

**Iowa Department of Natural Resources  
Title V Operating Permit**

**Name of Permitted Facility: American Bath Group**  
**Facility Location: 2908 N. Court Street, Ottumwa, IA 52501**  
**Air Quality Operating Permit Number: 00-TV-038R2**  
**Expiration Date: November 14, 2027**  
**Permit Renewal Application Deadline: May 14, 2027**

**EIQ Number: 92-5186**  
**Facility File Number: 90-01-023**

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**Responsible Official**

**Name: Lee Russell**  
**Title: EHS Director**  
**Mailing Address: 435 Industrial Road, Savannah, TN 38372**  
**Phone #: 731-607-6215**

**Permit Contact Person for the Facility**

**Name: Lee Russell**  
**Title: EHS Director**  
**Mailing Address: 435 Industrial Road, Savannah, TN 38372**  
**Phone #: 731-607-6215**

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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**



Marnie Stein, Supervisor of Air Operating Permits Section

11/15/2022

Date

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## Abbreviations

acfm.....	actual cubic feet per minute
CFR.....	Code of Federal Regulation
°F.....	degrees Fahrenheit
EIQ.....	emissions inventory questionnaire
gr./dscf.....	grains per dry standard cubic foot
gr./100 cf.....	grains per one hundred cubic feet
IAC.....	Iowa Administrative Code
IDNR.....	Iowa Department of Natural Resources
MVAC.....	motor vehicle air conditioner
NSPS.....	new source performance standard
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
TPY.....	Tons per year
USEPA.....	United States Environmental Protection Agency

### **Pollutants**

PM.....	particulate matter (equivalent to TSP, total suspended particulate)
PM <sub>10</sub> .....	Particulate matter ten microns and less in diameter
SO <sub>2</sub> .....	sulfur dioxide
NO <sub>x</sub> .....	nitrogen oxides
VOC.....	volatile organic compound
CO.....	carbon monoxide
HAP.....	hazardous air pollutant

# I. Facility Description and Equipment List

Facility Name: American Bath Group  
Permit Number: 00-TV-038R2

Facility Description: Plastics Plumbing Fixtures Manufacturing (SIC 3088)

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## Equipment List

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<b>Emission Point Number</b>	<b>Emission Unit Number</b>	<b>Emission Unit Description</b>	<b>DNR Construction Permit Number</b>
EP-101, EP-102, EP-103	EU-101	Spraying of Vinyl Ester Resin w/ fiberglass chop, roll out, and cure (First Laminate Station)	22-A-051, 22-A-052, 22-A-053
	EU-102	Spraying of Polyester Resin w/ fiberglass chop, roll out, and cure (Second Laminate Station)	
EP-104	EU-104	Assembly Operations for Spa Manufacturing	22-A-081

## II. Plant-Wide Conditions

Facility Name: American Bath Group

Permit Number: 00-TV-038R2

Permit conditions are established in accord with 567 Iowa Administrative Code rule 22.108

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### Permit Duration

The term of this permit is: five (5) years from date of issuance

Commencing on: November 15, 2022

Ending on: November 14, 2027

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.

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### Emission Limits

*Unless specified otherwise in the Source Specific Conditions, the following limitations and supporting regulations apply to all emission points at this plant:*

Opacity (visible emissions): 40% opacity

Authority for Requirement: 567 IAC 23.3(2)"d"

Sulfur Dioxide (SO<sub>2</sub>): 500 parts per million by volume

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 – Chapter 24. For sources constructed, modified or reconstructed on or 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 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – 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 - A person shall take reasonable precautions to prevent particulate matter from becoming airborne in quantities sufficient to cause a nuisance as defined in Iowa Code section 657.1 when the person allows, causes or permits 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 roads. Ordinary travel includes routine traffic and road maintenance activities such as scarifying, compacting, transporting road maintenance surfacing material, and scraping of the unpaved public road surface. (the preceding sentence is State Only) 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 public 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 which require abatement pursuant to this subrule. Reasonable precautions may include, but not be 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, fertilizer 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.
6. Reducing the speed of vehicles traveling over on-property surfaces as necessary to minimize the generation of airborne dusts.

Authority for Requirement: 567 IAC 23.3(2)"c"

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### III. Emission Point-Specific Conditions

Facility Name: American Bath Group  
 Permit Number: 00-TV-038R2

#### Emission Point ID Number: EP-101, EP-102, EP-103

##### Associated Equipment

Emission Point Number	Emission Unit Number	Emission Unit Description	Maximum Design Capacity	Control Equipment Description	DNR Construction Permit Number
EP-101, EP-102, EP-103	EU-101	Spraying of Vinyl Ester Resin w/ fiberglass chop, roll out, and cure (First Laminate Station)	137.5 lbs resin per hour <sup>(1)</sup>	Dry Filters (CE-101) <sup>(2,3)</sup>	22-A-051, 22-A-052, 22-A-053
	EU-102	Spraying of Polyester Resin w/ fiberglass chop, roll out, and cure (Second Laminate Station)	437.5 lbs resin per hour <sup>(1)</sup>		

- (1) Maximum capacity of the spray gun is 35 pounds per minute or 2100 pounds per hour. The Maximum Design Capacity listed is based on a production capacity of 30 spas per day.
- (2) Spray guns for both resins shall be Fluid Impingement Technology, (a type of nonatomized application) to control VOC and HAP emissions.
- (3) Polyester resin may contain a vapor suppressant to control VOC and HAP emissions.

#### Applicable Requirements

##### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The following emission limits shall not be exceeded per emission point:

Pollutant: Opacity

Emission Limit(s): 40%<sup>(1)</sup>

Authority for Requirement: DNR Construction Permits 22-A-051, 22-A-052, and 22-A-053  
 567 IAC 23.3(2)"d"

- (1) An exceedance of the indicator opacity of no visible emissions will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM<sub>2.5</sub>)

Emission Limit(s): 0.73 lb/hr

Authority for Requirement: DNR Construction Permits 22-A-051, 22-A-052, and 22-A-053

Pollutant: Particulate Matter (PM<sub>10</sub>)  
 Emission Limit(s): 1.1 lb/hr  
 Authority for Requirement: DNR Construction Permits 22-A-051, 22-A-052, and 22-A-053

Pollutant: Particulate Matter (PM)  
 Emission Limit(s): 1.1 lb/hr, 0.1 gr/dscf  
 Authority for Requirement: DNR Construction Permits 22-A-051, 22-A-052, and 22-A-053  
 567 IAC 23.3(2)"a"

Pollutant: Total HAP  
 Emission Limit(s): See Note <sup>(2)</sup>  
 Authority for Requirement: DNR Construction Permits 22-A-051, 22-A-052, and 22-A-053

(2) As specified in §63.5805(c), the facility must meet each applicable organic HAP emission limit in Table 3 in 40 CFR Part 63, Subpart WWWW. The emission limit for open molding mechanical application using a corrosion-resistant or high strength resin is 113 lbs organic HAP per ton of resin, based on a 12-month rolling average. The emission limit for open molding mechanical application using a non-corrosion-resistant or non-high strength resin is 88 lbs organic HAP per ton of resin, based on a 12-month rolling average.

The following combined emission limits shall not be exceeded for the following emission points:

Pollutant: Volatile Organic Compounds (VOC)  
 Emission Limit(s): 145.0 tons/yr<sup>(1)</sup>  
 Authority for Requirement: DNR Construction Permits 22-A-051, 22-A-052, and 22-A-081

(1) This limit applies to the following emission units: Spraying of Vinyl Ester Resin (EU-101), Spraying of Polyester Resin (EU-102) and Spa Assembly (EU-104).

Pollutant: Total HAP  
 Emission Limit(s): 95.3 tons/yr<sup>(2)</sup>  
 Authority for Requirement: DNR Construction Permits 22-A-051, 22-A-052  
 (2) Limit applies to the following emissions units: Spraying of Vinyl Ester Resin (EU-101) and Spraying of Polyester Resin (EU-102)

National Emission Standards for Hazardous Air Pollutants (NESHAP):

*The following subparts apply to the emission unit(s) in these permits:*

<b>Emission Unit Number</b>	<b>Subpart</b>	<b>Title</b>	<b>Type</b>	<b>State Reference (567 IAC)</b>	<b>Federal Reference (40 CFR)</b>
EU-101, EU-102	A	General Conditions	New	23.1(4)	§63.1 – §63.15
	WWWW	National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production	New	23.1(4)"cw"	§63.5780 – §63.5935

(1) The facility is a reinforced plastic composites production facility. The facility has the following operations that are considered an affected source for Subpart WWWW in accordance with §63.5790(b): Open molding, closed molding, centrifugal casting, continuous lamination, continuous casting, polymer casting, pultrusion, sheet molding compound (SMC) manufacturing, bulk molding compound (BMC) manufacturing, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts you also manufacture.



### **Operating Requirements with Associated Monitoring and Recordkeeping**

*All records as required by these permits shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping requirements for these permits shall be:*

#### **General Operating Limits, Monitoring and Recordkeeping Requirements:**

- A. Resin shall be applied in the First Laminate Station (EU-101) and the Second Laminate Station (EU-102) by using spray guns that meet the definition of *nonatomized mechanical resin application* and *fluid impingement technology* from §63.5935 of Part 63, Subpart WWWW. The spray guns must be operated according to the manufacturer's directions, including instructions to prevent the operation of the spray gun at excessive spray pressure. The owner or operator shall not apply resin using atomized mechanical application.
  - i. The owner or operator must maintain documentation provided by the spray gun manufacturer that the spray gun model has been organic HAP emissions tested and that the test results showed that the use of the application tool results in organic HAP emissions that are no greater than the organic HAP emissions predicted by the applicable nonatomized application equations in Table 1 in Subpart WWWW.
- B. The vinyl ester resin applied shall meet the definition *high strength resin* from §63.5935 of Part 63, Subpart WWWW. This definition states: *polyester resins which have a casting tensile strength of 10,000 pounds per square inch or more and which are used for manufacturing products that have high strength requirements such as structural members and utility poles*. If the vinyl ester resin does not meet the definition of high strength resin, it shall be considered a non-corrosion-resistant/high strength (non-CR/HS) resin for Subpart WWWW.
  - i. The owner or operator shall maintain records from the vinyl ester resin manufacturer or supplier that documents that the resin meets the definition of a high strength resin.
- C. If a vapor suppressed resin is used, the owner or operator must maintain a record of the vapor suppressant effectiveness (VSE) of the vapor suppressant. A vapor suppressed resin is a resin containing a vapor suppressant added for the purpose of reducing organic HAP emissions during curing. The VSE shall be determined by conducting a test according to the procedures specified in appendix A to subpart WWWW, "Test Method for Determining Vapor Suppressant Effectiveness." Records shall be maintained on-site for each vapor suppressed resin used and shall include a copy of the full documentation of the test done by the resin supplier or manufacturer.
  - i. Documentation of the VSE has been submitted to the Department for AOC Polyester Resin C431-EPA-22.
  - ii. The owner or operator shall submit a report to the Department on the VSE for any other resin, besides AOC Polyester Resin C431-EPA-22, used at the facility. This report shall be submitted to the Department no later than 30 days before using the resin for production and shall include calculations on how the resin will comply with the applicable emission standards for organic HAP from Subpart WWWW.
  - iii. The owner or operator shall maintain the following records from the resin supplier for each shipment of resin received:

- a) The product name of the resin.
- b) A statement that the resin contains a vapor suppressant.

This record keeping (C.iii.) is not required for resins that do not contain a vapor suppressant.

- D. The owner or operator shall properly operate and maintain equipment to monitor the differential pressure drop across the Dry Filter (CE-101). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

The owner or operator shall monitor the Dry Filter (CE-101) in the following way:

- i. Upon installation of the dry filters, the owner or operator shall collect and record the pressure drop across the Dry Filter (CE-101), in inches of water and shall record the date of the measurement. This initial pressure drop shall be recorded as the Pressure Drop Baseline (PDB).
  - ii. The owner or operator shall then collect and record the pressure drop across the Dry Filter (CE-101), in inches of water, at least once per day. This requirement shall not apply on the days the Dry Filter (CE-101) is not in operation. If the pressure drop in inches of water across the Dry Filter (CE-101) is greater than the total of the PDB plus 0.5 inch (inches of water), the owner or operator shall investigate the Dry Filter (CE-101) and make corrections to it or shall replace the filters.
  - iii. Whenever the dry filters are replaced, the owner or operator shall re-establish the Pressure Drop Baseline (PDB). The owner or operator shall record the date the filters are replaced and the new PDB. It shall then resume daily monitoring as required by Condition 5.D.ii.
- E. The owner or operator shall develop an operating and maintenance plan for the Dry Filters (CE-101), including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routing and long-term maintenance.
  - i. The owner or operator shall maintain a record of all inspections and maintenance and any action resulting from the inspection and maintenance of the Dry Filter (CE-101).
  - ii. The owner or operator shall maintain a record when the filters are changed.
- F. The owner or operator shall keep records on the identification, the organic HAP content, and the VOC content of each VOC or HAP-containing material using in the following emission units: Spraying of Vinyl Ester Resin (EU-101), Spraying of Polyester Resin (EU-102), and Spa Assembly (EU-104). The VOC and organic HAP content records may be based on SDS or on resin specifications supplied by the resin supplier. The organic HAP content shall be determined in accordance with §63.5797.
  - i. The facility shall maintain a copy of the Safety Data Sheets (SDS) or a supplier data sheet for each material that contains a VOC or a HAP.
- G. The clean-up solvent used in the First Laminate Station (EU-101) and the Second Laminate Station (EU-102) and Spa Assembly (EU-104) shall not contain any VOC or HAP.

- i. The owner or operator shall maintain records on the identification of the clean-up solvents used in the First Laminate Station (EU-101), the Second Laminate Station (EU-102) and Spa Assembly (EU-104).
- H. The total application of resin applied in the First Laminate Station (EU-101) and the Second Laminate Station (EU-102) shall not exceed 575 pounds per hour based on a daily average.
  - i. The owner or operator shall maintain the following daily records on resin application in the First Laminate Station (EU-101) and the Second Laminate Station (EU-102):
    - a) Total amount of resin spray applied (pounds);
    - b) The number of hours that the spray booth was in operation; and
    - c) The average amount of resin sprayed per hour.

Monitoring and Recordkeeping for the VOC Emission Cap:

- I. The owner or operator shall keep a description of each VOC-containing material used in the Vinyl Ester Resin Spray and Cure (EU-101), Polyester Resin Spray and Cure (EU-102), and Spa Assembly Operations (EU-104). The description shall include the type of material (e.g. resin, catalyst, sealant, etc).
- J. The owner or operator shall maintain the following daily records to show compliance with the VOC ton per year emission limit in Condition 1 of the permits:
  - i. The identification and the amount in pounds of each VOC-containing material (resin, adhesive, catalyst, sealant, cleaning chemicals, etc.) used in Vinyl Ester Resin Spray and Cure (EU-101), Polyester Resin Spray and Cure (EU-102), and Spa Assembly Operations (EU-104). For the purpose of calculating emissions, all materials may be considered emitted on the day that they are delivered to the plant or are removed from storage.
- K. The owner or operator shall keep the following monthly records on the Vinyl Ester Resin Spray and Cure (EU-101), Polyester Resin Spray and Cure (EU-102), and Spa Assembly Operations (EU-104):
  - i. The identification of each VOC-containing material used;
  - ii. The amount, either in gallons or pounds, of each VOC-containing material used;
  - iii. The amount of VOC emissions (pound or tons) for each material;
  - iv. The total amount of VOC emissions (tons) from all materials used; and
  - v. The 12-month rolling total of the amount of VOC emissions (tons) from all materials used.

The owner or operator shall complete these monthly records by the 30<sup>th</sup> day following the end of the previous month.

L. If the 12-month rolling total of the VOC emissions from the Vinyl Ester Resin Spray and Cure (EU-101), Polyester Resin Spray and Cure (EU-102), and Spa Assembly Operations (EU-104) exceeds 109.0 tons, the owner or operator shall keep the following daily records on the emission units:

- i. The amount of VOC emissions (tons);
- ii. The 365-day rolling total of the amount of VOC emissions (tons);

Daily calculation for VOC emissions shall continue until the 365-day rolling total of the amount of VOC emissions from these emission units drops below 109.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculations of VOC emission will cease per Condition L. of this permit. If the emissions once again exceed 109.0 tons, daily recordkeeping will be required per Condition L. of this permit.

M. The owner or operator shall calculate VOC emissions from the Vinyl Ester Resin Spray and Cure (EU-101) and the Polyester Resin Spray and Cure (EU-102) according to the following methods:

i. Resin Spray and Cure:

VOC emissions shall be determined by multiplying the amount of resin used in tons by the appropriate emission factors (lbs/ton) from Table 1 to Subpart WWWW for open molding and then dividing by 2000. These emission factors shall also be used to calculate HAP emissions. For any VOC in the resin that is not a HAP (e.g. alpha methyl styrene), the owner or operator shall use the same equation from Table 1 as is used to estimate HAP emissions.

- a) For each resin, the owner or operator shall maintain a record of the applicable equation from Table 1 to Subpart WWWW that is used to estimate HAP and VOC emissions.
- b) For each resin that contains a vapor suppressant (vapor suppressed resin), the owner or operator shall maintain a record of the vapor suppressant effectiveness (VSE) factor and the test documentation on how the VSE factor was determined.

ii. Catalyst:

- a) VOC emissions shall be determined by multiplying the amount of catalyst used in tons (or pounds) by the amount of Methyl Ethyl Ketone (percent by weight) in the catalyst plus 0.5%.
- b) If the catalyst contains Dimethyl Phthalate (DMP), VOC emissions shall be determined by multiplying the amount of DMP in the catalyst by an emission factor of 0.0112 lb VOC/lb of DMP used. This is based on the following study, "Emission Factors for Liquid Organic Peroxide Catalysts used in the Open Molding of Composites," Haberlein, March 24, 1999.

Monitoring and Recordkeeping for the HAP Emission Cap for open molding:

- N. The owner or operator shall maintain the following daily records to show compliance with the HAP ton per year emission limit in Condition 1 of the permits:
- i. The identification and the amount in pounds of each HAP-containing resin used in Vinyl Ester Resin Spray and Cure (EU-101) and the Polyester Resin Spray and Cure (EU-102). For the purpose of calculating emissions, all materials may be considered emitted on the day that they are delivered to the plant or are removed from storage.
- O. The owner or operator shall keep the following monthly records on the Vinyl Ester Resin Spray and Cure (EU-101), and the Polyester Resin Spray and Cure (EU-102).
- i. The identification of each HAP-containing resin used;
  - ii. The amount, either in pounds, of each HAP-containing resin used;
  - iii. The amount of organic HAP emissions (tons) from each resin used;
  - iv. The total amount of organic HAP emissions (tons) from all resins used; and
  - v. The 12-month rolling total of the amount of organic HAP emissions (tons);

The owner or operator shall complete these monthly records by the 30<sup>th</sup> day following the end of the previous month.

- P. The owner or operator shall calculate HAP emissions from the Vinyl Ester Resin Spray and Cure (EU-101) and the Polyester Resin Spray and Cure (EU-102) according to the following methods:
- i. Resin Spray and Cure: HAP emissions shall be determined by multiplying the amount of resin used in tons by the appropriate emission factors (lbs/ton) from Table 1 to Subpart WWWW for open molding and then dividing by 2000.
    - a) For each resin, the owner or operator shall maintain a record of the applicable equation from Table 1 to Subpart WWWW that is used to estimate HAP and VOC emissions.
    - b) For each resin that contains a vapor suppressant (vapor suppressed resin), the owner or operator shall maintain a record of the vapor suppressant effectiveness (VSE) factor and the test documentation on how the VSE factor was determined.
    - c) The percent HAP used in the equations is the total weight percent of organic HAP in the resin prior to the addition of fillers, catalyst, and promoters.

Requirements from NESHAP Subpart WWWW:

- Q. The owner or operator shall comply with all applicable requirements from 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production. In accordance with Table 2 to Subpart WWWW, the facility must comply with the emission standards and work practices standards upon startup.
- i. In accordance with §63.5905, *Notifications*, and Table 13 to Subpart WWWW, the owner or operator shall submit to the Department a Notification of Compliance Status no later than 30 calendar days after the facility's compliance date.
- R. As specified in §63.5835(c), the owner or operator shall always operate and maintain the affected sources, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i).
- S. As specified in §63.5805(c), the owner or operator must meet each organic HAP emission limit in Table 3 of Subpart WWWW of Part 63 that applies to the affected sources covered under this permit. The emission limit for open molding mechanical application using a non-corrosion-resistant or non-high strength resin is 88 pounds organic HAP per ton of resin, based on a 12-month rolling average. The emission limit for open molding mechanical application using a corrosion-resistant or high strength resin is 113 pounds organic HAP per ton of resin, based on a 12-month rolling average.
- T. The owner or operator shall follow one of the methods from §63.5810, *Options for Meeting Standards for Open Molding*, in order to demonstrate compliance with the organic HAP limits from Table 3 to Subpart WWWW of Part 63. The owner or operator shall maintain a record of the applicable emission limit and which compliance option from Subpart WWWW is being used for the Vinyl Ester Resin Spray and Cure (EU-101), Polyester Resin Spray and Cure (EU-102). At the time of permit issuance, the owner or operator is using §63.5810(a), *Compliant Resin with Emission Reduction Techniques*. The facility is allowed to change compliance options for Subpart WWWW; however, the owner or operator shall notify the Iowa DNR – Air Quality Bureau and DNR Field Office 6 in a compliance report if the compliance option has changed.
- U. As specified in §63.5805(c), the owner or operator must be in compliance at all times with the following work practice standards from Table 4 of Subpart WWWW of Part 63:
- i. The owner or operator may not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
  - ii. The owner or operator must keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

- iii. Mixers used to blend or agitate HAP-containing materials in vessels larger than 5.0 gallons shall meet the following requirements:
  - a) A cover shall be used on the mixer with no visible gaps, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;
  - b) The mixer vents shall be kept closed when actual mixing is occurring except that venting is allowed during the addition of materials or as necessary prior to adding materials or opening the cover for safety; and
  - c) The mixer covers shall be closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
- V. The owner or operator shall submit all notifications required by Table 13 of Subpart WWWW of Part 63.
- W. The owner or operator shall submit all reports required by Table 14 of Subpart WWWW of Part 63.
- X. The owner or operator shall retain records in accordance with §63.5915. Records required by Subpart WWWW of Part 63 must be retained for a minimum of five years.

Authority for Requirement: DNR Construction Permits 22-A-051, 22-A-052, and 22-A-053

**Emission Point Characteristics**

*This emission points shall conform to the specifications listed below:*

<b>Emission Point Number</b>	<b>Stack Height, Feet</b>	<b>Discharge Style</b>	<b>Stack Opening, inches</b>	<b>Stack Temperature, °F</b>	<b>Exhaust Flowrate, SCFM</b>
EP-101	27 Feet	Vertical, unobstructed	36 inches	Ambient	25,000 scfm
EP-102	27 Feet	Vertical, unobstructed	36 inches	Ambient	25,000 scfm
EP-103	27 Feet	Vertical, unobstructed	36 inches	Ambient	25,000 scfm

Authority for Requirement: DNR Construction Permits 22-A-051, 22-A-052, and 22-A-053

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

**Agency Approved Operation & Maintenance Plan Required?**      Yes  No

**Facility Maintained Operation & Maintenance Plan Required?**      Yes  No

**Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)



# Compliance Assessment Monitoring (CAM) Plan

## American Bath Group (ABG) Ottumwa, Iowa

### Vinyl Ester and Poly Ester Resin Spray Booth Dry Filter Bank (CE-101)

#### I. Background

##### Emissions Unit

Description: Dry Filter Bank for Vinyl Ester and Poly Ester Resin Spray Booth  
Identification: Emission Points 101, 102, and 103  
Facility: American Bath Group  
Ottumwa, Iowa

##### Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.: Permit  
Permit Emission Limit: Particulate Matter (PM)  
3.3 lb/hr  
Monitoring Requirement: Visible emissions  
Daily Pressure Drop across Dry Filter  
Monthly and Semi-Annual Maintenance, detailed in  
Operation and Maintenance Plan

#### II. Monitoring Approach

##### Indicator

Daily “no visible emission” checks and daily pressure drop readings across the Dry Filter (CE-101) will be used as indicators.

##### Performance Criteria

1. Observation consistency: Visible emission checks will be performed by trained maintenance personnel.
2. QA / QC practice: The differential pressure gauge will be checked daily against the pressure drop baseline in accordance with existing operation and maintenance procedures.
3. Monitoring frequency and collection procedure: All observations will be recorded daily on control device inspection sheets that indicate the name of the observing employee, the date, the time, and the results of the observation.

### **III. Justification**

#### Background

This is a fiberglass reinforced plastics manufacturing facility. The emission units have potential pre-control particulate matter emissions greater than the major source amount which is controlled by a bank of dry filters in the spray booth. Approximately 75,000 CFM of air from the spray booth will be filtered.

#### Rationale for selection of performance indicator

Visible emissions was selected as an indicator because it indicates the proper operation and maintenance of the dry filters. If operating properly, there will be little to no visible emissions from the exhaust stacks. Any increase in visible emissions indicates the filters need maintenance.

Pressure drop monitoring was selected as an indicator because it indicates whether the filters are becoming blinded (high pressure drop) or if the filters are developing leaks (low pressure drop). Both conditions require maintenance, inspections, and corrective actions.

#### Measurement approach

Visible emissions from the collector exhaust stack will be monitored daily during operations by Visible emission checks will be performed by trained maintenance personnel. A Method 9 reading will be performed within 4 hours of an initial observation of visible emissions.

Pressure drop will be recorded by maintenance personnel.

#### Indicator range

No visible emissions are considered acceptable. Pressure drop within the range of 0.5" inches of water column are acceptable. Performance testing will not be required to determine the appropriateness of the established collector pressure drop range. Adequate capture of the controlled emission sources and observation of no visible emissions indicate the pressure drop range is appropriate.

### Corrective Action Threshold

Upon installation of the dry filters, the owner recorded the pressure drop across the Dry Filter (CE-101), in inches of water, as the “Pressure Drop Baseline” (PDB).

ABG records the pressure drop across the Dry Filter (CE-101), in inches of water, at least once per day (except on days the Dry Filter (CE-101) is not in operation). If the pressure drop in inches of water across the Dry Filter (CE-101) is greater than the total of the PDB plus 0.5 inch (inches of water), ABG will investigate the Dry Filter (CE-101) and make corrections to it or will replace the filters.

## Emission Point ID Number: EP-104 (Internally Vented)

### Associated Equipment

Emission Point Number	Emission Unit Number	Emission Unit Description	Maximum Design Capacity	Control Equipment Description	DNR Construction Permit Number
EP-104	EU-104	Assembly Operations for Spa Manufacturing	30 spas per day	None	22-A-081

### Applicable Requirements

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The following combined emission limits shall not be exceeded for the following emission points:

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 145.0 tons/yr<sup>(1)</sup>

Authority for Requirement: DNR Construction Permits 22-A-051, 22-A-052, and 22-A-081

- (1) This limit applies to the following emission units: Spraying of Vinyl Ester Resin (EU-101), Spraying of Polyester Resin (EU-102) and Spa Assembly (EU-104).

#### Operating Requirements with Associated Monitoring and Recordkeeping

*All records as required by these permits shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping requirements for these permits shall be:*

#### General Operating Limits, Monitoring and Recordkeeping Requirements:

- A. The owner or operator shall keep records on the identification, the organic HAP content, and the VOC content of each VOC or HAP-containing material using in the following emission units: Spraying of Vinyl Ester Resin (EU-101), Spraying of Polyester Resin (EU-102), and Spa Assembly (EU-104). The VOC and organic HAP content records may be based on SDS or on resin specifications supplied by the resin supplier. The organic HAP content shall be determined in accordance with §63.5797.
- i. The facility shall maintain a copy of the Safety Data Sheets (SDS) or a supplier data sheet for each material that contains a VOC or a HAP.

#### Monitoring and Recordkeeping for the VOC Emission Cap:

- B. The owner or operator shall keep a description of each VOC-containing material used in the Vinyl Ester Resin Spray and Cure (EU-101), Polyester Resin Spray and Cure (EU-102), and Spa Assembly Operations (EU-104). The description shall include the type of material (e.g. resin, catalyst, sealant, etc).

- C. The owner or operator shall maintain the following daily records to show compliance with the VOC ton per year emission limit in Condition 1 of the permit:
- i. The identification and the amount in pounds of each VOC-containing material (resin, adhesive, catalyst, sealant, cleaning chemicals, etc.) used in Vinyl Ester Resin Spray and Cure (EU-101), Polyester Resin Spray and Cure (EU-102), and Spa Assembly Operations (EU-104). For the purpose of calculating emissions, all materials may be considered emitted on the day that they are delivered to the plant or are removed from storage.
- D. The owner or operator shall keep the following monthly records on the Vinyl Ester Resin Spray and Cure (EU-101), Polyester Resin Spray and Cure (EU-102), and Spa Assembly Operations (EU-104):
- i. The identification of each VOC-containing material used;
  - ii. The amount, either in gallons or pounds, of each VOC-containing material used;
  - iii. The amount of VOC emissions (pounds or tons) for each material;
  - iv. The total amount of VOC emissions (tons) from all materials used; and
  - v. The 12-month rolling total of the amount of VOC emissions (tons) from all materials used;

The owner or operator shall complete these monthly records by the 30<sup>th</sup> day following the end of the previous month.

- E. If the 12-month rolling total of the VOC emissions from the Vinyl Ester Resin Spray and Cure (EU-101), Polyester Resin Spray and Cure (EU-102), and Spa Assembly Operations (EU-104) exceeds 109.0 tons, the owner or operator shall keep the following daily records on the emission units:
- i. The amount of VOC emissions (tons);
  - ii. The 365-day rolling total of the amount of VOC emissions (tons);

Daily calculation for VOC emissions shall continue until the 365-day rolling total of the amount of VOC emissions from these emission units drops below 109.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculations of VOC emission will cease per Condition E. of this permit. If the emissions once again exceed 109.0 tons, daily recordkeeping will be required per Condition E. of this permit.

- F. The owner of operator shall calculate VOC emissions from the Spa Assembly Operations (EU-104) according to the following methods:
- i. VOC emissions from the use of chemicals for the two-part polyurethane foam shall be based on the equations developed in the “MDI/Polymeric MDI Emissions Reporting Guidelines for Polyurethane Industry,” written by the Alliance for Polyurethanes Industry. Prior to using other chemicals to apply a foam, the owner or operator shall modify this construction permit or receive a determination from the Department that a permit modification is not required.

- ii. VOC emissions from the use of the Plexus MA8110 adhesive for cabinet assembly shall be based on a loss factor of 0.024-pound VOC per gallon of adhesive. This is based on October 15, 2019 letter from the manufacturer of the adhesive, ITW Performance Polymers. Prior to using a different adhesive for cabinet assembly, the owner or operator shall modify this construction permit or receive a determination from the Department that a permit modification is not required. Alternatively, VOC emissions can be based on 100% of the VOC contained in the adhesive as being released into the air.
- iii. VOC emissions from all other VOC-containing material (e.g. sealant, primer, glue, cleaning solvents) used in the Spa Assembly Operation (EU-104) shall be based on 100% of the VOC contained in the material as being released into the air.

The owner or operator shall retain on file a record of any equations used to estimate VOC emissions or supplier’s documentation concerning VOC emissions from materials used.

**Emission Point Characteristics**

*This emission points shall conform to the specifications listed below:*

- Stack Height (feet from the ground): \*
- Discharge Style: \*
- Stack Outlet Dimensions (inches): \*
- Exhaust Temperature (°F): \*
- Exhaust Flowrate (scfm): \*
- Authority for Requirement: DNR Construction Permit 22-A-081

\* There is no stack on this emission unit. Assembly operations are located inside a building. VOC emissions are released into the building and then into ambient air through windows, doors, and building openings.

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

**Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.*

- Agency Approved Operation & Maintenance Plan Required?**      Yes  No
- Facility Maintained Operation & Maintenance Plan Required?**      Yes  No
- Compliance Assurance Monitoring (CAM) Plan Required?**      Yes  No

Authority for Requirement: 567 IAC 22.108(3)

## 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**

1. 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**

1. 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**

1. 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**

1. 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:
  - a. 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;
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
  - c. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
  - d. 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**

1. 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**

1. The owner or operator of any air emission source or control equipment shall:
  - a. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
  - b. Remedy any cause of excess emissions in an expeditious manner.
  - c. 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.
  - d. 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.**

1. 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.
  - a. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:
    - i. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 22;
    - ii. Compliance test methods specified in 567 Chapter 25; or
    - iii. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.
  - b. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
    - i. Any monitoring or testing methods provided in these rules; or
    - ii. 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**

1. 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**

1. 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.
4. 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**

- 1. 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**

- 1. 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.
- a. 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.
  - b. 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**

- 1. 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**

- 1. 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**

- 1. 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**

1. 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**

1. 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**

1. The permit does not convey any property rights of any sort, or any exclusive privilege. *567 IAC 22.108 (9)"d"*

**G28. Transferability**

1. 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**

1. 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**

1. 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.
2. 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 9<sup>th</sup> St.  
Des Moines, IA 50319-0034  
(515) 725-9545
3. 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**

1. 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**

1. 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
2. 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 9<sup>th</sup> St.  
Des Moines, IA 50319-0034  
(515) 725-8200
3. 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 9<sup>th</sup> 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 6<sup>th</sup> Street SE  
Cedar Rapids, IA 52401  
(319) 892-6000

## V. Appendix A

Link to NESHAP WWW standard:

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-WWWW>