



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
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DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

December 15, 2014

«FirstName» «LastName», «Title»
«FacilityName»
«MailingAddress»
«MailingAddress2»
«City», «State» «Zip»

Re: REMINDER – 2014 Title V Emissions Inventory and other Title V Reporting Requirements
EIQ #: «EIQ\_No», Facility #: «Facility\_No»

Dear «Greeting» «LastName»:

This letter is to remind you of the upcoming 2014 Title V Emissions Inventory and several other reporting requirements due for facilities subject to Title V of the Clean Air Act. Please note that your facility may have additional reporting requirements not listed below.

Table with 2 columns: Title V Report, Due Date. Rows include Title V Emissions Inventory (March 31, 2015), Title V Fee Payment (July 1, 2015), Annual Compliance Certification (\*March 31, 2015), and Semi-Annual Monitoring Report (\*March 31, 2015 & \*\*September 30, 2015).

\* Required only if your initial Title V permit was issued prior to January 1, 2015.
\*\* Required only if your initial Title V permit was issued prior to July 1, 2015.

Similar to the last four years, the Iowa Department of Natural Resources is not requiring reporting of greenhouse gas (GHG) emissions for 2014. However, some industrial sectors and facilities that in general emit 25,000 metric tons or more of CO2 equivalent GHG emissions per year are required to submit annual reports to EPA. Please visit http://www.epa.gov/ghgreporting/index.html to determine if your facility is subject to the federal GHG reporting program.

Two copies of Forms 1.0, 4.0, 5.0, Part 3, and supporting calculations are required for Title V emissions inventory reports. If your facility is located in Linn or Polk County, one additional copy must be sent to the corresponding county directly. Please refer to the enclosed FAQ for additional information and contact the following DNR staff if you have questions regarding various reporting requirements.

Table with 3 columns: Report, Contact, Contact Phone No. Rows include Title V Emissions Inventory or Fee Payment (Weston Li or Chris Kjellmark), and Annual Compliance Certification Semi-Annual Monitoring Report (Dennis Thielen).

Sincerely,

Lori Hanson
Supervisor, Air Operating Permits Section

Enclosure: Title V Emissions Inventory FAQ

# Title V Emissions Inventory FAQ

## When is the emissions inventory due?

It must be post-marked by March 31.

## What forms are required?

Forms 1.0, 4.0, 5.0, Part 3, and supporting calculations.

Note: only the bottom section of Part 3 needs to be signed - "Certification of Truth, Accuracy and Completeness"

## Where can I get the forms and instructions?

The forms can be downloaded from

<http://www.iowadnr.gov/InsideDNR/RegulatoryAir/OperatingPermits/InventoryFeePayment.aspx>. To request a paper copy call (515) 725-9580.

## How many copies should be submitted?

Two. If your facility is located in Linn or Polk County, one additional copy must be sent directly to the corresponding county.

## Where do I send the emissions inventory?

Attention: Title V Emissions Inventory  
Iowa DNR, Air Quality Bureau  
7900 Hickman Road, Suite 1  
Windsor Heights, IA 50324

## Have any of the inventory forms changed since last year?

No.

## Do I report greenhouse gas (GHG) emissions to DNR?

No, but you may need to report to EPA. Similar to the last four years, the DNR is not requiring reporting of GHG for 2014. However, some industrial sectors and facilities that in general emit 25,000 metric tons or more of CO<sub>2</sub> equivalent GHG emissions per year are required to submit annual reports to EPA. Please visit <http://www.epa.gov/ghgreporting/index.html> to determine if your facility is subject to the federal GHG reporting program.

## Can I submit my report electronically?

Yes. You may use the web version of the State Permitting and Reporting System (SPARS) to submit your emissions inventory electronically.

Please note that if you submit your inventory using SPARS Web, you do not need to mail hard copies to the DNR, Linn County, or Polk County.

If you wish to submit your emissions inventory electronically, but do not have access to SPARS Web, please contact Kevin Connolly at 515-725-9569 or [kevin.connolly@dnr.iowa.gov](mailto:kevin.connolly@dnr.iowa.gov). You can find more information about SPARS Web at <http://www.iowadnr.gov/InsideDNR/RegulatoryAir/SPARS.aspx>.

## When is the Title V fee payment due? Will I be notified of the fee rate?

Your payment must be post-marked by July 1. The Title V fee rate will be set in May by the Environmental Protection Commission. Your company will be notified in writing after the fee rate is set. The fee rate notification will also be posted at

<http://www.iowadnr.gov/InsideDNR/RegulatoryAir/OperatingPermits/InventoryFeePayment.aspx>.

## How should actual emissions be calculated?

Emission estimations should be based on, in the order of decreasing accuracy: continuous emission monitoring data, DNR-approved and site-specific stack test data, mass balance, or EPA approved emission factors. If none of these methods is available, an emission factor from a similar source with similar control equipment can be substituted, considering the characteristics of the material being processed or handled are similar.

## Do I need to submit Form CA-01 and other supporting documents with the inventory?

Yes, unless it is a straight forward calculation based on a widely available emission factor multiplied by a throughput. Otherwise, please include a Form CA-01 for each individual Form 4.0 to document how you arrived at certain calculated values. You may substitute this form with other documents, such as spreadsheets, as long as all the required information is included.

All the calculations, the parameters used in the calculations, and a description of any assumptions used in making the calculations must be clearly documented so that DNR staff can follow the calculations.

If the source of an emission factor is not a widely available source (such as WebFIRE, AP-42, etc.), a copy of the document must be submitted with the inventory. If emissions are calculated using program models (such as TANKS, LandGEM, etc.), the program outputs must be submitted with the inventory.

If the source of an emission factor is a stack test, please indicate the test date and the test method used and include a copy of the report summary. Do not submit the entire stack test report. The most recent and approved stack test should be used.

If more than one DNR-approved stack test was conducted for an emission point during the emissions inventory year, emissions should be estimated using each DNR-approved stack test result along with the throughput or operating data for the period of time after each stack test date(s). Example calculations are available at DNR website [http://www.iowadnr.gov/portals/idnr/uploads/air/insidednr/operpermit/seg\\_emiss\\_method.pdf](http://www.iowadnr.gov/portals/idnr/uploads/air/insidednr/operpermit/seg_emiss_method.pdf). If you have more

## Title V Emissions Inventory FAQ (Continued)

questions, please contact Nick Page at 515-725-9544 or [nick.page@dnr.iowa.gov](mailto:nick.page@dnr.iowa.gov).

### **Do I need to calculate emissions and pay fees for emissions from insignificant activities?**

No. According to subrule 567 IAC 22.106(7), fees are not required for insignificant activities.

### **Is there a de minimus level for reporting emissions?**

Yes. Emission totals reported on Form 4.0 only need to be reported to the nearest hundredth of a ton (### tons/yr). Emission totals greater than or equal to 0.005 tons/yr should be rounded up to the nearest hundredth of a ton, and reported on Form 4.0. Emission totals less than 0.005 tons/yr do not need to be reported.

### **Can I include just a total of all the hazardous air pollutants (HAPs) emitted on Forms 4.0 and 5.0, instead of reporting them separately?**

No. HAP emissions need to be listed separately on Forms 4.0 and 5.0, along with the appropriate CAS number.

### **How do I avoid double-counting HAP emissions for fee payment purpose?**

Most HAPs are also considered volatile organic compounds (VOC HAP) or particulate matter (PM HAP). For a listing of these, please visit the Operating Permits section's technical guidance documents at <http://www.iowadnr.gov/InsideDNR/RegulatoryAir/OperatingPermits/OpPermitsTechnicalGuide.aspx>. You are required to report the total for each HAP emitted on Forms 4.0 and 5.0. However, you are not required to pay fees twice for the same emissions.

If a HAP is also a VOC or PM<sub>10</sub>, do not include its emission value in the Emissions Subject to Fees column on page 2 of Form 5.0. Enter "0.00" instead.

If you submit your inventory in SPARS web, you need to add up all VOC HAP (and/or PM HAP), choose VOC HAP Total (and/or PM HAP Total) from the pollutant list, and enter the total as a negative number. Please refer to "Title V Emissions Inventory SPARS Web Manual" at <http://www.iowadnr.gov/InsideDNR/RegulatoryAir/SPARS/HelpInfo.aspx> for more instructions.

### **If I do not need to pay fees on PM<sub>2.5</sub>, total particulate matter, carbon monoxide, or ammonia emissions, then why do I need to report them on Forms 4.0 and 5.0?**

Although they are considered regulated pollutants, you are not required to pay fees on PM<sub>2.5</sub>, total particulate matter (PM), and carbon monoxide (CO) emissions. However, you are still required to report PM<sub>2.5</sub>, PM, and CO emissions on Forms 4.0 and 5.0 because many sources have applicable requirements for these pollutants. The DNR also uses the emissions for planning and inventory purposes (e.g. in the case of ammonia) and for meeting the National Emissions Inventory (NEI) reporting

requirements. Please note that fees are required for PM<sub>10</sub> emissions. Please also note that no fees are required for GHG emissions and do not include GHG emissions on Form 4.0 and Form 5.0.

### **Do I need to enter a source classification code (SCC) number on each Form 4.0?**

Yes. A valid SCC number should be entered on each Form 4.0. Do not use "99999999" because it is not a valid number for the NEI reports and it does not specify a process to which emissions can be categorized. For a list of valid point-source SCC numbers, please refer to the "Updated Source Classification Code (SCC)" list at <http://www.iowadnr.gov/InsideDNR/RegulatoryAir/EmissionsInventory/EmissionsEstimateTools.aspx>. If you have any questions regarding SCC numbers, please contact Nick Page at 515-725-9544 or [nick.page@dnr.iowa.gov](mailto:nick.page@dnr.iowa.gov).

### **Where can I find information about Factor Information Retrieval System (WebFIRE)?**

WebFIRE is the EPA's online database that contains emissions factors developed by the EPA for criteria pollutants and HAPs for industrial and non-industrial processes. You can assess the WebFire at <http://cfpub.epa.gov/webfire/>

### **Do I need to report primary, filterable, or condensable PM?**

Primary (sum of filterable and condensable) PM<sub>2.5</sub>, PM<sub>10</sub>, and PM emissions should be reported on Forms 4.0 and 5.0. DNR recognizes that some emission units may be subject to filterable PM emission limits from federal regulations. The compliance demonstration method will remain the same in these instances. However, for emissions inventory purposes, DNR is required to report primary PM<sub>2.5</sub> and PM<sub>10</sub> emissions to meet the NEI requirements.

### **Will DNR send another reminder as the deadline gets closer?**

Yes, as the March 31 deadline approaches, the DNR will send a reminder on the Air Quality Bureau's listserve. Directions for subscribing to the listserve are as follows:

#### **DNR Air Quality List Serve**

DNR's air list serve is targeted to the regulated public and consultants to deliver timely regulatory news, program updates, and technical guidance to your email.

To subscribe, send a blank email to:

[join-iairtech@lists.ia.gov](mailto:join-iairtech@lists.ia.gov)

The subject line is blank.

For more information, please contact the DNR's Wendy Walker at 515-725-9570 or [wendy.walker@dnr.iowa.gov](mailto:wendy.walker@dnr.iowa.gov).