/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter
Emission Limit: 0.1 gr/dscf
Authority for Requirement: 567 IAC 23.3(2)"a"

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project (SEP):

Equipment parameters:

This SEP shall consist of a power and free conveyor system, controlled atmosphere room with air handling unit, spray booth powder reclaim unit, and batch oven with cool down tunnel and include a newly constructed room of approximately 36 feet by 32 feet in dimension for the purpose of providing a clean room type atmosphere for powder painting, installed with a power and free conveyor system which will transport small and/or medium parts from an iron phosphate multi-stage or manual wash bay cleaning system to the powder paint booth, located in the clean room using a separate air handling unit to maintain humidity, temperature and a clean environment. Vermeer will install at least one primer finish booth.

Authority for Requirement: Paragraph 3f. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term:

This SEP will be maintained for one year following commencement of the operation of the SEP, unless the DNR and Vermeer agree in writing some other period is appropriate in the circumstances.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 2001.

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.KK5

Associated Equipment

Associated Emission Unit ID Number: 5.KK5

Applicable Requirements

Emission Unit vented through this Emission Point: 5.KK5
Emission Unit Description: Stage 1 Burner
Raw Material/Fuel: Natural Gas
Rated Capacity: 800,000 Btu/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter
Emission Limit: 15.3 lb/MMCF of Propane or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter
Emission Limit: 0.8 lb/MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limit: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit: See Facility-Wide Conditions

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project (SEP):

This burner is associated with the SEP described in Paragraph 3f. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542 District Court, Marion County, Law No. LACV087889

Process throughput:

The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542 District Court, Marion County, Law No. LACV087889

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.KK6

Associated Equipment

Associated Emission Unit ID Number: 5.KK6

Applicable Requirements

Emission Unit vented through this Emission Point: 5.KK6
Emission Unit Description: Stage 3 Burner
Raw Material/Fuel: Natural Gas
Rated Capacity: 400,000 Btu/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter
Emission Limit: 15.3 lb/MMCF of Propane or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter
Emission Limit: 0.8 lb/MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limit: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit: See Facility-Wide Conditions

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project (SEP):

This burner is associated with the SEP described in Paragraph 3f. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542 District Court, Marion County, Law No. LACV087889

Process throughput:

The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542 District Court, Marion County, Law No. LACV087889

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.KK7

Associated Equipment

Associated Emission Unit ID Number: 5.KK7

Applicable Requirements

Emission Unit vented through this Emission Point: 5.KK7
Emission Unit Description: Dry-off Oven
Raw Material/Fuel: Natural Gas
Rated Capacity: 2.0 MMBtu/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Indicator Opacity: 25 %⁽¹⁾

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence of the indicator opacity of 25% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: 567 IAC 23.3(2)"d"
Iowa DNR Construction Permit 00-A-731

Pollutant: Particulate Matter
Emission Limit: 0.1 gr/dscf
Authority for Requirement: 567 IAC 23.3(2)"a"
Iowa DNR Construction Permit 00-A-731

Pollutant: Sulfur Dioxide (SO₂)
Emission Limit: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limit: 2.5 lb/MMBtu
Authority for Requirement: Iowa DNR Construction Permit 00-A-731

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 00-A-731

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 00-A-731

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project (SEP):

Equipment parameters:

This SEP shall consist of a power and free conveyor system, controlled atmosphere room with air handling unit, spray booth powder reclaim unit, and batch oven with cool down tunnel and include a newly constructed room of approximately 36 feet by 32 feet in dimension for the purpose of providing a clean room type atmosphere for powder painting, installed with a power and free conveyor system which will transport small and/or medium parts from an iron phosphate multi-stage or manual wash bay cleaning system to the powder paint booth, located in the clean room using a separate air handling unit to maintain humidity, temperature and a clean environment. Vermeer will install at least one primer finish booth.

Authority for Requirement: Paragraph 3f. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term:

This SEP will be maintained for one year following commencement of the operation of the SEP, unless the DNR and Vermeer agree in writing some other period is appropriate in the circumstances.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 2001.

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Process throughput:

This oven shall be fired by natural gas or propane only.

Authority for Requirement: Iowa DNR Construction Permit 00-A-731

Emission Point Characteristics

This emission point shall conform to the following conditions.

Stack Height (feet, from the ground): 34
Stack Opening (inches, diameter): 12
Exhaust Flow Rate (scfm): 1,500
Exhaust Temperature (°F): 400
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 00-A-731

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.KK8

Associated Equipment

Associated Emission Unit ID Number: 5.KK8

Applicable Requirements

Emission Unit vented through this Emission Point: 5.KK8
Emission Unit Description: Cure Oven
Raw Material/Fuel: Natural Gas
Rated Capacity: 2.0 MMBtu/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Indicator Opacity: 25 %⁽¹⁾

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence of the indicator opacity of 25% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: 567 IAC 23.3(2)"d"
Iowa DNR Construction Permit 00-A-732

Pollutant: Particulate Matter
Emission Limit: 0.1 gr/dscf
Authority for Requirement: 567 IAC 23.3(2)"a"
Iowa DNR Construction Permit 00-A-732

Pollutant: Sulfur Dioxide (SO₂)
Emission Limit: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limit: 2.5 lb/MMBtu
Authority for Requirement: Iowa DNR Construction Permit 00-A-731

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 00-A-732

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 00-A-732

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Supplemental Environmental Project (SEP):

Equipment parameters:

This SEP shall consist of a power and free conveyor system, controlled atmosphere room with air handling unit, spray booth powder reclaim unit, and batch oven with cool down tunnel and include a newly constructed room of approximately 36 feet by 32 feet in dimension for the purpose of providing a clean room type atmosphere for powder painting, installed with a power and free conveyor system which will transport small and/or medium parts from an iron phosphate multi-stage or manual wash bay cleaning system to the powder paint booth, located in the clean room using a separate air handling unit to maintain humidity, temperature and a clean environment. Vermeer will install at least one primer finish booth.

Authority for Requirement: Paragraph 3f. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term:

This SEP will be maintained for one year following commencement of the operation of the SEP, unless the DNR and Vermeer agree in writing some other period is appropriate in the circumstances.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 2001.

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Process throughput:

This oven shall be fired by natural gas or propane only.

Authority for Requirement: Iowa DNR Construction Permit 00-A-732

Emission Point Characteristics

This emission point shall conform to the following conditions.

Stack Height (feet, from the ground): 34
Stack Opening (inches, diameter): 12
Exhaust Flow Rate (scfm): 1,500
Exhaust Temperature (°F): 400
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 00-A-732

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.QQ

Associated Equipment

Associated Emission Unit ID Number: 6.QQ

Applicable Requirements

Emission Unit vented through this Emission Point: 6.QQ
Emission Unit Description: Stage 1 Washer
Raw Material/Fuel: Hot Alkaline Cleaner
Rated Capacity: 300 gal/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Indicator Opacity:⁽¹⁾

⁽¹⁾ If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: 567 IAC 23.3(2)"d"
Iowa DNR Construction Permit 98-A-868-S1

Pollutant: Particulate Matter
Emission Limit: 0.1 gr/dscf
Authority for Requirement: 567 IAC 23.3(2)"a"
Iowa DNR Construction Permit 98-A-868-S1

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project (SEP):

Equipment parameters:

As part of a multi-stage washer system the emission unit associated with this emission point will consist of a heated alkaline cleaner solution utilizing a sequenced manifold of spray nozzle tips to clean the metal parts in preparation for polyurethane coating. An extended drain zone will be provided to prevent chemical drag out to the second stage, a clean water rinse. A power and free conveyer system will be utilized to supply parts to and from the washer system. The entire washer system shall be approximately 150 feet long, 8 to 10 feet wide, and constructed of mild and stainless steel.

Authority for Requirement: Paragraph 3d. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999.

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Emission Point Characteristics

This emission point shall conform to the following conditions.

Stack Height (feet, from the ground): 36
Stack Diameter (inches): 12.0
Stack Exhaust Flow Rate (scfm): 6,000
Stack Temperature (°F): Ambient
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 98-A-868-S1

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.RR

Associated Equipment

Associated Emission Unit ID Number: 6.RR

Applicable Requirements

Emission Unit vented through this Emission Point: 6.RR
Emission Unit Description: Stage 1 Burner
Raw Material/Fuel: Natural Gas
Rated Capacity: 3.8 MMBtu/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter
Emission Limit: 15.3 lb/MMCF of Propane or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter
Emission Limit: 0.8 lb/MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limit: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit: See Facility-Wide Conditions

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project (SEP):

Equipment parameters:

As part of a multi-stage washer system the emission unit associated with this emission point will consist of a 3.8 MMBtu/hr heater for the hot alkaline washer system in Stage 1. An extended drain zone will be provided to prevent chemical drag out to the second stage, a clean water rinse. A power and free conveyer system will be utilized to supply parts to and from the washer system. The entire washer system shall be approximately 150 feet long, 8 to 10 feet wide, and constructed of mild and stainless steel.

Authority for Requirement: Paragraph 3d. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999.

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Process throughput:

The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.SS

Associated Equipment

Associated Emission Unit ID Number: 6.SS

Applicable Requirements

Emission Unit vented through this Emission Point: 6.SS
Emission Unit Description: Stage 3 Burner
Raw Material/Fuel: Natural Gas
Rated Capacity: 2.5 MMBtu/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter
Emission Limit: 15.3 lb/MMCF of Propane or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter
Emission Limit: 0.8 lb/MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limit: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit: See Facility-Wide Conditions

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project (SEP):

Equipment parameters:

As part of a multi-stage washer system the emission unit associated with this emission point will consist of a 2.5 MMBtu/hr heater for the hot iron phosphate washer system in Stage 3. An extended drain zone will be provided to prevent chemical drag out to the fourth stage, a clean water rinse. A power and free conveyer system will be utilized to supply parts to and from the washer system. The entire washer system shall be approximately 150 feet long, 8 to 10 feet wide, and constructed of mild and stainless steel.

Authority for Requirement: Paragraph 3d. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999.

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Process throughput:

The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.TT

Associated Equipment

Associated Emission Unit ID Number: 6.TT

Applicable Requirements

Emission Unit vented through this Emission Point: 6.TT
Emission Unit Description: Stage 5 Burner
Raw Material/Fuel: Natural Gas
Rated Capacity: 1.5 MMBtu/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter
Emission Limit: 15.3 lb/MMCF of Propane or Natural Gas
Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer
Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter
Emission Limit: 0.8 lb/MMBtu
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
Emission Limit: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit: See Facility-Wide Conditions

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project (SEP):

Equipment parameters:

As part of a multi-stage washer system the emission unit associated with this emission point will consist of a 1.5 MMBtu/hr heater for the hot metal sealer washer system in Stage 5. A power and free conveyer system will be utilized to supply parts to and from the washer system. The entire washer system shall be approximately 150 feet long, 8 to 10 feet wide, and constructed of mild and stainless steel.

Authority for Requirement: Paragraph 3d. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999.

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Process throughput:

The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.UU

Associated Equipment

Associated Emission Unit ID Number: 6.UU

Applicable Requirements

Emission Unit vented through this Emission Point: 6.UU
Emission Unit Description: Stage 5 Washer
Raw Material/Fuel: Hot Metal Sealer
Rated Capacity: 300 gal/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter
Emission Limit: 0.01 gr/scf
Authority for Requirement: 567 IAC 23.4(13)

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project (SEP):

Equipment parameters:

As part of a multi-stage washer system the emission unit associated with this emission point will consist of a heated metal sealing solution utilizing a sequenced manifold of spray nozzle tips to prepare the surface of the metal parts for polyurethane coating. A power and free conveyer system will be utilized to supply parts to and from the washer system. The entire washer system shall be approximately 150 feet long, 8 to 10 feet wide, and constructed of mild and stainless steel.

Authority for Requirement: Paragraph 3d. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999.

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.AG1

Associated Equipment

Associated Emission Unit ID Numbers: 1.AG
Emissions Control Equipment ID Number: 1.AG
Emissions Control Equipment Description: Paper Filter

Applicable Requirements

Emission Unit vented through this Emission Point: 1.AG
Emission Unit Description: Finish Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Indicator Opacity:⁽¹⁾

⁽¹⁾ If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: 567 IAC 23.3(2)"d"
Iowa DNR Construction Permit 97-A-972-S3

Pollutant: PM₁₀
Emission Limit: 1.0 lb/hr
Authority for Requirement: Iowa DNR Construction Permit 97-A-972-S3

Pollutant: Particulate Matter
Emission Limit: 0.01 gr/dscf
Authority for Requirement: 567 IAC 23.4(13)
Iowa DNR Construction Permit 97-A-972-S3

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-972-S3

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project (SEP):

Equipment parameters:

The emission unit associated with this emission point will maintain a Graco, multi-color, precision mix system with two gun flush boxes, solvent meters, and solvent valves. The system will be supplied with a microprocessor which will control solvent, paint, and catalyst flow to a mixing tube adjacent to the emission unit and record the cumulative amount of the exact volume or weight of paint, solvent, or catalyst utilized in the emission unit. The system will be interlocked with the two Graco gun flush boxes, and the guns will be interlocked with the fans of the paint spray booth.

Authority for Requirement: Paragraph 3b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The report shall evaluate the performance of the SEP and document the extent of VOC emissions reductions. Vermeer shall conduct cumulative mass balance calculations to determine the actual effect measured against the 1997 baseline of 122.94 tons of VOC emitted per year. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999. For additional reporting and recordkeeping see the Facility-Wide Conditions.

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889
Iowa DNR Construction Permit 97-A-972-S3

Emission Point Characteristics

This emission point shall conform to the following conditions.

Stack Height (feet, from the ground): 43.5

Stack Diameter (inches): 36

Stack Exhaust Flow Rate (scfm): 24,000

Stack Temperature (°F): Ambient

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-972-S3

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Stack Testing:

Pollutant: Particulate Matter
Stack Test to be Completed by (date): October 18, 2001
Test Method: Iowa Compliance Sampling Manual
Authority for Requirement: 567 IAC 22.108(3)

The higher of the results for emissions from the compliance stack testing of emission points 1.AG1 and 1.AG2 will be used to calculate actual emissions for this source until such time as more recent data becomes available. If the source test does not demonstrate compliance this permit will be reopened to add a compliance plan and operation and maintenance requirements.

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.AG2

Associated Equipment

Associated Emission Unit ID Numbers:..... 1.AG
Emissions Control Equipment ID Number: 1.AG
Emissions Control Equipment Description: Paper Filter

Applicable Requirements

Emission Unit vented through this Emission Point: 1.AG
Emission Unit Description: Finish Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Indicator Opacity:⁽¹⁾

⁽¹⁾ If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: 567 IAC 23.3(2)"d"
Iowa DNR Construction Permit 97-A-973-S3

Pollutant: PM₁₀
Emission Limit: 1.0 lb/hr
Authority for Requirement: Iowa DNR Construction Permit 97-A-973-S3

Pollutant: Particulate Matter
Emission Limit: 0.01 gr/dscf
Authority for Requirement: 567 IAC 23.4(13)
Iowa DNR Construction Permit 97-A-973-S3

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-973-S3

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project (SEP):

Equipment parameters:

The emission unit associated with this emission point will maintain a Graco, multi-color, precision mix system with two gun flush boxes, solvent meters, and solvent valves. The system will be supplied with a microprocessor which will control solvent, paint, and catalyst flow to a mixing tube adjacent to the emission unit and record the cumulative amount of the exact volume or weight of paint, solvent, or catalyst utilized in the emission unit. The system will be interlocked with the two Graco gun flush boxes, and the guns will be interlocked with the fans of the paint spray booth.

Authority for Requirement: Paragraph 3b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The report shall evaluate the performance of the SEP and document the extent of VOC emissions reductions. Vermeer shall conduct cumulative mass balance calculations to determine the actual effect measured against the 1997 baseline of 122.94 tons of VOC emitted per year. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999. For additional reporting and recordkeeping see the Facility-Wide Conditions.

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889
Iowa DNR Construction Permit 97-A-973-S3

Emission Point Characteristics

This emission point shall conform to the following conditions.

Stack Height (feet, from the ground): 43.5

Stack Diameter (inches): 36

Stack Exhaust Flow Rate (scfm): 24,000

Stack Temperature (°F): Ambient

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-973-S3

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Stack Testing:

Pollutant: Particulate Matter
Stack Test to be Completed by (date): October 18, 2001
Test Method: Iowa Compliance Sampling Manual
Authority for Requirement: 567 IAC 22.108(3)

The higher of the results for emissions from the compliance stack testing of emission points 1.AG1 and 1.AG2 will be used to calculate actual emissions for this source until such time as more recent data becomes available. If the source test does not demonstrate compliance this permit will be reopened to add a compliance plan and operation and maintenance requirements.

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.K

Associated Equipment

Associated Emission Unit ID Numbers: 1.K
Emissions Control Equipment ID Number: 1.K
Emissions Control Equipment Description: Paper Filter

Applicable Requirements

Emission Unit vented through this Emission Point: 1.K
Emission Unit Description: Parts Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Indicator Opacity:⁽¹⁾

⁽¹⁾ If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: 567 IAC 23.3(2)"d"
Iowa DNR Construction Permit 97-A-974-S3

Pollutant: Particulate Matter
Emission Limit: 0.01 gr/dscf
Authority for Requirement: 567 IAC 23.4(13)
Iowa DNR Construction Permit 97-A-974-S3

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-974-S3

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project (SEP):

Equipment parameters:

The emission unit associated with this emission point will maintain a Graco, multi-color, precision mix system with two gun flush boxes, solvent meters, and solvent valves. The system will be supplied with a microprocessor which will control solvent, paint, and catalyst flow to a mixing tube adjacent to the emission unit and record the cumulative amount of the exact volume or weight of paint, solvent, or catalyst utilized in the emission unit. The system will be interlocked with the two Graco gun flush boxes, and the guns will be interlocked with the fans of the paint spray booth.

Authority for Requirement: Paragraph 3b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The report shall evaluate the performance of the SEP and document the extent of VOC emissions reductions. Vermeer shall conduct cumulative mass balance calculations to determine the actual effect measured against the 1997 baseline of 122.94 tons of VOC emitted per year. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999. For additional reporting and recordkeeping see the Facility-Wide Conditions.

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889
Iowa DNR Construction Permit 97-A-974-S3

Emission Point Characteristics

This emission point shall conform to the following conditions.

Stack Height (feet, from the ground): 42.1

Stack Diameter (inches): 34

Stack Exhaust Flow Rate (scfm): 21,195

Stack Temperature (°F): Ambient

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-974-S3

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Stack Testing:

Pollutant: Particulate Matter
Stack Test to be Completed by (date): October 18, 2001
Test Method: Iowa Compliance Sampling Manual
Authority for Requirement: 567 IAC 22.108(3)

This stack test will represent the compliance testing for emission points 1.K, 2.H, and 5.J. In the event that a stack test of one of the other listed emission points is more suitable it may be tested to fulfill the requirements. Suitability will be determined by the Stack Test Observation Coordinator of the Air Quality Bureau Compliance Assistance Section. The results of the compliance stack testing will be used to calculate actual emissions for the listed sources until such time as more recent data becomes available. If the source test does not demonstrate compliance this permit will be reopened to add a compliance plan and operation and maintenance requirements.

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.G1

Associated Equipment

Associated Emission Unit ID Numbers: 5.G
Emissions Control Equipment ID Number: 5.G
Emissions Control Equipment Description: Paper Filter

Applicable Requirements

Emission Unit vented through this Emission Point: 5.G
Emission Unit Description: Finish Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Indicator Opacity: ⁽¹⁾

⁽¹⁾ If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: 567 IAC 23.3(2)"d"
Iowa DNR Construction Permit 97-A-1030-S2

Pollutant: PM₁₀
Emission Limit: 1.22 lb/hr
Authority for Requirement: Iowa DNR Construction Permit 97-A-1030-S2

Pollutant: Particulate Matter
Emission Limit: 0.01 gr/dscf
Authority for Requirement: 567 IAC 23.4(13)
Iowa DNR Construction Permit 97-A-1030-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-1030-S2

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project (SEP):

Equipment parameters:

The emission unit associated with this emission point will maintain a Graco, multi-color, precision mix system with two gun flush boxes, solvent meters, and solvent valves. The system will be supplied with a microprocessor which will control solvent, paint, and catalyst flow to a mixing tube adjacent to the emission unit and record the cumulative amount of the exact volume or weight of paint, solvent, or catalyst utilized in the emission unit. The system will be interlocked with the two Graco gun flush boxes, and the guns will be interlocked with the fans of the paint spray booth.

Authority for Requirement: Paragraph 3c. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The report shall evaluate the performance of the SEP and document the extent of VOC emissions reductions. Vermeer shall conduct cumulative mass balance calculations to determine the actual effect measured against the 1997 baseline of 122.94 tons of VOC emitted per year. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999. For additional reporting and recordkeeping see the Facility-Wide Conditions

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889
Iowa DNR Construction Permit 97-A-1030-S2

Emission Point Characteristics

This emission point shall conform to the following conditions.

Stack Height (feet, from the ground): 40.5

Stack Diameter (inches): 42.0

Stack Exhaust Flow Rate (scfm): 29,000

Stack Temperature (°F): Ambient

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-1030-S2

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Stack Testing:

Pollutant: Particulate Matter
Stack Test to be Completed by (date): October 18, 2001
Test Method: Iowa Compliance Sampling Manual
Authority for Requirement: 567 IAC 22.108(3)

The stack tests required for emission points 5.G1 and 5.G2 will represent the compliance testing for emission points 5.G1, 5G2, 6.M1, and 6.M2. In the event that a stack test of one of the other listed emission points is more suitable it may be tested to fulfill the requirements. Suitability will be determined by the Stack Test Observation Coordinator of the Air Quality Bureau Compliance Assistance Section. The higher of the results for emissions from the compliance stack testing of emission points 5.G1 and 5.G2 will be used to calculate actual emissions for the listed sources until such time as more recent data becomes available. If the source tests do not demonstrate compliance this permit will be reopened to add a compliance plan and operation and maintenance requirements.

The owner of this equipment or the owner’s authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source’s compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility’s implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.G2

Associated Equipment

Associated Emission Unit ID Numbers: 5.G
Emissions Control Equipment ID Number: 5.G
Emissions Control Equipment Description: Paper Filter

Applicable Requirements

Emission Unit vented through this Emission Point: 5.G
Emission Unit Description: Finish Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Indicator Opacity: ⁽¹⁾

⁽¹⁾ If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: 567 IAC 23.3(2)"d"
Iowa DNR Construction Permit 97-A-1031-S2

Pollutant: PM₁₀
Emission Limit: 1.22 lb/hr
Authority for Requirement: Iowa DNR Construction Permit 97-A-1031-S2

Pollutant: Particulate Matter
Emission Limit: 0.01 gr/dscf
Authority for Requirement: 567 IAC 23.4(13)
Iowa DNR Construction Permit 97-A-1031-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-1031-S2

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project (SEP):

Equipment parameters:

The emission unit associated with this emission point will maintain a Graco, multi-color, precision mix system with two gun flush boxes, solvent meters, and solvent valves. The system will be supplied with a microprocessor which will control solvent, paint, and catalyst flow to a mixing tube adjacent to the emission unit and record the cumulative amount of the exact volume or weight of paint, solvent, or catalyst utilized in the emission unit. The system will be interlocked with the two Graco gun flush boxes, and the guns will be interlocked with the fans of the paint spray booth.

Authority for Requirement: Paragraph 3b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The report shall evaluate the performance of the SEP and document the extent of VOC emissions reductions. Vermeer shall conduct cumulative mass balance calculations to determine the actual effect measured against the 1997 baseline of 122.94 tons of VOC emitted per year. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999. For additional reporting and recordkeeping see the Facility-Wide Conditions

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889
Iowa DNR Construction Permit 97-A-1031-S2

Emission Point Characteristics

This emission point shall conform to the following conditions.

Stack Height (feet, from the ground): 40.5

Stack Diameter (inches): 42.0

Stack Exhaust Flow Rate (scfm): 29,000

Stack Temperature (°F): Ambient

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-1031-S2

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Stack Testing:

Pollutant: Particulate Matter
Stack Test to be Completed by (date): October 18, 2001
Test Method: Iowa Compliance Sampling Manual
Authority for Requirement: 567 IAC 22.108(3)

The stack tests required for emission points 5.G1 and 5.G2 will represent the compliance testing for emission points 5.G1, 5.G2, 6.M1, and 6.M2. In the event that a stack test of one of the other listed emission points is more suitable it may be tested to fulfill the requirements. Suitability will be determined by the Stack Test Observation Coordinator of the Air Quality Bureau Compliance Assistance Section. The higher of the results for emissions from the compliance stack testing of emission points 5.G1 and 5.G2 will be used to calculate actual emissions for the listed sources until such time as more recent data becomes available. If the source tests do not demonstrate compliance this permit will be reopened to add a compliance plan and operation and maintenance requirements.

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 5.J

Associated Equipment

Associated Emission Unit ID Numbers:..... 5.J
Emissions Control Equipment ID Number: 5.J
Emissions Control Equipment Description: Paper Filter

Applicable Requirements

Emission Unit vented through this Emission Point: 5.J
Emission Unit Description: Parts Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Indicator Opacity:⁽¹⁾

⁽¹⁾ If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: 567 IAC 23.3(2)"d"
Iowa DNR Construction Permit 97-A-1033-S2

Pollutant: Particulate Matter
Emission Limit: 0.01 gr/dscf
Authority for Requirement: 567 IAC 23.4(13)
Iowa DNR Construction Permit 97-A-1033-S2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-1033-S2

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project (SEP):

Equipment parameters:

The emission unit associated with this emission point will maintain a Graco, multi-color, precision mix system with two gun flush boxes, solvent meters, and solvent valves. The system will be supplied with a microprocessor which will control solvent, paint, and catalyst flow to a mixing tube adjacent to the emission unit and record the cumulative amount of the exact volume or weight of paint, solvent, or catalyst utilized in the emission unit. The system will be interlocked with the two Graco gun flush boxes, and the guns will be interlocked with the fans of the paint spray booth.

Authority for Requirement: Paragraph 3c. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The report shall evaluate the performance of the SEP and document the extent of VOC emissions reductions. Vermeer shall conduct cumulative mass balance calculations to determine the actual effect measured against the 1997 baseline of 122.94 tons of VOC emitted per year. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999. For additional reporting and recordkeeping see the Facility-Wide Conditions

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889
Iowa DNR Construction Permit 97-A-1033-S2

Emission Point Characteristics

This emission point shall conform to the following conditions.

Stack Height (feet, from the ground): 43.8

Stack Diameter (inches): 42.0

Stack Exhaust Flow Rate (scfm): 20,000

Stack Temperature (°F): Ambient

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 97-A-1033-S2

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Stack Testing: The stack test required for emission point 1.K will represent the compliance testing for this emission point.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.HH

Associated Equipment

Associated Emission Unit ID Numbers:..... 6.HH
Emissions Control Equipment ID Number: 6.HH
Emissions Control Equipment Description: Paper Filter

Applicable Requirements

Emission Unit vented through this Emission Point: 6.HH
Emission Unit Description: Primer Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Indicator Opacity:⁽¹⁾

⁽¹⁾ If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: 567 IAC 23.3(2)"d"
Iowa DNR Construction Permit 97-A-975-S3

Pollutant: PM₁₀
Emission Limit: 0.9 lb/hr
Authority for Requirement: Iowa DNR Construction Permit 97-A-975-S3

Pollutant: Particulate Matter
Emission Limit: 0.01 gr/dscf
Authority for Requirement: 567 IAC 23.4(13)
Iowa DNR Construction Permit 97-A-975-S3

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-975-S3

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project (SEP):

Equipment parameters:

The emission unit associated with this emission point will consist of the booth, an exhaust fan, and a duct extending from a sixteen (16) foot long by four (4) foot wide by six (6) foot deep exhaust pit to ten (10) feet above the peak of the roof. The emission unit will maintain a Binks microprocessor controlled, multi-color, precision mix system with two gun flush boxes, solvent meters, and solvent valves. The system will be panel mounted approximately five (5) feet from the nearest opening and will control solvent, paint, and catalyst flow to a mixing tube adjacent to the emission unit and record the cumulative amount of the exact volume or weight of primer, paint, solvent, or catalyst utilized in the emission unit. The system will be interlocked with the two Graco gun flush boxes, and the guns will be interlocked with the fan mix system and electronic generators of the paint spray booth.

Authority for Requirement: Paragraph 3e. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The report shall evaluate the performance of the SEP and document the extent of VOC emissions reductions. Vermeer shall conduct cumulative mass balance calculations to determine the actual effect measured against the 1997 baseline of 122.94 tons of VOC emitted per year. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999. For additional reporting and recordkeeping see the Facility-Wide Conditions

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889
Iowa DNR Construction Permit 97-A-975-S3

Emission Point Characteristics

This emission point shall conform to the following conditions.

Stack Height (feet, from the ground): 44.5
Stack Diameter (inches): 42.0
Stack Exhaust Flow Rate (scfm): 20,000
Stack Temperature (°F): Ambient
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 97-A-975-S3

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Stack Testing:

Pollutant: Particulate Matter
Stack Test to be Completed by (date): Done*
Test Method: Iowa Compliance Sampling Manual
Authority for Requirement: 567 IAC 22.108(3)

This stack test will represent the compliance testing for emission points 6.HH and 6.S. In the event that a stack test of the other listed emission point is more suitable it may be tested to fulfill the requirements. Suitability will be determined by the Stack Test Observation Coordinator of the Air Quality Bureau Compliance Assistance Section. The results of the compliance stack testing will be used to calculate actual emissions for the listed sources until such time as more recent data becomes available. If the source test does not demonstrate compliance this permit will be reopened to add a compliance plan and operation and maintenance requirements.

* The test report, received September 25, 2000, for the testing conducted August 21-22, 2000, has been reviewed. This testing is acceptable for showing this source is in compliance with its particulate limit, 0.01 gr/dscf, and its PM₁₀ limit, 0.9 lb/hr. Acceptance of these results does not relieve Vermeer Manufacturing of any responsibility to operate and maintain this source in compliance.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Point ID Number: 6.M1

Associated Equipment

Associated Emission Unit ID Numbers:..... 6.M
Emissions Control Equipment ID Number: 6.M
Emissions Control Equipment Description: Paper Filter

Applicable Requirements

Emission Unit vented through this Emission Point: 6.M
Emission Unit Description: Finish Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Indicator Opacity:⁽¹⁾

⁽¹⁾ If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: 567 IAC 23.3(2)"d"
Iowa DNR Construction Permit 97-A-295-S3

Pollutant: PM₁₀
Emission Limit: 1.22 lb/hr
Authority for Requirement: Iowa DNR Construction Permit 97-A-295-S3

Pollutant: Particulate Matter
Emission Limit: 0.01 gr/dscf
Authority for Requirement: 567 IAC 23.4(13)
Iowa DNR Construction Permit 97-A-295-S3

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-295-S3

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project (SEP):

Equipment parameters:

The emission unit associated with this emission point will consist of the booth, an exhaust fan, and a duct extending from a sixteen (16) foot long by four (4) foot wide by six (6) foot deep exhaust pit to ten (10) feet above the peak of the roof. The emission unit will maintain a Binks microprocessor controlled, multi-color, precision mix system with two gun flush boxes, solvent meters, and solvent valves. The system will be panel mounted approximately five (5) feet from the nearest opening and will control solvent, paint, and catalyst flow to a mixing tube adjacent to the emission unit and record the cumulative amount of the exact volume or weight of primer, paint, solvent, or catalyst utilized in the emission unit. The system will be interlocked with the two Graco gun flush boxes, and the guns will be interlocked with the fan mix system and electronic generators of the paint spray booth.

Authority for Requirement: Paragraph 3e. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The report shall evaluate the performance of the SEP and document the extent of VOC emissions reductions. Vermeer shall conduct cumulative mass balance calculations to determine the actual effect measured against the 1997 baseline of 122.94 tons of VOC emitted per year. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999. For additional reporting and recordkeeping see the Facility-Wide Conditions

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889
Iowa DNR Construction Permit 97-A-295-S3

Emission Point Characteristics

This emission point shall conform to the following conditions.

Stack Height (feet, from the ground): 43.5
Stack Diameter (inches): 42.0
Stack Exhaust Flow Rate (scfm): 28,620
Stack Temperature (°F): Ambient
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 97-A-295-S3

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Stack Testing: The stack tests required for emission points 5.G1 and 5.G2 will represent the compliance testing for this emission point.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source’s compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility’s implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 6.M2

Associated Equipment

Associated Emission Unit ID Numbers: 6.M
Emissions Control Equipment ID Number: 6.M
Emissions Control Equipment Description: Paper Filter

Applicable Requirements

Emission Unit vented through this Emission Point: 6.M
Emission Unit Description: Primer Paint Booth
Raw Material/Fuel: Paints, Primers, and Solvents
Rated Capacity: 15 gal/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Indicator Opacity:⁽¹⁾

⁽¹⁾ If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: 567 IAC 23.3(2)"d"
Iowa DNR Construction Permit 97-A-296-S3

Pollutant: PM₁₀
Emission Limit: 1.22 lb/hr
Authority for Requirement: Iowa DNR Construction Permit 97-A-296-S3

Pollutant: Particulate Matter
Emission Limit: 0.01 gr/dscf
Authority for Requirement: 567 IAC 23.4(13)
Iowa DNR Construction Permit 97-A-296-S3

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 97-A-296-S3

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project (SEP):

Equipment parameters:

The emission unit associated with this emission point will consist of the booth, an exhaust fan, and a duct extending from a sixteen (16) foot long by four (4) foot wide by six (6) foot deep exhaust pit to ten (10) feet above the peak of the roof. The emission unit will maintain a Binks microprocessor controlled, multi-color, precision mix system with two gun flush boxes, solvent meters, and solvent valves. The system will be panel mounted approximately five (5) feet from the nearest opening and will control solvent, paint, and catalyst flow to a mixing tube adjacent to the emission unit and record the cumulative amount of the exact volume or weight of primer, paint, solvent, or catalyst utilized in the emission unit. The system will be interlocked with the two Graco gun flush boxes, and the guns will be interlocked with the fan mix system and electronic generators of the paint spray booth.

Authority for Requirement: Paragraph 3e. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The report shall evaluate the performance of the SEP and document the extent of VOC emissions reductions. Vermeer shall conduct cumulative mass balance calculations to determine the actual effect measured against the 1997 baseline of 122.94 tons of VOC emitted per year. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999. For additional reporting and recordkeeping see the Facility-Wide Conditions

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889
Iowa DNR Construction Permit 97-A-296-S3

Emission Point Characteristics

This emission point shall conform to the following conditions.

Stack Height (feet, from the ground): 43.5
Stack Diameter (inches): 42.0
Stack Exhaust Flow Rate (scfm): 28,620
Stack Temperature (°F): Ambient
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 97-A-296-S3

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Stack Testing: The stack tests required for emission points 5.G1 and 5.G2 will represent the compliance testing for this emission point.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source’s compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility’s implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table PAINT

Applicable Requirements

(The following requirements apply to the emission units identified in Table PAINT)

Emission Unit vented through this Emission Point: See Table PAINT

Emission Unit Description: Paint Booth

Raw Material/Fuel: Paints, Primers, and Solvents

Rated Capacity: See Table PAINT

Table PAINT

Emission Point Number	Associated Emission Unit Number	Control Equipment Number	Control Equipment Description	Rated Capacity (gal/hr)
2.AI1	2.AI	2.AI	Paper Filter	15
2.AI2	2.AI	2.AI	Paper Filter	15
2.F1	2.F	2.F	Paper Filter	15
2.F2	2.F	2.F	Paper Filter	15
2.H	2.H	2.H	Paper Filter	15
3.F1	3.F	3.F	Paper Filter	15
3.F2	3.F	3.F	Paper Filter	15
3.HH	3.HH	3.HH	Paper Filter	5.625
3.II	3.II	3.II	Paper Filter	5.625
4.F	4.F	4.F	Paper Filter	15
4.G1	4.G	4.G	Paper Filter	15
4.G2	4.G	4.G	Paper Filter	15
6.N	6.N	6.N	Paper Filter	15
6.S	6.S	6.S	Paper Filter	15

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point identified in Table PAINT2 shall not exceed the following specified levels.

Table PAINT2

Emission Point Number	Associated Emission Unit Number	Opacity Limit	Indicator Opacity	PM₁₀ Limit (lb/hr)	PM Limit (gr/dscf)	Construction Permit #
2.AI1	2.AI1	40 %	VE ⁽¹⁾		0.01	98-A-859-S2
2.AI2	2.AI2	40 %	VE ⁽¹⁾		0.01	98-A-860-S2
2.F1	2.F1	40 %	VE ⁽¹⁾	0.9	0.01	98-A-075-S2
2.F2	2.F2	40 %	VE ⁽¹⁾	0.9	0.01	98-A-076-S2
2.H	2.H	40 %	VE ⁽¹⁾		0.01	98-A-077-S2
3.F1	3.F1	40 %	VE ⁽¹⁾	0.9	0.01	98-A-004-S2
3.F2	3.F2	40 %	VE ⁽¹⁾	0.9	0.01	98-A-005-S2
3.HH	3.HH	40 %	VE ⁽¹⁾		0.01	99-A-688-S1
3.II	3.II	40 %	VE ⁽¹⁾		0.01	99-A-689-S1
4.F	4.F	40 %	VE ⁽¹⁾		0.01	98-A-032-S2
4.G1	4.G1	40 %	VE ⁽¹⁾	0.9	0.01	98-A-033-S2
4.G2	4.G2	40 %	VE ⁽¹⁾	0.9	0.01	98-A-034-S2
6.N	6.N	40 %	VE ⁽¹⁾		0.01	97-A-297-S2
6.S	6.S	40 %	VE ⁽¹⁾		0.01	96-A-1216-S4

Pollutant: Opacity

Emission Limit: 40%

Indicator Opacity:..... ⁽¹⁾

⁽¹⁾ If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permits specified in Table PAINT2

Pollutant: PM₁₀

Emission Limit: As specified in Table PAINT2

Authority for Requirement: Iowa DNR Construction Permits specified in Table PAINT2

Pollutant: PM

Emission Limit: 0.01 gr/dscf

Authority for Requirement: 567 IAC 23.4(13)

Iowa DNR Construction Permits specified in Table PAINT2

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permits specified in Table PAINT2

Pollutant: Hazardous Air Pollutants (HAP)

Emission Limit: See Facility-Wide Conditions

Emission Point Characteristics

These emission points shall conform to the conditions specified in Table PAINT3.

Table PAINT3

Emission Point Number	Emission Unit Number	Construction Permit #	Stack Characteristics				Vertical Unobstructed Discharge Required?
			Height (feet)	Diameter (inches)	Exhaust Flowrate (scfm)	Exhaust Temp. (F)	
2.AI1	2.AI	98-A-859-S2	36.2	42.0	16,875	Ambient	Yes
2.AI2	2.AI	98-A-860-S2	36.2	42.0	16,875	Ambient	Yes
2.F1	2.F	98-A-075-S2	46.2	42.0	21,000	Ambient	Yes
2.F2	2.F	98-A-076-S2	46.2	42.0	21,000	Ambient	Yes
2.H	2.H	98-A-077-S2	42.5	42.0	21,195	Ambient	Yes
3.F1	3.F	98-A-004-S2	39	42.0	21,000	Ambient	Yes
3.F2	3.F	98-A-005-S2	39	42.0	21,000	Ambient	Yes
3.HH	3.HH	99-A-688-S1	37.5	48.0	24,000	Ambient	Yes
3.II	3.II	99-A-689-S1	37.5	48.0	24,000	Ambient	Yes
4.F	4.F	98-A-032-S2	39.5	42.0	28,000	Ambient	Yes
4.G1	4.G	98-A-033-S2	39.5	42.0	21,000	Ambient	Yes
4.G2	4.G	98-A-034-S2	39.5	42.0	21,000	Ambient	Yes
6.N	6.N	97-A-297-S2	40.2	42.0	16,000	Ambient	Yes
6.S	6.S	96-A-1216-S4	44.5	42.0	20,000	Ambient	Yes

Authority for Requirement: Iowa DNR Construction Permits specified in Table PAINT3

Periodic Monitoring Requirements

The owner/operator of each piece of equipment identified in Table PAINT4 shall comply with the following periodic monitoring requirements.

Stack Testing:

Table PAINT4

Emission Point Number	Test Required	Test Method	Test To Be Completed By	Test Note	Authority for Requirement
2.AI1	PM	Iowa Compliance Sampling Manual*	October 18, 2001	1	567 IAC 22.108(3)
2.AI2	PM	Iowa Compliance Sampling Manual*	October 18, 2001	1	567 IAC 22.108(3)
2.F1				2	
2.F2				2	
2.H				3	
3.F1				2	
3.F2				2	
3.HH	PM	Iowa Compliance Sampling Manual*	Done	4	IDNR Construction Permit 99-A-688-S1
3.II	PM	Iowa Compliance Sampling Manual*	Done	4	IDNR Construction Permit 99-A-689-S1
4.F	PM	Iowa Compliance Sampling Manual*	Done	5	567 IAC 22.108(3)
4.G1	PM	Iowa Compliance Sampling Manual*	October 18, 2001	2	567 IAC 22.108(3)
4.G2	PM	Iowa Compliance Sampling Manual*	October 18, 2001	2	567 IAC 22.108(3)
6.N	PM	Iowa Compliance Sampling Manual*	October 18, 2001		567 IAC 22.108(3)
6.S				6,7	

*or approved alternative test method

Test Notes:

1. The higher of the results for emissions from the compliance stack testing of emission points 2.AI1 and 2.AI 2 will be used to calculate actual emissions for this source until such time as more recent data becomes available. If the source test does not demonstrate compliance this permit will be reopened to add a compliance plan and operation and maintenance requirements.
2. The stack tests required for emission points 4.G1 and 4.G2 will represent the compliance testing for emission points 2.F1, 2.F2, 3.F1, 3.F2, 4.G1, and 4.G2. In the event that a stack test of one of the other listed emission points is more suitable it may be tested to fulfill the requirements. Suitability will be determined by the Stack Test Observation Coordinator of the Air Quality Bureau Compliance Assistance Section. The higher of the results for emissions from the compliance stack testing of emission points 4.G1 and 4.G2 will be used to calculate actual emissions for the listed sources until such time as more recent data

becomes available. If the source test does not demonstrate compliance this permit will be reopened to add a compliance plan and operation and maintenance requirements.

3. The stack test required for emission point 1.K will represent the compliance testing for this emission point.
4. The test report, received August 9, 2000, for the testing conducted June 15, 2000, has been reviewed. This testing is acceptable for showing that EP 3.HH and EP 3.II are in compliance with their particulate limit, 0.01 gr/dscf. Acceptance of these results does not relieve Vermeer Manufacturing of any responsibility to operate and maintain these sources in compliance.
5. The test report, received September 25, 2000, for the testing conducted August 21-22, 2000, has been reviewed. This testing is acceptable for showing that EP 4.F is in compliance with its particulate limit, 0.01 gr/dscf. Acceptance of these results does not relieve Vermeer Manufacturing of any responsibility to operate and maintain this source in compliance.
6. The stack test required for emission point 6.HH will represent the compliance testing for this emission point.
7. The test report, received September 25, 2000, for the testing conducted August 21-22, 2000, has been reviewed. This testing is acceptable for showing that EP 6.HH is in compliance with its particulate limit, 0.01 gr/dscf, and its PM₁₀ limit, 0.9 lb/hr. Acceptance of these results does not relieve Vermeer Manufacturing of any responsibility to operate and maintain this source in compliance.

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice. Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table OVEN

Applicable Requirements

(The following requirements apply to the emission units identified in Table OVEN)

Table OVEN

Emission Point Number	Associated Emission Unit Number	Emission Unit Description	Fuel	Rated Capacity (MMBtu/hr)
1.J	1.J	Paint Oven	LPG or NG	2.0
2.I	2.I	Paint Oven	LPG or NG	0.108
3.B	3.B	Paint Oven	NG	2.0
3.JJ	3.JJ	Paint Oven	NG	2.6
3.MM	3.MM	Paint Oven	NG	2.6
4.E	4.E	Paint Oven	NG	1.08
5.I	5.I	Paint Oven	NG	1.5
6.F	6.F	Paint Oven	NG	0.9

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point identified in Table OVEN2 shall not exceed the following specified levels.

Table OVEN2

Emission Point Number	Associated Emission Unit Number	Opacity Limit	Indicator Opacity	PM Limit (gr/dscf)	SO₂ Limit	Construction Permit #
1.J	1.J	40 %	VE ⁽¹⁾	0.1	500 ppmv	98-A-094-S1
2.I	2.I	40 %	VE ⁽¹⁾	0.1	500 ppmv	98-A-078-S1
3.B	3.B	40 %	VE ⁽¹⁾	0.1	500 ppmv	98-A-003-S1
3.JJ	3.JJ	40 %	VE ⁽²⁾	0.1	500 ppmv	99-A-686-S1
3.MM	3.MM	40 %	VE ⁽²⁾	0.1	500 ppmv	00-A-562
4.E	4.E	40 %	VE ⁽¹⁾	0.1	500 ppmv	98-A-031-S1
5.I	5.I	40 %	VE ⁽¹⁾	0.1	500 ppmv	97-A-1032-S1
6.F	6.F	40 %	VE ⁽¹⁾	0.1	500 ppmv	96-A-1217-S3

Pollutant: Opacity
Emission Limit: 40 %
Indicator Opacity.....⁽¹⁾

⁽¹⁾ If visible emissions are observed other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Indicator Opacity.....⁽²⁾

⁽²⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence of the indicator opacity of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: 567 IAC 23.3(2)"d"
Iowa DNR Construction Permits specified in Table OVEN2

Pollutant: Particulate Matter

Emission Limit: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"
Iowa DNR Construction Permits specified in Table OVEN2

Pollutant: Sulfur Dioxide (SO₂)

Emission Limit: 500 ppmv

Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)

Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permits specified in Table OVEN2

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permits specified in Table OVEN2

Pollutant: Hazardous Air Pollutants (HAP)

Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of each piece of equipment identified in Table OVEN shall comply with the following operational limits and requirements.

Process throughput:

Each oven shall be fired by natural gas or propane only.

Authority for Requirement: Iowa DNR Construction Permits specified in Table OVEN2

Emission Point Characteristics

These emission points shall conform to the conditions listed in Table OVEN3.

Table OVEN3

Emission Point Number	Emission Unit Number	Construction Permit #	Stack Characteristics				Vertical Unobstructed Discharge Required?
			Height (feet)	Diameter (inches)	Exhaust Flowrate (scfm)	Exhaust Temp. (F)	
1.J	1.J	98-A-094-S1	35	12	1,076	106	Yes
2.I	2.I	98-A-078-S1	34	12	1,100	150	Yes
3.B	3.B	98-A-003-S1	35.5	12	860	90	Yes
3.JJ	3.JJ	99-A-686-S1	35.5	10	2,500	180	Yes
3.MM	3.MM	00-A-562	35.5	10	2,500	180	Yes
4.E	4.E	98-A-031-S1	31	12	1,210	125	Yes
5.I	5.I	97-A-1032-S1	31.5	14	410	102	Yes
6.F	6.F	96-A-1217-S3	28.6	11	1,500	325	Yes

Authority for Requirement: Iowa DNR Construction Permits specified in Table OVEN3.

Periodic Monitoring Requirements

The owner/operator of each piece of equipment identified in Table OVEN shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table KITCHEN

Applicable Requirements

(The following requirements apply to the emission units identified in Table KITCHEN)

Table KITCHEN

Emission Point Number	Associated Emission Unit Number(s)	Emission Unit Description	Raw Material/Fuel	Rated Capacity (bbl)
1.AP	1.AP	Paint Kitchen	Paints, Primers, and Solvents	3
1.AQ	1.AQ1	Paint Kitchen	Paints, Primers, and Solvents	3
	1.AQ2	Paint Kitchen	Paints, Primers, and Solvents	3
2.AF	2.AF1	Paint Kitchen	Paints, Primers, and Solvents	3
	2.AF2	Paint Kitchen	Paints, Primers, and Solvents	3
2.AG	2.AG	Paint Kitchen	Paints, Primers, and Solvents	3
3.GH	3.GH	Paint Kitchen	Paints, Primers, and Solvents	3
3.GI	3.GI	Paint Kitchen	Paints, Primers, and Solvents	3
3.KK	3.KK	Paint Kitchen	Paints, Primers, and Solvents	6
4.CD	4.CD	Paint Kitchen	Paints, Primers, and Solvents	3
4.CE	4.CE1	Paint Kitchen	Paints, Primers, and Solvents	3
	4.CE2	Paint Kitchen	Paints, Primers, and Solvents	3
5.BB	5.BB1	Paint Kitchen	Paints, Primers, and Solvents	3
	5.BB2	Paint Kitchen	Paints, Primers, and Solvents	3
5.DD	5.DD	Paint Kitchen	Paints, Primers, and Solvents	3
6.FF	6.FF	Paint Kitchen	Paints, Primers, and Solvents	3
6.GG	6.GG	Paint Kitchen	Paints, Primers, and Solvents	3
6.VV	6.VV	Paint Kitchen	Paints, Primers, and Solvents	3
6.WW	6.WW	Paint Kitchen	Paints, Primers, and Solvents	3

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point identified in Table KITCHEN shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit: See Facility-Wide Conditions

Authority for Requirement: Iowa DNR Construction Permits specified in Table KITCHEN2

Pollutant: Hazardous Air Pollutants (HAP)

Emission Limit: See Facility-Wide Conditions

Emission Point Characteristics

These emission points shall conform to the conditions specified in Table KITCHEN2.

Table KITCHEN2

Emission Point Number	Emission Unit Number	Construction Permit #	Stack Characteristics				Vertical Unobstructed Discharge Required?
			Height (feet)	Diameter (inches)	Exhaust Flowrate (scfm)	Exhaust Temp. (F)	
1.AP	1.AP	98-A-089-S1	41	15	3,500	Ambient	Yes
1.AQ	1.AQ1	98-A-090-S1	41	20	7,000	Ambient	Yes
	1.AQ2						
2.AF	2.AF1	98-A-073-S1	43	20	7,000	Ambient	Yes
	2.AF2						
2.AG	2.AG	98-A-074-S1	41	20	3,500	Ambient	Yes
3.GH	3.GH	98-A-007-S1	41	15	3,500	Ambient	Yes
3.GI	3.GI	98-A-008-S1	41	15	3,500	Ambient	Yes
3.KK	3.KK	99-A-684	42	24	7,000	Ambient	Yes
4.CD	4.CD	98-A-029-S1	43	15	3,500	Ambient	Yes
4.CE	4.CE1	98-A-030-S1	43	20	7,000	Ambient	Yes
	4.CE2						
5.BB	5.BB1	97-A-1028-S1	43.5	20	7,000	Ambient	Yes
	5.BB2						
5.DD	5.DD	98-A-091-S1	43.5	15	3,500	Ambient	Yes
6.FF	6.FF	98-A-156-S1	41	15	3,500	70	Yes
6.GG	6.GG	98-A-157-S1	41	15	3,500	70	Yes
6.VV	6.VV	98-A-155-S2	41	15	3,500	Ambient	Yes
6.WW	6.WW	98-A-858-S1	41	15	3,500	Ambient	Yes

Authority for Requirement: Iowa DNR Construction Permits specified in Table KITCHEN2

Periodic Monitoring Requirements

The owner/operator of each piece of equipment identified in Table KITCHEN shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table ENG

Applicable Requirements

(The following requirements apply to the emission units identified in Table ENG)

Table ENG

Emission Point Number	Associated Emission Unit Number	Emission Unit Description	Raw Material/Fuel	Rated Capacity (gal/hr)
1.AH	1.AH	Production Engine Testing Unit	Diesel/Gasoline	49.1
2.AB	2.AB	Production Engine Testing Unit	Diesel/Gasoline	51.7
2.G	2.G	Production Engine Testing Unit	Diesel/Gasoline	49.1
2.J	2.J	Production Engine Testing Unit	Diesel/Gasoline	49.1
4.J	4.J	Production Engine Testing Unit	Diesel/Gasoline	37.3
5.N	5.N	Production Engine Testing Unit	Diesel/Gasoline	51.7
5.T	5.T	Production Engine Testing Unit	Diesel/Gasoline	51.7
5.W	5.W	Production Engine Testing Unit	Diesel/Gasoline	51.7

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point identified in Table ENG shall not exceed the following specified levels.

Pollutant: Opacity
 Emission Limit: 40 %
 Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter
 Emission Limit: 0.1 gr/dscf
 Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)
 Emission Limit: 2.5 lb/MMBtu
 Authority for Requirement: 567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
 Emission Limit: See Facility-Wide Conditions

Pollutant: Volatile Organic Compounds (VOC)
 Emission Limit: See Facility-Wide Conditions

Pollutant: Hazardous Air Pollutants (HAP)
 Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of each piece of equipment identified in Table ENG shall comply with the following operational limits and requirements.

Process Throughput:

The sulfur content of any number one or number two diesel fuel combusted at this facility shall not exceed 0.5% by weight.

Authority for Requirement: 567 IAC 23.3(3)

Fuel Limitations:

1. The 12-month rolling total usage of diesel fuel in all production engine testing units shall not exceed 350,000 gallons.
2. The 12-month rolling total usage of gasoline in all production engine testing units shall not exceed 31,000 gallons.

Authority for Requirement: These limits were requested by the applicant.
567 IAC 22.108(14)

Periodic Monitoring Requirements

The owner/operator of each piece of equipment identified in Table ENG shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table ENG-CP

Applicable Requirements

(The following requirements apply to the emission units identified in Table ENG-CP)

Table ENG-CP

Emission Point Number	Associated Emission Unit Number	Emission Unit Description	Raw Material/Fuel	Rated Capacity (gal/hr)
1.AU	1.AU	Production Engine Testing Unit	Diesel/Gasoline	50.5
3.A1	3.A1	Production Engine Testing Unit	Diesel/Gasoline	54.5
3.A2	3.A2	Production Engine Testing Unit	Diesel/Gasoline	54.5
3.D1	3.D1	Production Engine Testing Unit	Diesel/Gasoline	54.5
3.D2	3.D2	Production Engine Testing Unit	Diesel/Gasoline	54.5
3.D3	3.D3	Production Engine Testing Unit	Diesel/Gasoline	54.5
3.S	3.S	Production Engine Testing Unit	Diesel/Gasoline	54.5
3.Z	3.Z	Production Engine Testing Unit	Diesel/Gasoline	54.5
4.I	4.I	Production Engine Testing Unit	Diesel/Gasoline	60.6
4.JJ	4.JJ	Production Engine Testing Unit	Diesel/Gasoline	100.9
4.S	4.S	Production Engine Testing Unit	Diesel/Gasoline	60.6
6.D	6.D	Production Engine Testing Unit	Diesel/Gasoline	52.5
6.K	6.K	Production Engine Testing Unit	Diesel/Gasoline	60.6
6.LL	6.LL	Production Engine Testing Unit	Diesel/Gasoline	60.6
6.MM	6.MM	Production Engine Testing Unit	Diesel/Gasoline	60.6
7.G	7.G	Production Engine Testing Unit	Diesel/Gasoline	50.5
7.H	7.H	Production Engine Testing Unit	Diesel/Gasoline	60.6
7.I	7.I	Production Engine Testing Unit	Diesel/Gasoline	60.6
8.B	8.B	Production Engine Testing Unit	Diesel/Gasoline	60.6
HB.A	HB.A	Production Engine Testing Unit	Diesel/Gasoline	50.5
HB.B	HB.B	Production Engine Testing Unit	Diesel/Gasoline	60.6

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point identified in Table ENG-CP2 shall not exceed the following specified levels.

Table ENG-CP2

Emission Point Number	Associated Emission Unit Number	Opacity Limit	Indicator Opacity	PM Limit (gr/dscf)	SO₂ Limit (lb/MMBtu)	Construction Permit #
1.AU	1.AU	40 %	25 % ⁽¹⁾	0.1	2.5	97-A-1107-S3
3.A1	3.A1	40 %	25 % ⁽¹⁾	0.1	2.5	97-A-1100-S2
3.A2	3.A2	40 %	25 % ⁽¹⁾	0.1	2.5	97-A-1101-S2
3.D1	3.D1	40 %	25 % ⁽¹⁾	0.1	2.5	97-A-1102-S2
3.D2	3.D2	40 %	25 % ⁽¹⁾	0.1	2.5	97-A-1103-S2
3.D3	3.D3	40 %	25 % ⁽¹⁾	0.1	2.5	97-A-1104-S2
3.S	3.S	40 %	25 % ⁽¹⁾	0.1	2.5	97-A-1105-S2
3.Z	3.Z	40 %	25 % ⁽¹⁾	0.1	2.5	97-A-1106-S2
4.I	4.I	40 %	25 % ⁽¹⁾	0.1	2.5	97-A-1108-S2
4.JJ	4.JJ	40 %	25 % ⁽²⁾	0.1	2.5	00-A-561
4.S	4.S	40 %	25 % ⁽¹⁾	0.1	2.5	97-A-1109-S2
6.D	6.D	40 %	25 % ⁽¹⁾	0.1	2.5	97-A-299-S3
6.K	6.K	40 %	25 % ⁽¹⁾	0.1	2.5	97-A-300-S4
6.LL	6.LL	40 %	25 % ⁽¹⁾	0.1	2.5	98-A-865-S2
6.MM	6.MM	40 %	25 % ⁽¹⁾	0.1	2.5	98-A-866-S2
7.G	7.G	40 %	25 % ⁽¹⁾	0.1	2.5	97-A-1112-S2
7.H	7.H	40 %	25 % ⁽¹⁾	0.1	2.5	98-A-862-S2
7.I	7.I	40 %	25 % ⁽¹⁾	0.1	2.5	98-A-863-S2
8.B	8.B	40 %	25 % ⁽¹⁾	0.1	2.5	98-A-861-S2
HB.A	HB.A	40 %	25 % ⁽¹⁾	0.1	2.5	97-A-1113-S2
HB.B	HB.B	40 %	25 % ⁽²⁾	0.1	2.5	00-A-668

Pollutant: Opacity

Emission Limit: 40 %

Indicator Opacity:..... 25 %

⁽¹⁾ If visible emissions are observed that exceed the indicator opacity other than startup, shutdown or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

⁽²⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence of the indicator opacity of 25% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permits specified in Table ENG-CP2

Pollutant: Particulate Matter
Emission Limit: 0.1 gr/dscf
Authority for Requirement: 567 IAC 23.3(2)"a"
Iowa DNR Construction Permits specified in Table ENG-CP2

Pollutant: Sulfur Dioxide (SO₂)
Emission Limit: 2.5 lb/MMBtu
Authority for Requirement: 567 IAC 23.3(3)"b"
Iowa DNR Construction Permits specified in Table ENG-CP2

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permits specified in Table ENG-CP2

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permits specified in Table ENG-CP2

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of each piece of equipment identified in Table ENG-CP shall comply with the following operational limits and requirements.

Process Throughput:

The sulfur content of any diesel fuel used in this source shall not exceed 0.4% by weight.

Authority for Requirement: Iowa DNR Construction Permits as specified in Table ENG-CP2

Fuel Limitations:

1. The 12-month rolling total usage of diesel fuel in all production engine testing units shall not exceed 350,000 gallons.
2. The 12-month rolling total usage of gasoline in all production engine testing units shall not exceed 31,000 gallons.

Authority for Requirement: These limits were requested by the applicant.
567 IAC 22.108(14)

Emission Point Characteristics

These emission points shall conform to the conditions specified in Table ENG-CP3.

Table ENG-CP3

Emission Point Number	Emission Unit Number	Construction Permit #	Stack Characteristics				
			Height (feet)	Diameter (inches)	Exhaust Flowrate (scfm)	Exhaust Temp. (F)	Vertical Unobstructed Discharge Required?
1.AU	1.AU	97-A-1107-S3	36	12	2700	759	Yes
3.A1	3.A1	97-A-1100-S2	27	12	2700	759	Yes
3.A2	3.A2	97-A-1101-S2	30	12	2700	759	Yes
3.D1	3.D1	97-A-1102-S2	37.4	12	2700	759	Yes
3.D2	3.D2	97-A-1103-S2	38.1	12	2700	759	Yes
3.D3	3.D3	97-A-1104-S2	35	12	2700	759	Yes
3.S	3.S	97-A-1105-S2	37	12	2700	759	Yes
3.Z	3.Z	97-A-1106-S2	30.8	12	2700	759	Yes
4.I	4.I	97-A-1108-S2	30	12	3000	845	Yes
4.JJ	4.JJ	00-A-561	35	12	3000	759	Yes
4.S	4.S	97-A-1109-S2	36	12	3000	845	Yes
6.D	6.D	97-A-299-S3	30.5	12	2600	759	Yes
6.K	6.K	97-A-300-S4	30.5	12	3000	845	Yes
6.LL	6.LL	98-A-865-S2	38	12	3000	845	Yes
6.MM	6.MM	98-A-866-S2	38	12	3000	845	Yes
7.G	7.G	97-A-1112-S2	35	12	2500	759	Yes
7.H	7.H	98-A-862-S2	37	12	3000	845	Yes
7.I	7.I	98-A-863-S2	38	12	3000	845	Yes
8.B	8.B	98-A-861-S2	27	12	3000	845	Yes
HB.A	HB.A	97-A-1113-S2	38	12	2500	759	Yes
HB.B	HB.B	00-A-668	43	12	3000	845	Yes

Authority for Requirement: Iowa DNR Construction Permits specified in Table ENG-CP3

Periodic Monitoring Requirements

The owner/operator of each piece of equipment identified in Table ENG-CP shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Numbers: See Table HEAT

Applicable Requirements

(The following requirements apply to each emission unit identified in Table HEAT)

Table HEAT

(Natural Gas or Propane Fired Units)

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description	Fuel	Rated Capacity (MMBtu/hr)
1.AA	1.AA	Non-Production Heating Unit	LPG or NG	0.35
1.AC	1.AC	Non-Production Heating Unit	LPG or NG	0.35
1.AD	1.AD	Non-Production Heating Unit	LPG or NG	0.18
1.AF	1.AF	Non-Production Heating Unit	LPG or NG	1.95
1.AV	1.AV	Non-Production Heating Unit	LPG or NG	0.065
1.AW	1.AW	Non-Production Heating Unit	LPG or NG	0.065
1.AX	1.AX	Non-Production Heating Unit	LPG or NG	0.065
1.AY	1.AY	Non-Production Heating Unit	LPG or NG	0.065
1.AZ	1.AZ	Non-Production Heating Unit	LPG or NG	0.065
1.BA	1.BA	Non-Production Heating Unit	LPG or NG	0.065
1.BC	1.BC	Non-Production Heating Unit	LPG or NG	0.25
1.BD	1.BD	Non-Production Heating Unit	LPG or NG	0.25
1.C	1.C	Non-Production Heating Unit	LPG or NG	2.5
1.D	1.D	Water Heater	LPG or NG	0.28
1.EE	1.EE	Phos Pro Water Heater	LPG or NG	0.28
1.FF	1.FF	Non-Production Heating Unit	LPG or NG	0.25
1.GG	1.GG	Non-Production Heating Unit	LPG or NG	0.25
1.O	1.O	Non-Production Heating Unit	LPG or NG	2.0
1.U	1.U	Water Heater	LPG or NG	0.528
1.Y	1.Y	Non-Production Heating Unit	LPG or NG	8.0
2.AD1	2.AD1	Make Up Air Unit	LPG or NG	3.23
2.AD2	2.AD2	Make Up Air Unit	LPG or NG	3.23
2.AE	2.AE	Make Up Air Unit	LPG or NG	2.17
2.AH	2.AH	Phos Pro Water Heater	LPG or NG	0.55
2.AJ	2.AJ	Paint Booth Air Intake	LPG or NG	3.28
2.B	2.B	Non-Production Heating Unit	LPG or NG	0.35
2.P	2.P	Non-Production Heating Unit	LPG or NG	6.33
2.Q	2.Q	Water Heater	LPG or NG	0.528
2.V1	2.V1	Non-Production Heating Unit	LPG or NG	0.18
2.V2	2.V2	Non-Production Heating Unit	LPG or NG	0.18
2.X	2.X	Non-Production Heating Unit	LPG or NG	0.10
2.Y1	2.Y1	Non-Production Heating Unit	LPG or NG	0.15
2.Y2	2.Y2	Non-Production Heating Unit	LPG or NG	0.15
3.AA	3.AA	Parts Oven	NG	0.35

Table HEAT (continued)
(Natural Gas or Propane Fired Units)

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description	Fuel	Rated Capacity (MMBtu/hr)
3.AD	3.AD	Phos Pro Water Heater	NG	0.55
3.AF	3.AF	Non-Production Heating Unit	NG	0.065
3.AG	3.AG	Non-Production Heating Unit	NG	0.065
3.BB	3.BB	Non-Production Heating Unit	NG	1.3
3.C	3.C	Non-Production Heating Unit	NG	2.0
3.GG	3.GG	Non-Production Heating Unit	NG	0.05
3.GK1	3.GK1	Non-Production Heating Unit	NG	0.05
3.GK2	3.GK2	Non-Production Heating Unit	NG	0.05
3.LL	3.LL	Make Up Air Unit	NG	2.33
3.M	3.M	Water Heater	NG	0.528
3.P	3.P	Non-Production Heating Unit	NG	6.25
3.PP	3.PP	Make Up Air Unit	NG	2.33
3.RR	3.RR	Make Up Air Unit	NG	3.04
3.SS	3.SS	Make Up Air Unit	NG	3.04
3.T	3.T	Non-Production Heating Unit	NG	0.18
3.TT	3.TT	Make Up Air Unit	NG	3.65
3.UU	3.UU	Make Up Air Unit	NG	3.65
3.VV	3.VV	Make Up Air Unit	NG	3.65
3.W	3.W	Non-Production Heating Unit	NG	1.5
3.WW	3.WW	Make Up Air Unit	NG	2.33
3.X1	3.X1	Non-Production Heating Unit	NG	0.13
3.X2	3.X2	Non-Production Heating Unit	NG	0.13
3.Y1	3.Y1	Non-Production Heating Unit	NG	4.86
4.A1	4.A1	Non-Production Heating Unit	NG	2.0
4.A2	4.A2	Non-Production Heating Unit	NG	2.0
4.A3	4.A3	Non-Production Heating Unit	NG	2.0
4.AA	4.AA	Non-Production Heating Unit	NG	2.0
4.AC	4.AC	Non-Production Heating Unit	NG	0.07
4.AD	4.AD	Non-Production Heating Unit	NG	0.07
4.AE	4.AE	Non-Production Heating Unit	NG	0.21
4.AF	4.AF	Non-Production Heating Unit	NG	0.21
4.BB	4.BB	Non-Production Heating Unit	NG	2.0
4.D	4.D	Water Heater	NG	0.528
4.H2	4.H2	Non-Production Heating Unit	NG	5.35
4.K1	4.K1	Non-Production Heating Unit	NG	5.35
4.KK	4.KK	Wash Bay Heater	NG	0.28
4.L	4.L	Non-Production Heating Unit	NG	0.24
4.R	4.R	Non-Production Heating Unit	NG	3.24
4.T	4.T	Non-Production Heating Unit	NG	0.09
5.A	5.A	Non-Production Heating Unit	NG	3.58

Table HEAT (continued)
(Natural Gas or Propane Fired Units)

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description	Fuel	Rated Capacity (MMBtu/hr)
5.AA	5.AA	Non-Production Heating Unit	NG	0.25
5.AJ1	5.AJ1	Make Up Air Unit	NG	5.859
5.AJ2	5.AJ2	Make Up Air Unit	NG	5.859
5.AJ3	5.AJ3	Make Up Air Unit	NG	5.859
5.AJ4	5.AJ4	Make Up Air Unit	NG	5.859
5.AJ5	5.AJ5	Make Up Air Unit	NG	5.859
5.AJ6	5.AJ6	Make Up Air Unit	NG	5.859
5.AJ7	5.AJ7	Make Up Air Unit	NG	5.859
5.AJ8	5.AJ8	Make Up Air Unit	NG	5.859
5.B1	5.B1	Non-Production Heating Unit	NG	2.0
5.B2	5.B2	Non-Production Heating Unit	NG	2.0
5.E	5.E	Water Heater	NG	0.528
5.EE	5.EE	Non-Production Heating Unit	NG	0.065
5.FF	5.FF	Non-Production Heating Unit	NG	0.065
5.GG	5.GG	Non-Production Heating Unit	NG	0.065
5.H	5.H	Non-Production Heating Unit	NG	6.33
5.HH	5.HH	Non-Production Heating Unit	NG	0.065
5.II	5.II	Non-Production Heating Unit	NG	0.065
5.JJ	5.JJ	Non-Production Heating Unit	NG	0.065
5.K	5.K	Non-Production Heating Unit	NG	2.35
5.M	5.M	Non-Production Heating Unit	NG	0.76
5.O	5.O	Non-Production Heating Unit	NG	2.50
5.P	5.P	Make Up Air Unit	NG	1.65
5.R	5.R	Water Heater	NG	0.528
6.AA1	6.AA1	Non-Production Heating Unit	NG	0.08
6.AA2	6.AA2	Non-Production Heating Unit	NG	0.08
6.AA3	6.AA3	Non-Production Heating Unit	NG	0.08
6.AA4	6.AA4	Non-Production Heating Unit	NG	0.08
6.AB	6.AB	Non-Production Heating Unit	NG	2.75
6.AC	6.AC	Non-Production Heating Unit	NG	2.75
6.AD	6.AD	Non-Production Heating Unit	NG	2.75
6.AE	6.AE	Non-Production Heating Unit	NG	2.75
6.AF	6.AF	Non-Production Heating Unit	NG	2.75
6.AG	6.AG	Non-Production Heating Unit	NG	2.75
6.C	6.C	Non-Production Heating Unit	NG	7.43
6.JJ	6.JJ	Paint Booth Air Intake	NG	2.16
6.KK	6.KK	Paint Booth Air Intake	NG	2.16
6.L	6.L	Non-Production Heating Unit	NG	0.11
6.Q	6.Q	Water Heater	NG	0.528
6.R	6.R	Non-Production Heating Unit	NG	4.68

Table HEAT (continued)
(Natural Gas or Propane Fired Units)

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description	Fuel	Rated Capacity (MMBtu/hr)
6.T	6.T	Non-Production Heating Unit	NG	0.12
7.B1	7.B1	Non-Production Heating Unit	NG	0.16
7.B2	7.B2	Non-Production Heating Unit	NG	1.0
7.B3	7.B3	Non-Production Heating Unit	NG	1.0
7.B4	7.B4	Non-Production Heating Unit	NG	1.0
7.D	7.D	Non-Production Heating Unit	NG	7.43
7.K	7.K	Non-Production Heating Unit	NG	0.1
7.L	7.L	Non-Production Heating Unit	NG	0.135
7.M	7.M	Non-Production Heating Unit	NG	0.08
7.N	7.N	Non-Production Heating Unit	NG	0.08
7.O	7.O	Non-Production Heating Unit	NG	0.08
7.P	7.P	Non-Production Heating Unit	NG	0.1
7.Q	7.Q	Non-Production Heating Unit	NG	0.1
7.S	7.S	Non-Production Heating Unit	NG	2.75
7.T	7.T	Non-Production Heating Unit	NG	7.50
7.T1	7.T1	Non-Production Heating Unit	NG	7.50
7.U	7.U	Non-Production Heating Unit	NG	0.054
7.V	7.V	Non-Production Heating Unit	NG	0.054
7.W	7.W	Non-Production Heating Unit	NG	0.065
7.X	7.X	Non-Production Heating Unit	NG	0.065
8.A1	8.A1	Non-Production Heating Unit	NG	0.4
8.A2	8.A2	Non-Production Heating Unit	NG	0.4
8.A3	8.A3	Non-Production Heating Unit	NG	0.4
8.A4	8.A4	Non-Production Heating Unit	NG	0.4
8.A5	8.A5	Non-Production Heating Unit	NG	0.4
8.A6	8.A6	Non-Production Heating Unit	NG	0.4
8.A7	8.A7	Non-Production Heating Unit	NG	0.4
8.A8	8.A8	Non-Production Heating Unit	NG	0.4
8.A9	8.A9	Non-Production Heating Unit	NG	0.4
8.A10	8.A10	Non-Production Heating Unit	NG	0.4
8.A11	8.A11	Non-Production Heating Unit	NG	0.4
8.A12	8.A12	Non-Production Heating Unit	NG	0.4
HB.J	HB.J	Non-Production Heating Unit	NG	0.075
HB.N	HB.N	Non-Production Heating Unit	NG	0.075
P.C1	P.C1	Non-Production Heating Unit	NG	0.4
P.C2	P.C2	Non-Production Heating Unit	NG	0.4
P.D1	P.D1	Non-Production Heating Unit	NG	0.4
P.D2	P.D2	Non-Production Heating Unit	NG	0.4
P.D3	P.D3	Non-Production Heating Unit	NG	0.4
P.E	P.E	Non-Production Heating Unit	NG	0.4

Table HEAT (continued)
 (Natural Gas or Propane Fired Units)

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description	Fuel	Rated Capacity (MMBtu/hr)
PB.A	PB.A	Non-Production Heating Unit	NG	0.4
W.B	W.B	Hotsey Washer	NG	0.657

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point identified in Table HEAT shall not exceed the following specified levels.

Pollutant: Opacity
 Emission Limit: 40 %
 Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter
 Emission Limit: 15.3 lb/MMCF of Propane or Natural Gas
 Authority for Requirement: Part 7a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
 District Court, Marion County, Law No. LACV087889

Pollutant: Particulate Matter
 Emission Limit: 0.8 lb/MMBtu
 Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
 Emission Limit: 500 ppmv
 Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
 Emission Limit: See Facility-Wide Conditions

Pollutant: Volatile Organic Compounds (VOC)
 Emission Limit: See Facility-Wide Conditions

Pollutant: Hazardous Air Pollutants (HAP)
 Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of each piece of equipment identified in Table HEAT shall comply with the following operational limits and requirements.

Process throughput:

The sulfur content of natural gas or LPG combusted by this source is not to exceed 123 ppm by weight.

Reporting & Recordkeeping: See Facility-Wide Operational Limits

Authority for Requirement: Part 7b. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Periodic Monitoring Requirements

The owner/operator of each piece of equipment identified in Table HEAT shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table HEAT2

Applicable Requirements

(The following requirements apply to each emission unit identified in Table HEAT2)

Table HEAT2
(Waste Oil Fired Units)

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description	Fuel	Rated Capacity (gal/hr)
P.A1	P.A1	Non-Production Heating Unit	Waste Oil	3.28
P.A2	P.A2	Non-Production Heating Unit	Waste Oil	3.28
Q.A	Q.A	Non-Production Heating Unit	Waste Oil	3.28
WW.A	WW.A	Non-Production Heating Unit	Waste Oil	3.28

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point described in Table HEAT2 shall not exceed the following specified levels.

Pollutant: Opacity
 Emission Limit: 40 %
 Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter
 Emission Limit: 0.8 lb/MMBtu
 Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO₂)
 Emission Limit: 2.5 lb/MMBtu
 Authority for Requirement: 567 IAC 23.3(3)"b"

Pollutant: Nitrogen Oxides (NO_x)
 Emission Limit: See Facility-Wide Conditions

Pollutant: Volatile Organic Compounds (VOC)
 Emission Limit: See Facility-Wide Conditions

Pollutant: Hazardous Air Pollutants (HAP)
 Emission Limit: See Facility-Wide Conditions

Periodic Monitoring Requirements

The owner/operator of each piece of equipment identified in Table HEAT2 shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: See Table TANK

Applicable Requirements

(The following requirements apply to the emission units identified in Table TANK)

Table TANK

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description	Material Stored	Capacity (gallons per tank)
DSL TANK2	DSL TANK2	Storage Tank	Diesel Fuel	1,000
DSL TANK4	DSL TANK4	Storage Tank	Diesel Fuel	1,000
DSL TANK8	DSL TANK8	Storage Tank	Diesel Fuel	1,000
DSL TANK9	DSL TANK9	Storage Tank	Diesel Fuel	1,000
GAS TANK3	GAS TANK3	Storage Tank	Gasoline	1,000
GAS TANK7	GAS TANK7	Storage Tank	Gasoline	1,000
OIL TANK	OIL TANK	Storage Tank	Used Oil	5,000
PROPANE	PROPANE	Three (3) Storage Tanks	Propane	6,000
PROPYLENE	PROPYLENE	Three (3) Storage Tanks	Propylene	1,000

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point described in Table TANK shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
 Emission Limit: See Facility-Wide Conditions

Pollutant: Hazardous Air Pollutants (HAP)
 Emission Limit: See Facility-Wide Conditions

Periodic Monitoring Requirements

The owner/operator of each piece of equipment identified in Table TANK shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1.T

Associated Equipment

Associated Emission Unit ID Number: 1.T
Emissions Control Equipment ID Number: 1.T
Emissions Control Equipment Description: Baghouse

Applicable Requirements

Emission Unit vented through this Emission Point: 1.T
Emission Unit Description: Wheelabrator Shot Blast Booth
Raw Material/Fuel: Abrasive Shot
Rated Capacity: 40 lb/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter
Emission Limit: 0.05 gr/dscf
Authority for Requirement: 567 IAC 23.4(6)
Iowa DNR Construction Permit 79-A-108

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: W.E

Associated Equipment

Associated Emission Unit ID Number: W.E

Applicable Requirements

Emission Unit vented through this Emission Point: W.E
Emission Unit Description: Paint Hook Burn-Off Oven
Raw Material/Fuel: Natural Gas
Rated Capacity: 0.78 MMBtu/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %⁽¹⁾
Authority for Requirement: 567 IAC 23.4(12)"b"
Iowa DNR Construction Permit 98-A-072-S1

⁽¹⁾ No person shall allow, cause or permit the operation of an incinerator in a manner such that it produces visible air contaminants in excess of 40 percent opacity; except that visible air contaminants in excess of 60 percent opacity may be emitted for a period or period aggregating not more than 3 minutes in any 60-minute period during operation breakdown or during the cleaning of air pollution control equipment.

Pollutant: Particulate Matter
Emission Limit: 0.35 gr/dscf⁽¹⁾
⁽¹⁾ Adjusted to 12% CO₂
Authority for Requirement: 567 IAC 23.4(12)"a"
Iowa DNR Construction Permit 98-A-072-S1

Pollutant: Sulfur Dioxide (SO₂)
Emission Limit: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-072-S1

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 98-A-072-S1

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Compliance Testing Requirements

PM..... Iowa Compliance Sampling Manual*

The owner shall verify compliance with the emission limitations contained in Construction Permit 98-A-072-S1 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the startup date of the proposed equipment. The test shall be conducted with the equipment operating in a manner representative of full rated capacity. Failure to test at this maximum may be cause to limit the source to operating at the level at which the compliance tests were conducted.

The owner shall furnish the DNR the following written notifications:

1. The date of intended startup at least ten (10) days before the equipment or control equipment involved is placed into operation.
2. The actual date of startup postmarked within fifteen (15) days following the start of operation.

Authority for Requirement: Iowa DNR Construction Permit 98-A-072-S1

**The required stack testing was performed on November 15, 1999.*

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Supplemental Environmental Project (SEP):

Equipment parameters:

The emission unit associated with this emission point will consist of a high temperature, natural gas fired oven for the destruction of paint built up on the hooks that transport parts to the paint lines at the facility. This will include a 36 foot by 16 foot insulated addition to the existing waste management building to house one Blu Surf Model No. 6506 Wash Booth Unit and one Model No. 5505 Burnoff Oven together with the necessary electrical system for the equipment, gas lines for the oven, drain lines for the wash water discharge, multilevel footings, foundation, and concrete flooring to support and allow for operation of the oven. The hook burnoff oven system will consist of one batch burnoff oven, Model No. 5506 with a top mount after burner.

The oven will include a primary and secondary water suppression system to prevent overheating during oven burning cycles. A modulating gas valve system will be supplied for the primary burner to maintain consistent, efficient thermal operating temperatures, operating at an approximate 540,000 Btu per hour level with a potential for 780,000 Btu per hour maximum. Each time the oven is started, the water suppression system will automatically turn on for approximately 30 seconds. A roller track will be installed in the floor to transport carts from the oven to the wash booth unit. The wash unit will be supplied with a power washer operating at 2 gallons per minute at 1,000 pounds per square inch pressure for cleaning the ash from the hooks, carts and racks after burning.

Authority for Requirement: Paragraph 3a. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Operational term: This SEP will be maintained for the life of this permit.

Authority for Requirement: Paragraph 3i. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Reporting & Record keeping:

Vermeer shall submit to the DNR an annual performance report covering the required period of use and maintenance of this SEP documenting the actual use and maintenance of this SEP. The reports shall be submitted on or before March 1, for the preceding calendar year, commencing on March 1, 1999.

Authority for Requirement: Paragraph 3j. of State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542
District Court, Marion County, Law No. LACV087889

Process throughput:

- A. The quantity of paint incinerated in this source shall not exceed 27.5 pounds per hour.
- B. This source shall be fired by natural gas or propane only.

Reporting & Recordkeeping: See Facility-Wide Conditions and include:

The amount of paint incinerated in this unit, in pounds per hour.

Authority for Requirement: Iowa DNR Construction Permit 98-A-072-S1

Emission Point Characteristics

This emission point shall conform to the following conditions.

Stack Height (feet, from the ground): 35.2

Stack Diameter (inches): 6

Stack Exhaust Flow Rate (acfm): 1,578

Stack Temperature (°F): 1,322

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 98-A-072-S1

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: W.F1

Associated Equipment

Associated Emission Unit ID Number: W.F

Applicable Requirements

Emission Unit vented through this Emission Point: W.F
Emission Unit Description: Waste Solvent Still
Raw Material/Fuel: Recovered Paints, etc.
Rated Capacity: 4.58 gallons/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Reporting & Record keeping: See Facility-Wide Conditions and include:
A monthly and a twelve (12) month rolling total of the amount of solvent recovered, in gallons.
Authority for Requirement: Iowa DNR Construction Permit 99-A-340

Emission Point Characteristics

This emission point shall conform to the following conditions.

Stack Height (feet, from the ground): 10
Stack Diameter (inches): 2
Stack Exhaust Flow Rate: Natural draft
Stack Temperature (°F): Ambient
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 99-A-340

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: W.F2

Associated Equipment

Associated Emission Unit ID Number: W.F

Applicable Requirements

Emission Unit vented through this Emission Point: W.F
Emission Unit Description: Waste Solvent Still
Raw Material/Fuel: Recovered Paints, etc.
Rated Capacity: 4.58 gallons/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Reporting & Record keeping: See Facility-Wide Conditions and include:
A monthly and a twelve (12) month rolling total of the amount of solvent recovered, in gallons.
Authority for Requirement: Iowa DNR Construction Permit 99-A-341

Emission Point Characteristics

This emission point shall conform to the following conditions.

Stack Height (feet, from the ground): 10
Stack Diameter (inches): 2
Stack Exhaust Flow Rate: Natural draft
Stack Temperature (°F): Ambient
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 99-A-341

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: W.H

Associated Equipment

Associated Emission Unit ID Number: W.H

Applicable Requirements

Emission Unit vented through this Emission Point: W.H
Emission Unit Description: Aerosol Can Crusher
Raw Material/Fuel: Aerosol Cans
Rated Capacity: 120 cans/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 99-A-691

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Emission Point Characteristics

This emission point shall conform to the following conditions.

Stack Height (feet, from the ground): 35
Stack Diameter (inches): 12
Stack Exhaust Flow Rate (scfm): 3,500
Stack Temperature (°F): Ambient
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permit 99-A-691

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: W.I

Associated Equipment

Associated Emission Unit ID Number: W.I

Applicable Requirements

Emission Unit vented through this Emission Point: W.I
Emission Unit Description: Paint Hook Burn-Off Oven
Raw Material/Fuel: Natural Gas
Rated Capacity: 2.0 MMBtu/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Opacity
Emission Limit: 40 %⁽¹⁾
Authority for Requirement: 567 IAC 23.4(12)"b"
Iowa DNR Construction Permit 00-A-627

⁽¹⁾ No person shall allow, cause or permit the operation of an incinerator in a manner such that it produces visible air contaminants in excess of 40 percent opacity; except that visible air contaminants in excess of 60 percent opacity may be emitted for a period or period aggregating not more than 3 minutes in any 60-minute period during operation breakdown or during the cleaning of air pollution control equipment.

Pollutant: Particulate Matter
Emission Limit: 0.35 gr/dscf⁽¹⁾
⁽¹⁾ Adjusted to 12% CO₂
Authority for Requirement: 567 IAC 23.4(12)"a"
Iowa DNR Construction Permit 00-A-627

Pollutant: Sulfur Dioxide (SO₂)
Emission Limit: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction 00-A-627

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit: See Facility-Wide Conditions
Authority for Requirement: Iowa DNR Construction Permit 00-A-627

Pollutant: Hazardous Air Pollutants (HAP)
Emission Limit: See Facility-Wide Conditions

Compliance Testing Requirements

PM..... Iowa Compliance Sampling Manual*

The owner shall verify compliance with the emission limitations contained in Construction Permit 00-A-627 within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the startup date of the proposed equipment. The test shall be conducted with the equipment operating in a manner representative of full rated capacity. Failure to test at this maximum may be cause to limit the source to operating at the level at which the compliance tests were conducted.

The owner shall furnish the DNR the following written notifications:

1. The date of intended startup at least ten (10) days before the equipment or control equipment involved is placed into operation.
2. The actual date of startup postmarked within fifteen (15) days following the start of operation.

Authority for Requirement: Iowa DNR Construction Permit 00-A-627

**The required stack testing was performed on October 17, 2000.*

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the following operational limits and requirements.

Process throughput:

- A. This burn-off oven shall be fired by natural gas or propane only.
- B. The afterburner shall be operated whenever this unit is combusting waste.
- C. The quantity of paint incinerated in this unit shall not exceed 70 pounds per hour.

Reporting & Recordkeeping: See Facility-Wide Conditions and include:

The amount of paint incinerated in this unit, in pounds per hour.

Authority for Requirement: Iowa DNR Construction Permit 00-A-627

Emission Point Characteristics

This emission point shall conform to the following conditions.

Stack Height (feet, from the ground): 35

Stack Opening (inches, diameter): 18

Exhaust Flow Rate (scfm): 952

Exhaust Temperature (°F): 1,322

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 00-A-627

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: F.SAND

Associated Equipment

Associated Emission Unit ID Number: F.SAND

Applicable Requirements

Emission Unit vented through this Emission Point: F.SAND
Emission Unit Description: Sand Blasting Unit
Raw Material/Fuel: Silica Sand
Rated Capacity: 600 lb Sand/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: F.SODA

Associated Equipment

Associated Emission Unit ID Number: F.SODA

Applicable Requirements

Emission Unit vented through this Emission Point: F.SODA
Emission Unit Description: Soda Blasting Unit
Raw Material/Fuel: Abrasive Soda
Rated Capacity: 120 lb Soda/hr

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the following specified levels.

Pollutant: Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the following periodic monitoring requirements.

Agency Approved Operation & Maintenance Plan Required? Yes No

Facility Maintained Operation & Maintenance Plan Required? Yes No

Authority for Requirement: 567 IAC 22.108(3)"b"

IV. General Conditions

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code chapter 22.

G1. Duty to Comply

1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. *567 IAC 22.108(9)"a"*
2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. *567 IAC 22.105 (2)"h"3*
3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. *567 IAC 22.108 (1)"b"*
4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. *567 IAC 22.108 (14)*
5. It shall not be a defense for a permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. *567 IAC 22.108 (9)"b"*

G2. Permit Expiration

1. Except as provided in 567 IAC 22.104, the expiration of this permit terminates the permittee's right to operate unless a timely and complete application has been submitted for renewal. Any testing required for renewal shall be completed before the application is submitted. *567 IAC 22.116(2)*
2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall present or mail the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, 7900 Hickman Rd, Suite #1, Urbandale, Iowa 50322, four or more copies of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. The definition of a complete application is as indicated in 567 IAC 22.105(2). *567 IAC 22.105*

G3. Certification Requirement for Title V Related Documents

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. *567 IAC 22.107 (4)*

G4. Annual Compliance Certification

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides

for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. *567 IAC 22.108 (15)"e"*

G5. Semi-Annual Monitoring Report

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 22.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. *567 IAC 22.108 (5)*

G6. Annual Fee

1. The permittee is required under subrule 567 IAC 22.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
3. The following forms shall be submitted annually by March 31 documenting actual emissions for the previous calendar year.
 - a. Form 1.0 "Facility Identification";
 - b. Form 4.0 "Emissions unit-actual operations and emissions" for each emission unit;
 - c. Form 5.0 "Title V annual emissions summary/fee"; and
 - d. Part 3 "Application certification."
4. The fee shall be submitted annually by July 1. The fee shall be submitted with the following forms:
 - a. Form 1.0 "Facility Identification";
 - b. Form 5.0 "Title V annual emissions summary/fee";
 - c. Part 3 "Application certification."
5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.
7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.
8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 22.115(1)"d".

G7. Inspection of Premises, Records, Equipment, Methods and Discharges

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. *567 IAC 22.108 (15)"b"*

G8. Duty to Provide Information

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. *567 IAC 22.108 (9)"e"*

G9. General Maintenance and Repair Duties

The owner or operator of any air emission source or control equipment shall:

1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
2. Remedy any cause of excess emissions in an expeditious manner.
3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. *567 IAC 24.2(1)*

G10. Recordkeeping Requirements for Compliance Monitoring

1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:

- a. The date, place and time of sampling or measurements
- b. The date the analyses were performed.
- c. The company or entity that performed the analyses.
- d. The analytical techniques or methods used.
- e. The results of such analyses; and
- f. The operating conditions as existing at the time of sampling or measurement.
- g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)

2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.

3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:
- a. Comply with all terms and conditions of this permit specific to each alternative scenario.
 - b. Maintain a log at the permitted facility of the scenario under which it is operating.
 - c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. *567 IAC 22.108(4), 567 IAC 22.108(12)*

G11. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. *567 IAC 22.108(6)*

G12. Hazardous Release

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 281-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in *567 IAC 131.2(2), 567 IAC Chapter 131-State Only*

G13. Excess Emissions and Excess Emissions Reporting Requirements

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control measures. Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

2. Excess Emissions Reporting

a. **Oral Reporting of Excess Emissions.** An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An oral report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1)) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable visible emission standard by more than 10 percent opacity. The oral report may be made in person or by telephone and shall include as a minimum the following:

- i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and expected duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps being taken to remedy the excess emission.
- vi. The steps being taken to limit the excess emission in the interim period.

b. **Written Reporting of Excess Emissions.** A written report of an incident of excess emission shall be submitted as a follow-up to all required oral reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:

- i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.
- vi. The steps that were taken to limit the excess emission.
- vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. 567 IAC 24.1(1)-567 IAC 24.1(4)

3. **Emergency Defense for Excess Emissions.** For the purposes of this permit, an “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The facility at the time was being properly operated;
- c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and
- d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. *567 IAC 22.108(16)*

G14. Permit Deviation Reporting Requirements

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G12 and G13). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). *567 IAC 22.108(5)"b"*

G15. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. *567 IAC 23.1(2), 567 IAC 23.1(3), 567 IAC 23.1(4)*

G16. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification

1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:
 - a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 22.
 - b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);
 - c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
 - d. The changes are not subject to any requirement under Title IV of the Act.
 - e. The changes comply with all applicable requirements.
 - f. For such a change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:

- i. A brief description of the change within the permitted facility,
 - ii. The date on which the change will occur,
 - iii. Any change in emission as a result of that change,
 - iv. The pollutants emitted subject to the emissions trade
 - v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.
 - vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
 - vii. Any permit term or condition no longer applicable as a result of the change.
- 567 IAC 22.110(1)*

2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. *567 IAC 22.110(2)*

3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 22.110(1). *567 IAC 22.110(3)*

4. The permit shield provided in subrule 22.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. *567 IAC 22.110(4)*

5. Aggregate Insignificant Emissions. The permittee shall not construct, establish or operate any new insignificant activities or modify any existing insignificant activities in such a way that the emissions from these activities no longer meet the criteria of aggregate insignificant emissions. If the aggregate insignificant emissions are expected to be exceeded, the permittee shall submit the appropriate permit modification and receive approval prior to making any change. *567 IAC 22.103(2)*

6. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. *567 IAC 22.108(11)*

G17. Duty to Modify a Title V Permit

1. Administrative Amendment.

a. An administrative permit amendment is a permit revision that is required to do any of the following:

- i. Correct typographical errors
- ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source;
- iii. Require more frequent monitoring or reporting by the permittee; or
- iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility,

coverage and liability between the current and new permittee has been submitted to the director.

b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.

c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.

2. Minor Permit Modification.

a. Minor permit modification procedures may be used only for those permit modifications that do any of the following:

i. Do not violate any applicable requirements

ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit.

iii. Do not require or change a case by case determination of an emission limitation or other standard, or increment analysis.

iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act.;

v. Are not modifications under any provision of Title I of the Act; and

vi. Are not required to be processed as significant modification.

b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:

i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs.

ii. The permittee's suggested draft permit

iii. Certification by a responsible official, pursuant to 567 IAC 22.107(4), that the proposed modification meets the criteria for use of a minor permit modification procedures and a request that such procedures be used; and

iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 22.107(7).

c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 22.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, existing permit term terms and conditions it seeks to modify may subject the facility to enforcement action.

3. Significant Permit Modification. Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 22, including those for applications, public participation, review by affected states, and review by the administrator, and those requirements that apply to Title V issuance and renewal. *567 IAC 22.111-567 IAC 22.113* The permittee shall submit an application for a significant permit modification at least 6 months prior to the date of the proposed modification. *567 IAC 22.105(1)a(4)*

G18. Duty to Obtain Construction Permits

Unless exempted under 567 IAC 22.1(2), the permittee must not construct, install, reconstruct, or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, conditional permit, or permit pursuant to 567 IAC 22.8, or permits required pursuant to 567 IAC 22.4 and 567 IAC 22.5. Such permits shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source. *567 IAC 22.1(1)*

G19. Asbestos

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when conducting any renovation or demolition activities at the facility. *567 IAC 23.1(3)"a", and 567 IAC 23.2*

G20. Open Burning

The permittee is prohibited from conducting open burning, except as may be allowed by 567 IAC 23.2. *567 IAC 23.2 except 23.2(3)"h"; 567 IAC 23.2(3)"h" - State Only*

G21. Acid Rain (Title IV) Emissions Allowances

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. *567 IAC 22.108(7)*

G22. Stratospheric Ozone and Climate Protection (Title VI) Requirements

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.
 - b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
 - c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.

2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
 - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.
3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,
5. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *40 CFR part 82*

G23. Permit Reopenings

1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. *567 IAC 22.108(9)"c"*
2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as practicable, but not later than 18 months after the promulgation of such standards and regulations.
 - a. Reopening and revision on this ground is not required if the permit has a remaining term of less than three years;
 - b. Reopening and revision on this ground is not required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to June 25, 1993.

c. Reopening and revision on this ground is not required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. *567 IAC 22.108(17)"a"*, *567 IAC 22.108(17)"b"*

3. A permit shall be reopened and revised under any of the following circumstances:
 - a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to June 25, 1993, provided that the reopening may be stayed pending judicial review of that determination;
 - b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Title V permit;
 - c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.
 - d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
 - e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements. *567 IAC 22.114(1)*
4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. *567 IAC 22.114(2)*

G24. Permit Shield

Compliance with the conditions of this permit shall be deemed compliance with the applicable requirements included in this permit as of the date of permit issuance.

This permit shield shall not alter or affect the following:

1. The provisions of section 303 of the Act (emergency orders), including the authority of the administrator under that section;
2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Act;
4. The ability of the department or the administrator to obtain information from the facility pursuant to section 114 of the Act. *567 IAC 22.108 (18)*

G25. Severability

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. *567 IAC 22.108 (8)*

G26. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. *567 IAC 22.108 (9)"d"*

G27. Transferability

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought to determine transferability of the permit. *567 IAC 22.111 (1)"d"*

G28. Disclaimer

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. *567 IAC 22.3(3)"c"*

G29. Notification and Reporting Requirements for Stack Tests or Monitor Certification

The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with an applicable requirement. For the department to consider test results a valid demonstration of compliance with applicable rules or a permit condition, such notice shall be given. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. Unless specifically waived by the department's stack test contact, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. The department may accept a testing protocol in lieu of a pretest meeting. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator
Iowa DNR, Air Quality Bureau
7900 Hickman Road, Suite #1
Urbandale, IA 50322
(515) 242-6001

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program.

567 IAC 25.1(7)"a", 567 IAC 25.1(9)

G30. Prevention of Air Pollution Emergency Episodes

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons.
567 IAC 26.1(1)

G31. Contacts List

The current address and phone number for reports and notifications to the EPA administrator is:

Chief of Air Permits
EPA Region 7
Air Permits and Compliance Branch
901 N. 5th Street
Kansas City, KS 66101
(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite #1
Urbandale, IA 50322
(515) 242-5100

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

Field Office 1

909 West Main – Suite 4
Manchester, IA 52057
(319) 927-2640

Field Office 2

P.O. Box 1443
2300-15th St., SW
Mason City, IA 50401
(641) 424-4073

Field Office 3

1900 N. Grand Ave.
Spencer, IA 51301
(712) 262-4177

Field Office 4

1401 Sunnyside Lane
Atlantic, IA 50022
(712) 243-1934

Field Office 5

401 SW 7th Street, Suite I
Des Moines, IA 50309
(515) 725-0268

Field Office 6

1004 W. Madison
Washington, IA 52353
(319) 653-2135

Polk County Public Health Dept.

Air Quality Division
5895 NE 14th St.
Des Moines, IA 50313
(515) 286-3351

Linn County Public Health Dept.

Air Pollution Control Division
501 13th St., NW
Cedar Rapids, IA 52405
(319) 892-6000

V. Appendix A

State of Iowa, ex rel., Iowa DNR vs. Vermeer Manufacturing Company, 99AG23542, District Court, Marion County, Law No. LACV087889 (attached)

VI. Appendix B: DNR Air Quality Policy 3-b-08, Opacity Limits



IOWA EASY AIR

ELECTRONIC PERMIT APPLICATION SYSTEM

What? Introducing Iowa EASY Air (Environmental Application System), a convenient, efficient way to submit air quality permit applications. Recognizing the need to reduce industry’s time and costs involved in applying for air quality permits, the Department of Natural Resources (DNR) entered into a contract with enfoTech & Consulting, Inc. to develop a modern electronic permit application system. The new system will allow applicants to quickly submit both air quality construction permit and Title V operating permit applications. The new online system will be customized for air quality programs, adaptable to changing business needs and scalable for use by other DNR programs.

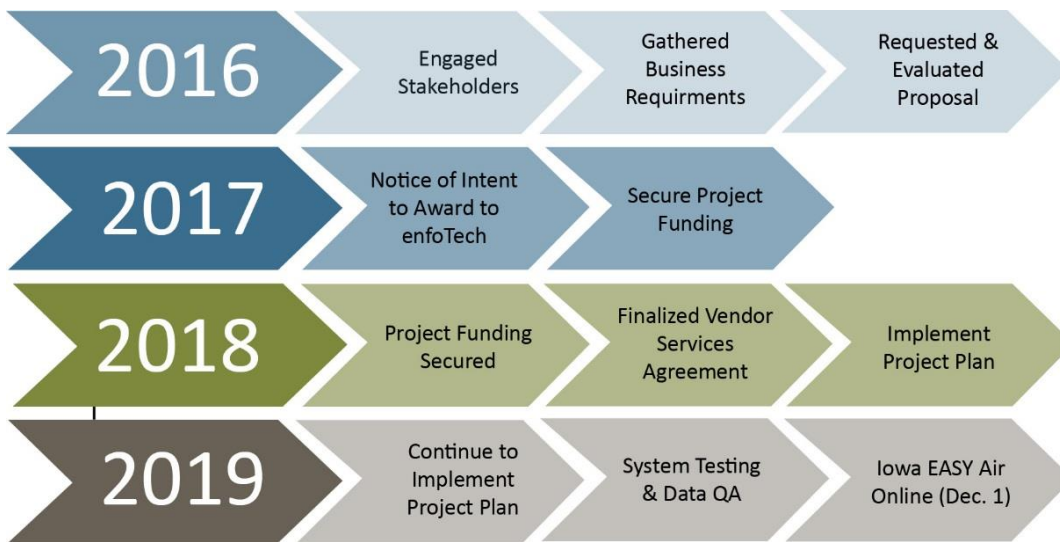
Industry Recommendations: In the spring of 2016, 66 stakeholders from business, industry and consulting firms met to detail their needs for a new electronic application system. Their vision reduces redundant data entry, increases data accuracy, saves time and cuts costs during application preparation and submittal, and speeds delivery of final permits.

Improved Service: Iowa’s investment in a customized electronic application system will fulfill that vision by reducing maintenance and support costs. Streamlining the DNR’s ability to review and issue these complex air permits will provide better customer service to meet the evolving needs of industry.

The DNR’s existing electronic application system is more than 17 years old and is seldom used (94 percent of applications are received on paper). It was written with now outdated software, is difficult to use and does not meet minimum federal electronic reporting standards.

How Can I Be Involved? Stakeholders will be asked to preview the system in spring 2019 and help test the system in summer 2019. DNR will provide progress updates during the entire development process.

When Will the System be Ready to Use? The DNR expects the system to be ready for use no later than Dec. 1, 2019.



How is the System Funded?

On May 2, 2018, the Iowa General Assembly passed a bill (Senate File 2414) appropriating \$954,000 to DNR to finance the electronic application project. \$728,000 will be used to pay for the contract with enfoTech Consulting, Inc. The remaining \$226,000 will be used to fund the project manager, Office of the Chief Information Officer (OCIO) support, and hardware.

More Information: Find out more about the electronic permit application system on the DNR’s [eAirServices webpage](#). Stay current on new developments by signing up for eAirServices Updates, the Air Quality technical emails that go direct to your inbox.

COMMUNICATIONS, OUTREACH & MARKETING

Communications
Section

Shannon Hafner
Info Spec 2, Fisheries
515-725-8241

Julie Tack
Info Spec 3, Parks
515-725-8276

Karen Grimes
Info Spec 2
Air Quality, Field Services
515-725-8279

Mick Klemesrud
Info Spec 2, Wildlife
515-725-8280

Tracy Fahrion
Info Spec 2, Web Services
515-725-8277

Jessie Brown
Info Spec 2
Land Quality, Water Quality
Social media
515-725-8278

Kati Bainter
Info Spec 3, Art Director
515-725-8296

Brian Button
Info Spec 3, Magazine Editor
515-725-8286

Vacant,
Info Spec 2

Records
Section

Renae Girdler
AA2 Team Leader
515-725-8480

Peggy Elscott
Clerk Specialist
515-725-8218

Allison Stiles
Clerk-Advanced
515-725-8297

Chris Robinson,
Clerk Advanced
515-725-0359

Records
Section

Megan Wisecup, Supervisor
515-238-4968

Vacant
Program Planner 3, Hunter Ed

Rachel Alliss
PP3, Hunter Ed
515-729-6037

Zach Benttine
PP2, Archery
515-205-8709

Chris Van Gorp
Executive Officer 2, Shooting Sports
and Ranges
515-725-8251

Barb Gigar
Training Specialist 2, Angler Education
515-494-3891

Holly Schulte
Training Specialist 1, Angler Education
563-927-3276

Todd Robertson
Program Planner 1, Outreach
Coordinator
515-725-8466

Anne Riordan
Training Specialist 1, Outreach
Coordinator
641-295-6028

Christina Roelofs
Naturalist
712-579-1801

Making Your Comments Count

The public plays an important role when the Iowa Department of Natural Resources (DNR) prepares air quality permits or updates state rules. DNR strives to ensure all projects meet federal and state standards. While DNR staff have the technical expertise, the public may identify other issues—protecting everyone’s air quality.

KEYS TO AN EFFECTIVE COMMENT



Point Out Unintended Consequences

Well-intended rules or permitting actions sometimes result in unintended consequences. Thoughtful public feedback may reveal these effects.



Provide Technical Information

Comments and assumptions supported by technical information are more helpful than general statements or form letters.



Suggest Alternative Solutions

Explain your concerns as clearly as possible and, if appropriate, suggest alternative requirements or different language.



Ask Questions

DNR staff welcome your questions. Understanding technical requirements can help you develop a meaningful comment or address your concerns. If you have questions, find DNR’s experts on the [public participation page](#) or call 515-725-8200.

COMMON COMMENT MISTAKES



The Comment Process is Not a Vote

One well-supported comment is often more effective than a hundred generic emails or form letters. DNR will respond to similar comments as a group.



Comments Not Specific to Proposal

Read and understand the proposal you are commenting on. Make sure the comment is relevant to the issue or action the DNR is proposing.



Comments Beyond DNR’s Authority

You may have a great suggestion to improve Iowa’s air, but it may not be within the authority granted to DNR by the legislature or Governor. The DNR is unable to address issues regarding odor, noise, light pollution and other factors not regulated under federal or state air quality standards.

READY TO MAKE YOUR VOICE HEARD?

Stay informed by signing up for DNR’s Air Quality Technical listserv. Check the [public participation page](#) regularly to learn about opportunities to become involved and make public comments.

Comment periods and public hearings provide opportunities for you to comment. DNR will not present information or answer questions during the formal part of a public hearing—that’s for your input. However, there may be time for questions before or after the hearing. Your voice improves DNR decisions through public notice and comment.

Iowa has made tremendous progress toward [improving statewide air quality](#) in the last 25 years. Together we can ensure Iowa’s air quality for the future.

Operating Permits & Emission Inventory Section

Air Quality Bureau, Wallace State Office Building , 502 E 9th Street, Des Moines, IA 50319-0034
Catharine Fitzsimmons, Bureau Chief

Kayla Lyon, Director

Alex Moon, Deputy Director

Ed Tormey, Division Administrator

Marnie Stein, Supervisor,
Operating Permits & Emission Inventory Section
Years of Service = 23

Jim McGraw, Supervisor
Program Development & Support Section
Years of Service = 24

Program Development

Emission Inventory

Jeremy Arndt
Environmental Specialist Sr
Operating Permit Review,
Permit & Application
Tracking, Iowa EASY Air
Years of Service = 22

Chris Kjellmark
Environmental Specialist Sr
Operating Permit Review
Acid Rain
Years of Service = 26

Nick Page
Environmental Specialist Sr
Emissions Inventory
Years of Service = 18

Taylor Dailey
Environmental Specialist
Operating Permit Review
Years of Service = 1

Zane Peters
Environmental Specialist
Operating Permit Review
Years of Service = 1

Seth Anderson
Environmental Specialist
Emissions Inventory
Years of Service = 11

Jeremy James
Environmental Specialist
Operating Permit Review
Years of Service = 1

Emilie Peterson
Environmental Specialist
Operating Permit Review
Years of Service = 1

Krysti Mostert
Environmental Specialist
Emissions Inventory
Years of Service = 13

Derek Wedemeier
Environmental Specialist
Operating Permit Review
Years of Service = 0.5

Program Development

Support

Jessica Reese McIntyre
Environmental Specialist
Records Support & Data
Entry
Years of Service = 5

Kevin Connolly
Environmental Specialist Sr
SLEIS/Iowa EASY Air Help Desk
Years of Service = 25

Virun Rongkavilt
Environmental Specialist
Records Support & Data
Entry
Years of Service = 29

Jason Dowie
IT Support Worker 4
SLEIS/Iowa EASY Air Help Desk
Years of Service = 13

Wendy Walker
Environmental Specialist Sr
Budget, Expense and
Revenue Tracking
Years of Service = 20

Years of Service for the Operating Permit & Emission Inventory Section = 117.5

Years of Service for the Program Development Section = 116

Total Years of Service = 233.5



TRAINING PLAN TITLE V OPERATING PERMIT SECTION

Employee: Derek Wedemeier

Start Date: February 8, 2021

Description:

The first three months of training will be spent reading instructional materials and discussing on-the-job permitting activities. In addition to the training schedule on the reverse side of this page, there will also be several opportunities for on-going training. Many of these are offered by the Environmental Protection Agency (EPA), Central States Air Resource Agencies (CenSARA), Air Pollution Training Institute (APTI), and the Iowa Department of Administrative Services (DAS) Performance and Development Solutions (PDS).

On-going Training (as they become available):

- New Employee Orientation
- Computer Training – New Horizons
- PDS Courses
- EASY Air webinars
- SLEIS webinars
- Compliance Assurance Monitoring (CAM) Workshop
- New Source Review (NSR) Workshop
- Control of Particulate Emissions
- Control of Gaseous Emissions
- NO_x Control Technology

Staff Meetings:

Section meetings are held once a month on Thursdays at 8:30 am. Often the discussions become very technical and acronyms are used quite frequently. Feel free to ask questions during the meeting, or discuss with your lead worker afterwards. Individual meetings are also held once a month. These meetings are held with each permit writer, their lead worker and the Title V Supervisor.

Bureau meetings are usually held once a month, typically on the fourth Thursday. The schedule is announced via e-mail.

APTI, EPA, and CenSARA classes:

<https://epaapti.csod.com/client/epaapti/default.aspx>

PDS Course Listings:

[Iowa DNR Intranet - Training & Education \(google.com\)](#)

DNR Learning Center/LMS to register for DNR and PDS classes:

<https://lsglm700.learnsoft.com/LSGLM/Login/dnrlogin.aspx>

Iowa Administrative Code (IAC)

<https://www.legis.iowa.gov/law/administrativeRules/chapters?agency=567&pubDate=03-25-2020>

TRAINING PLAN

February 15-19	<input type="checkbox"/> Discuss with lead worker the Title V permit application forms & instructions <input type="checkbox"/> Discuss with lead worker the Title V permit review checklist & manual <input type="checkbox"/> Register with EPA APTI and complete SI-422 Air Pollution Control Orientation course <input type="checkbox"/> Begin review of rules 22.100-22.199
February 22-26	<input type="checkbox"/> Work with lead worker on Title V permit application review <input type="checkbox"/> Continue review of Title V rules <input type="checkbox"/> Discuss the scope of the DNR's air quality rules & program with Marnie Stein <input type="checkbox"/> Attend Title V EASY Air webinar <input type="checkbox"/> Attend Construction Permit EASY Air webinar <input type="checkbox"/> Register for APTI 460: Introduction to Permitting <input type="checkbox"/>
March 1-5	<input type="checkbox"/> Review instructions on conducting a completeness review of a Title V permit application <input type="checkbox"/> Review two example Title V permit projects and discuss with lead worker <input type="checkbox"/> Complete APTI 460 and take test <input type="checkbox"/> Register for SI-431 - Air Pollution Control Systems for Selected Industries
March 8-12	<input type="checkbox"/> Continue working with lead worker <input type="checkbox"/> Register for RE100 – Basic Concepts in Environmental Sciences.: Module 6: Air Pollutants and Control Techniques <input type="checkbox"/> Continue reading SI-431 material
March 15-19	<input type="checkbox"/> Continue working with your lead worker <input type="checkbox"/> With lead worker's assistance get safety shoes, hard hat, & safety glasses (<i>if COVID allows</i>) <input type="checkbox"/> Complete APTI SI-431 and take test <input type="checkbox"/> Complete RE100 and take test
March 22-26	<input type="checkbox"/> Continue working with lead worker <input type="checkbox"/> Accompany Title V staff on a facility outreach visit (<i>if COVID allows</i>) <input type="checkbox"/> Register for SI-437: Module 7 - Fabric Filters <input type="checkbox"/> Register for SI-437: Module 4 - Electrostatic Precipitators <input type="checkbox"/> Register for SI-437: Module 6 – Wet Scrubbers
Mar 29-Apr 2	<input type="checkbox"/> Continue working with lead worker <input type="checkbox"/> Complete SI-437 and take test <input type="checkbox"/> Complete and take test
April 5-9	<input type="checkbox"/> Continue working with lead worker <input type="checkbox"/> Complete and take test
May - June	<input type="checkbox"/> Discuss the Emission Inventory units role within the AQB with Marnie Stein <input type="checkbox"/> Discuss the Construction Permit Section's role within the AQB with Sarah Piziali <input type="checkbox"/> Discuss the Program Development & Support Sections' roles with AQB with Jim McGraw <input type="checkbox"/> Discuss the Compliance Section's role (compliance, asbestos, stack testing, monitoring) within the AQB with Brian Hutchins

Small Source Operating Permits

Facility #	Facility Name	Site City
11-02-002	Ag Partners L.L.C.	Alta
75-05-001	Agriliance, LLC	Merrill
08-01-014	Archway Cookies Inc.	Boone
30-04-002	Arco Dehydrating Company Inc.	Lake Park
70-01-056	Bandag Inc. - Plant 4	Muscatine
82-02-033	Bee Line Company	Bettendorf
97-01-125	Big Soo Terminal	Sioux City
90-01-033	BP - Ottumwa Terminal	Ottumwa
78-01-035	Cargill AgHorizons	Council Bluffs
91-01-021	Cemen Tech Inc.	Indianola
47-01-006	Century Nutrition, Inc.	Ida Grove
46-02-001	Chantland - MHS Company	Dakota City
44-03-003	Chem Gro of Houghton Inc	Winfield
70-01-059	CHS Muscatine	Muscatine
26-01-002	City of Bloomfield	Bloomfield
72-01-002	City of Sibley	Sibley
14-03-001	Coon Rapids Municipal Utilities	Coon Rapids
36-05-001	Crestland Cooperatives	Riverton
02-02-001	Crestland Cooperatives	Prescott
39-06-001	Crestland Cooperatives	Menlo
97-02-007	Crop Production Services	Moville
97-06-001	Crop Production Services	Anthon
85-01-074	Daily Tribune	Ames
23-01-008	Dairy Pak	Clinton
52-01-018	Dept. of Veterans Affairs Medical Center	Iowa City
27-01-004	Farmers Coop Grain & Seed C	Lamoni
41-04-002	Five Star Cooperative - Klemme	Klemme
34-01-022	Floyd County Ag Center	Charles City
99-01-007	Gold-Eagle Cooperative - Eagle Grove	Eagle Grove
19-01-014	GROWMARK, Inc.	New Hampton
38-01-001	Grundy Center Municipal Light and Power	Grundy Center
28-01-013	Henderson Products, Inc.	Manchester
51-01-007	Jefferson Company Hospital	Fairfield
78-01-049	Jennie Edmundson Memorial Hospital	Council Bluffs
07-01-108	Jerald Manufacturing Company	Waterloo
70-03-002	J-M Manufacturing Company, Inc.	Wilton
23-08-002	Kinder Morgan COCHIN LLC	Calamus
95-02-002	Lake Mills Municipal Light	Lake Mills
17-01-031	Land O'lakes Inc.	Mason City
16-05-002	Land O'lakes Inc.	Clarence
71-01-008	Land O'Lakes Purina Feed LLC - Sheldon	Sheldon
06-10-001	Linn Cooperative Oil Company	Newhall
74-01-014	Max Yield Co-op	Emmetsburg
64-01-005	Mepco	Marshalltown
23-01-059	Mercy Medical Center - Clinton North Campus	Clinton
97-01-059	Missouri Valley Steel Company	Sioux City

Small Source Operating Permits

75-02-003	Nelson Hatchery Inc.	Akron
28-01-010	Oribs Division, Menasha Corporation	Manchester
90-01-032	Ottumwa Reg. Health	Ottumwa
28-04-002	Paladin Attachments	Delhi
08-01-009	Percival Scientific Company	Boone
82-17-001	Rockingham-Lunex Company	Pleasant Valley
22-04-003	SilverEdge Cooperative	Strawberry Point
84-03-014	Sioux Center Farmers Coop Society	Sioux Center
87-02-009	Terra International Inc.	Lenox
24-03-002	Terra International Inc.	Schleswig
06-01-017	Terra International Inc.	Vinton
18-04-003	Terra International Inc.	Quimby
13-04-003	Terra International Inc.	Pomeroy
43-01-005	Terra International Inc.	Missouri Valley
67-02-003	Terra International Inc.	Mapleton
70-01-066	Terra International Inc.	Muscatine
07-02-019	Universal International Inc.	Cedar Falls
07-01-064	UTC Railcar Repair Services LLC/Waterloo Shop	Waterloo
07-02-003	Viking Pump, Inc - Iron Foundry	Cedar Falls
69-02-004	Villisca Elevator Inc.	Villisca
29-01-075	Vista Bakery	Burlington
92-01-020	Washington Evening Journal	Washington
32-06-001	Watowam Farm Service Company	Dolliver
99-01-008	Zoetis, Inc.	Eagle Grove

ATTACHMENT D: Fee Attachment

Attachment C
from the March 27, 2018 guidance

[see the attached copy]

ATTACHMENT C
Annual Financial Data Form for 40 CFR Part 70
Permitting Authority: Iowa Department of Natural Resources
Annual Period: 07/01/2019 to 06/30/2020 (FY 2020)

Annual Program Revenue		
A	Total Program Revenue (Fees Paid by Part 70 Sources)	\$12,388,558
Annual Presumptive Minimum Cost Calculation		
B	Total Emissions of "Regulated Pollutants (for presumptive fee calculation)"	102,814 tons
C	Presumptive Minimum Fee Rate During Period (\$/ton)	\$53.81
D	Total Greenhouse Gas (GHG) Cost Adjustments (as applicable)	0
E=(B*C)+D	Presumptive Minimum Cost for the Program	\$5,532,421
A < E or A ≥ E	Compare Total Program Revenue to Presumptive Minimum Cost Enter: "Less Than" or "Greater Than" or "Equal To"	A ≥ E
Annual Program Costs		
F	Direct Labor Costs ¹	\$3,586,487
G	Other Direct Costs ²	\$3,084,765
H = F+G	Total Direct Costs	\$6,671,252
I	Known Indirect Costs ³	\$444,007
J = K*L	Calculated Indirect Costs ⁴	n/a
K	Indirect Rate	12.38%
L	Total Cost Base for the Part 70 Program	
M = I or J	Total Indirect Costs	\$444,007
N = H + M	Total Program Costs	\$7,115,259
O = A - N	Annual Operating Results <i>(Report deficits in parentheses)</i>	\$5,273,299
Program Balance of Accounts (Report deficits in parentheses)		
P	Beginning of Year Balance ⁵	\$8,605,416
Q = O	Annual Operating Results	\$5,273,299
R	Fee Revenue Transferred In (describe in comments)	\$0
S	Non-Exchange Revenue Transferred In (describe in comments) - Informational Only	\$0
T	Fee Revenues Transferred Out (describe in comments)	\$0
U = O+Q+R-T	End of Year Balance	\$5,273,299

¹ This is the sum of all direct labor costs, including regular payroll, overtime payroll, leave, fringe, and any other administrative surcharges.

² This is the sum of all other direct costs, including travel, materials, equipment, contractor, and any other costs directly allocable to the part 70 program.

³ Indirect Costs may either be known or calculated. If known, enter on this row; if calculated, skip to the next three rows.

⁴ If Indirect Costs are calculated, enter the result here, and enter the rate and base below. Accounting or budgeting personnel may be able to provide additional information on or assistance with calculating Indirect Costs.

⁵ This is the prior year's "End of Year Balance."

Background

The information in Attachment C is for the air contaminant source fund, established in [Iowa Code 455B.133B](#). There are two accounts in the fund: air emission fee account and operating permit application fee account. No other revenues or expenses are included in the calculations.

Information provided is from state fiscal year (FY) 2020, which began on July 1, 2019 and ended on June 30, 2020. FY 2020 is the most recently completed fiscal year. The accounting for the fiscal year ending on June 30, 2021, will not be completed until later in 2021.

Several Iowa DNR attachments are included with the Attachment C submittal. The file, FY 2020 Title V Expense & Revenue Summary, provides an annual summary of the air contaminant fund. The file has a section that lists the total air quality program's expenses and revenues and is included for reference purposes.

Personnel expenses are tracked by specific codes per accounting cost center by funding stream. The file, FY 2020 Personnel Time Code Data, provides the annual personnel summary. Also included are the SFY20 stakeholder memo and budgetary agenda item presented to the Environmental Protection Commission.

Total Program Revenue (A): The amount listed reflects fees paid to the air contaminant source fund during FY 2020 along with accrued interest. The amount may include fees that were not assessed during FY 2020, such as corrected prior year emission inventory fees. Air Quality Bureau staff review air contaminant source fund deposits monthly to ensure revenue is deposited into the correct account and that non-Title V revenue is not inadvertently deposited into the air contaminant fund.

Total Greenhouse Gas Cost Adjustment (D): Fees are not assessed on greenhouse gas emissions.

Direct Labor Costs (F): The amount listed reflects the personnel costs paid by the air contaminant source fund.

Other Direct Costs (G): Expenses include DNR legal services, subawards with Linn and Polk Counties, contractual agreements with the University of Iowa State Hygienic Laboratory, the Iowa Waste Reduction Center, IT contractors for SLEIS and Iowa EASY Air, vehicles, records scanning, communications, utilities, training, and other miscellaneous office expenses, and other travel expenses.

Known Indirect Costs (I): The Iowa DNR utilizes an indirect rate that is approved by the Department of the Interior, the largest federal grantor. The approved indirect rate for FY 2020 was 12.38% (K) and was multiplied by the direct labor costs (F).

Beginning Year Balance (P): This is the SFY2019 end of year balance.

Fee Revenue Transferred In/Out (R/T): Air contaminant funding is the sole funding source for the Title V operating permit program. Non-Title V funding is not transferred into the air contaminant fund. Revenue is not transferred out of the air contaminant to accounts or programs.

ATTACHMENT E: Entrance Meeting Attendees

EPA

David Peter
Amy Algoe-Eakin
Dana Skelley
Ward Burns
Robert Cheever
Patricia Scott
Kathy Finazzo

IDNR

Sarah Piziali
Jim McGraw
Chris Roling
Gary Smith
Karen Kuhn
Michael Hermsen
Peter Zayudis
Chris Kjellmark
Jeremy Arndt
Brad Ashton
Wendy Walker

ATTACHMENT F: Exit Meeting Attendees

EPA

David Peter

Amy Algoe-Eakin

Ward Burns

Robert Cheever

Patricia Scott

IDNR

Sarah Piziali

Chris Roling

Gary Smith

Karen Kuhn

Michael Hermsen

Peter Zayudis

Marnie Stein

Chris Kjellmark

Jeremy Arndt

ATTACHMENT G: IDNR's Response Letter Regarding the Draft Report

[see the attached copy]



March 4, 2022

Amy Algoe-Eakin, Branch Chief
Air Permitting and Standards
Air and Radiation Division
U.S. Environmental Protection Agency Region 7
11201 Renner Blvd
Lenexa, KS 66219

Sent by email

Re: DNR Comments on EPA's Draft Program Review Report

Dear Ms. Algoe-Eakin:

Thank you for providing us the opportunity to comment on the draft program review report (report) sent via email by David Peter on January 25, 2022. The report summarizes the findings and conclusions of the Environmental Protection Agency's (EPA) review of the Iowa Department of Natural Resources' (DNR's) air construction and Title V operating permit programs and DNR's administration of Title V fees. The program review was conducted virtually during July and November of 2021.

Please find that our specific comments follow the organizational structure of the report and are ordered by report section and page number followed by the corresponding report paragraph number (where applicable) and item letter (where applicable) for reference. Two general comments are included after the specific comments.

Specific Comments:

1. Section B (page 4), numbered paragraph 4, item b:

EPA Comment: IDNR has a relatively small amount of "backlogged" Title V permits. EPA recognizes that IDNR made efforts beginning in 2014 to reduce the Title V permit backlog. The EPA also recognizes that staff turnover in the last year or so has resulted in a slight increase in the backlog over that period.

DNR Comment: DNR continues to make progress on reducing the Title V permit backlog. The section has been fully staffed since February 2021, and currently 14 Title V applications are backlogged. DNR plans to issue permits for at least 8 of those facilities in 2022, reducing the backlog by over 50%.

2. Section B (page 5), numbered paragraph 1:

EPA Comment: The majority of the permits that EPA reviewed that included 12-month rolling limits didn't specify the consequences of exceeding the limit in the first months the limit applies (for example, the limit is exceeded in the 9th month after the limit is applicable). Although EPA believes that it would not be a compelling argument, an argument could be made that a violation couldn't possibly occur until the 12th month of operating under the limit, since one could argue that a full 12-month period is needed to compare to the 12-month rolling limit. The EPA recommends that IDNR consider including a statement in the permit that an exceedance at any point in the first 11 months that the limit applies would constitute a violation of the limit at the time that the limit is exceeded.

DNR Response: DNR will start to include language to address this concern in construction permits going forward. We will work with EPA to ensure the language developed is consistent with EPA's concerns in the area.

3. Section B (page 5), numbered paragraph 2:

EPA Comment: IDNR indicated in Question (II)(B)(3)(4) and (VI)(A)(1) that environmental justice issues are currently not generally considered in its permitting issuance process. We recognize that Iowa does not have any EJ legislation, policy, or general guidance related to permitting. We further recognize that IDNR interprets the Clean Air Act (Act) and their State Implementation Plan (SIP) to not address EJ in permitting actions. However, other states with similar SIPs have received comments alleging that a minor construction permit violated Title VI of the Civil Rights Act of 1964. Therefore, we encourage the IDNR to consider EJ issues and engage with communities as appropriate. Further, EPA R7 is aware of IDNR's interest in potentially utilizing EJ considerations in the future. To that extent, EPA encourages IDNR to consider potential EJ concerns in future permitting activities.

DNR Response: DNR works diligently to ensure our work is transparent to the public. This transparency is accomplished in a variety of ways that not only inform the public of the applications we currently are reviewing, but also assists them in engaging with the DNR and providing meaningful comments that could impact the decisions made during the review of an application.

DNR has several ways a member of the public can stay informed about proposed construction or Title V permit applications in their area. Iowa EASY Air provides a [public inquiry portal](#) that allows anyone to search for and view active applications, permits seeking public comment, and previously issued construction and Title V operating permits. DNR's [construction permit search](#) website provides an alternative to Iowa EASY Air and allows the public to search by varied criteria such as city or county to access issued permits and applications that are currently under review. The public may also view Title V operating permits on public notice and completed Title V permits on the [Title V permit web page](#). On these sites the DNR encourages the public to review the applications and emissions information and submit comments or questions to the DNR by providing the direct contact information for the staff member assigned review.

DNR recently released a new GIS-based method the public can use to search for active applications. The [Environmental Services Dashboard](#) allows the public to use a map tool to target areas of interest and display active construction and Title V permit applications in those areas along with a link to Iowa EASY Air to further view the application information. The dashboard also provides summary information for the public on the number of active applications by submission type and review status in the selected areas of interest.

In addition to providing opportunities to view and comment on permits, the DNR maintains a [public participation website](#) that lists all opportunities for the public to participate in and make recommendations to the DNR on a variety of rulemaking and planning activities, including meetings and workgroups.

The DNR also understands that it can be difficult for the public to feel like they can meaningfully participate in the permitting and rulemaking process and to know what types of comments and suggestions are effective. DNR has made changes to address these challenges by including non-discrimination language in our public notices, launched a website devoted to environmental justice, and created a [guidance document](#) for the public on the keys to making an effective public comment.

Recently, the DNR launched an [environmental justice website](#) that outlines the DNR's language and disability plans and reflects DNR's commitment to serving Iowans of all backgrounds and cultures, including individuals

with limited English proficiency and providing individuals with disabilities the opportunity for full participation in its programs, services, and activities. To further that effort the following language has recently been added to our air quality public notices:

“Individuals with disabilities or limited English proficiency are encouraged to participate in all DNR activities, including submitting public comments. If a reasonable accommodation or language services are needed to participate, contact the Air Quality Bureau staff member listed or Relay Iowa TTY Service at 800-735-7942 in advance to advise them of your specific needs. DNR’s language access and disability nondiscrimination plans are available at <https://www.iowadnr.gov/About-DNR/Environmental-Justice>”

DNR feels that the public plays an important role in our work, including when the DNR prepares air quality permits or updates state rules. We are confident that these efforts to engage with the public, assist us in making better decisions and ensure clean air for all Iowans. We welcome any feedback or suggestions on how we could further improve in these areas.

4. Section B (page 5), numbered paragraph 3:

EPA Comment: As part of this permit review, the EPA determined that IDNR appeared to appropriately identify all of the applicable requirements, including the applicable NSPS and NESHAP subparts, in the permitting actions that we reviewed. As part of our routine review of Title V permits proposed for issuance by IDNR, EPA also has determined that the IDNR, in general, identifies all of the appropriate applicable requirements. However, we do note that the level of detail of the applicable requirements in Title V permits has not necessarily been consistent from permit to permit, sometimes even for the same subpart. The EPA recognizes that there are several approaches to incorporating applicable requirements from an applicable subpart. On one end of the spectrum, the permit could simply indicate the facility or affected source is subject to a certain subpart and refer the permittee to the Code of Federal Regulations. On the other end, the permit could include the entire subpart verbatim, with no identification of the specific paragraphs that apply to the affected source. The EPA recognizes that there are issues with both of these extreme approaches, as neither approach adequately informs the permittee or the public of the specific applicable requirements that the permittee is required to comply with. Typically, the most useful approach would be one that is a balance of these two extremes. The EPA recommends that IDNR work toward achieving consistency in how applicable requirements are included in the draft permit, especially for permits with affected sources subject to the same subpart. This approach would ensure that the permittee and the public are made aware of the applicable requirements in a clear and consistent manner.

DNR Response: DNR appreciates EPA's findings that the NSPS and NESHAP applicability determinations made by DNR in Title V permits are correct. DNR agrees that consistency in the level of detail of the NSPS and NESHAP requirements could be improved, especially when citing the same subpart for multiple emission sources in the same Title V permit. As discussed previously with EPA, DNR continuously strives to capture the correct balance and level of detail between citing the entire subpart, correctly capturing the requirements of individual construction permits, and providing enough detail, but not a burdensome amount of detail, for the public and field office inspectors. DNR looks forward to working with EPA to improve consistency and encourages EPA to provide more specific guidance and examples from other states to better explain how EPA would like NSPS and NESHAP subparts cited in Title V permits.

5. Section B (page 6), numbered paragraph 4:

EPA Comment: IDNR has included the phrase “of the source category” when indicating that the facility is subject to certain NSPS and NESHAP subparts in Title V permits. IDNR staff have indicated that the reason this phrase is used for certain subparts is because the IDNR has not adopted that federal rule and that they have no authority

to determine whether the rule applies or doesn't. Regardless of the rationale for the use of its phrase, the phrase leads to ambiguity on whether the rule actually applies or not. As stated at 567 IAC 22.108(1)(f), the Title V permit should clearly identify all applicable requirements. Should IDNR have any question whether a federal rule that IDNR has not adopted is applicable, IDNR should coordinate with EPA Region 7 for a determination such that the Title V permit will clearly identify whether the rule is applicable to the facility.

DNR Response: DNR used the "of the source category" for a brief time several years ago after several EPA regulations were remanded, vacated, or not adopted into state rules. However, DNR discontinued using the language in January 2013 based on a comment from EPA Region 7. DNR's practice since that time is for the Title V permit writer to make a clear determination in the permit of which NSPS and NESHAP subparts the facility is subject to. If the "of the source category" language was included in a Title V permit since January 2013, it was an oversight on DNR's part and not DNR's intent to avoid making a clear determination. As staff continue to renew older Title V permits, DNR will be watchful to remove any old instances of the "of the source category" language.

6. Section B (page 6), numbered paragraph 5:

EPA Comment: During routine reviews of IDNR's proposed draft Title V permits and follow-up discussions with IDNR staff, it is EPA's understanding that the statement of basis or Title V permit writer notes typically only address changes that occurred since the previous Title V was issued (such as physical changes at the facility or changes in the applicable requirements). While this approach likely has benefits, such as highlighting the changes to the previous permit so that the focus of the review can be on those changes, it also doesn't provide a complete summary of the rationale for all applicable requirement determinations for the facility. As Title V permits are generally renewed every five years, there is the likelihood that interested parties including the public and permitting staff from IDNR, EPA and the affected facility may not have been involved in the drafting and issuance of the previous Title V permit. Therefore, EPA recommends that the statement of basis or permit writer notes reference the previous statement of basis in some manner. A couple of options that EPA identified, but there are certainly others, include making the previous statement of basis part of the permitting record for the renewal permit or clearly indicate where the public or other entities can easily obtain the previous statement of basis.

DNR Response: DNR's current practice is to develop a statement of basis that combines the fact sheet and permit writer notes into one document. As discussed in several prior conversations with EPA, DNR agrees that it would be beneficial to carry forward more details from the previous statements of basis. The Title V supervisor and senior environmental specialists continue to work with the other permit writing staff to make these documents more robust. DNR is also considering providing the previous notes and statements in a combined historical document during the public notice period. DNR encourages EPA to provide additional guidance and examples from other states to better explain how EPA would like DNR to improve the statements of basis.

7. Section B (page 7), numbered paragraph 6:

EPA Comment: The EPA recommends that IDNR investigate opportunities to assess application fees for significant modification applications such that this potentially important component of the Title V permit program is fully implemented.

DNR Response: The DNR currently has authority in Iowa Code (455B.133B) to assess application fees for processing modifications to Title V operating permits. However, implementing rules in 567 Iowa Administrative Code (IAC) Chapter 30 only authorize the DNR to collect application fees for initial and renewal Title V permit applications. The DNR will continue to work with affected stakeholders to obtain support for making changes to

the Iowa Administrative Code to add modifications to the list of Title V permit application types that are eligible for funding with Title V permit application fees.

8. Section C (page 8), 1st paragraph:

EPA Comment: EPA stated that fee revenue is currently tracked using SLEIS.

DNR Response: The State & Local Emissions Inventory System (SLEIS) is used for tracking source emissions only. Emissions data from SLEIS for Title V sources is imported into a Microsoft Access database called “TV Emissions and Fees Tracking.” As annual emissions fees payments are received from Title V sources they are cross-checked with the emissions data previously imported from SLEIS as part of the process of entering the payment information into the database. In addition to this Access database, DNR Budget & Finance record the deposits and are the official financial record for Title V emissions fees payments. The Budget & Finance tracking information is compared monthly to the bureau’s tracking information and any discrepancies are resolved.

9. Section C (page 8), 4th paragraph (Workday):

EPA Comment: EPA does recommend that IDNR ensure that the “Workday” Title V work tags are sufficiently descriptive to demonstrate that the activities and expenses being claimed for Title V activities actually qualify as valid Title V activities.

DNR Response: The Title V work tags are sufficiently descriptive that when combined with staff time use data, they provide DNR with adequate information to demonstrate that the activities and expenses qualify as valid Title V activities.

10. Section C (page 8), 5th paragraph: Emissions trends:

EPA Comment: In addition, the amount of regulated air emissions in Iowa that are covered under the emissions fee program are trending down. Therefore, Iowa informed the EPA that it is considering potential actions that it may need to take in response to this reduction to ensure that the Title V permit program is adequately funded.

DNR Response: The downward trend of feeable air emissions in the state is not unique to Iowa and reflects the 50 plus years of successes that the partnership between federal and state governments has had in implementing the Clean Air Act. Like many states, DNR continues to explore long term, stable funding mechanisms that will allow for a continued strong air program presence in the state. The DNR looks forward to having EPA’s support and partnership in this process.

11. Section D (page 9), numbered paragraph 1:

EPA Comment: The IDNR air permitting program is divided into two groups – Construction Permit Section and Operating Permits and Emissions Inventory Section.

Based on information provided by IDNR as part of the NSR Questionnaire, the Construction Permit Section has a total of 14 staff positions. This includes a Section Chief, four Senior Engineers, and nine permit writers. The average length of NSR permitting experience is over 17 years.

Based on information provided by IDNR as part of the Title V Questionnaire, the Operating Permit and Emissions Inventory Section has a total of eight staff positions related to Title V permit development. This includes a Section Chief, two Senior Environmental Specialists, and five permit writers. The average length of operating permitting experience is over nine years.

DNR Response: The construction permit section consists of one supervisor (instead of chief), five senior engineers (instead of four), and nine engineers (instead of permit writers). All engineers in the section, including the senior engineers, are responsible for writing construction permits.

The operating permit and emission inventory section includes one supervisor (instead of chief), two senior environmental specialists, and five environmental specialists. All staff in the section except the supervisor, write operating permits.

12. Section D (page 9), numbered paragraph 2: items a and b:

EPA Comment: For AGP Eagle Grove project 17-314, it appears that the emission factors for certain units associated with the project are developed from stack testing. We recommend that, in future permitting actions, IDNR provide more detail in either the permit writer notes or the permit itself on the specific procedure from converting stack test results to an emission factor that will be used in compliance demonstrations.

DNR response: DNR agrees with this comment and will ensure in the future that the procedure to convert a stack test result to an emission factor is spelled out in either the permit or engineering evaluation. Additionally, DNR has asked AGP to amend the permits issued in project 17-314 to document the procedure.

EPA Comment: For Flint Hills Menlo project 20-282, section 6 of permit indicates that a CEMS was not required by the permit. However, it appears that to demonstrate compliance with certain NO_x limits, a CEMS is utilized.

DNR response: DNR has reviewed the permit and concurs that a CEMS is required to demonstrate compliance. DNR has asked POET, the new owner of this facility, to amend the permit to correct the error.

General Comments:

1. Where the EASY Air system is mentioned in the report, please refer to the system as “Iowa EASY Air” to avoid possible copyright infringements.
2. Attachment A should be renamed “List of Construction Permit Files Reviewed” to clarify that the list does not include Title V operating permits

We appreciate the time and effort that EPA has put forward in conducting this program review. The recommendations provided by EPA from this program review will help us to further fine tune our permitting programs. Please feel free to contact me, or any of the individuals who are copied on this letter, if you have questions or need additional information.

Sincerely,

Catharine Fitzsimmons, Chief
Air Quality Bureau

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