

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

**Name of Permitted Facility: John Deere Ottumwa Works**  
**Facility Location: 928 East Vine Street, Ottumwa, IA 52501**  
**Air Quality Operating Permit Number: 03-TV-028R1-M001**  
**Expiration Date: June 28, 2014**  
**Permit Renewal Application Deadline: December 28, 2013**

**EIQ Number: 92-1316**  
**Facility File Number: 90-01-003**

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**Responsible Official**

**Name: Andrew Hansen**  
**Title: Facility Manager**  
**Mailing Address: 928 East Vine Street, Ottumwa, IA 52501**  
**Phone #: (641) 683-2490**

**Permit Contact Person for the Facility**

**Name: Tim Trumbull**  
**Title: Environmental Engineer**  
**Mailing Address: 928 East Vine Street, Ottumwa, IA 52501**  
**Phone #: (641) 683-2466**

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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**

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Douglas A. Campbell, Supervisor of Air Operating Permits Section

Date

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## Abbreviations

acfm.....	actual cubic feet per minute
CFR.....	Code of Federal Regulation
CE .....	control equipment
CEM.....	continuous emission monitor
°F.....	degrees Fahrenheit
EIQ.....	emissions inventory questionnaire
EP.....	emission point
EU .....	emission unit
gal/hr .....	gallons per hour
gr./dscf .....	grains per dry standard cubic foot
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
SCC .....	Source Classification Codes
PSD .....	Prevention of Significant Deterioration
scfm.....	standard cubic feet per minute
SIC .....	Standard Industrial Classification
TPY.....	Tons per year
USEPA.....	United States Environmental Protection Agency

### Pollutants

PM.....	particulate matter
PM <sub>10</sub> .....	particulate matter ten microns or 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: John Deere Ottumwa Works

Permit Number: 03-TV-028R1-M001

Facility Description: Manufacture of Farm Machinery and Equipment (SIC 3523)

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## Equipment List

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<b>Emission Point Number</b>	<b>Emission Unit Number(s)</b>	<b>Emission Unit Description</b>	<b>IDNR Construction Permit Number</b>
RIM MOLD/WAX 1	RIM MOLD/WAX 1	RIM Mold/Wax 1	02-A-151-S3
RIM MOLD/WAX 2	RIM MOLD/WAX 2	RIM MoldWax 2	02-A-152-S4
RIM OVEN 1	RIM OVEN 1	RIM Oven 1	02-A-149
EPC3PS-3-B	EUC3PSc	RIM Adhesive Booth	87-A-029-S3
EP RRHA	EU RRHA	RIM Holding Area	02-A-148
EP SC	EU SC	Storage Cabinet	02-A-272
C2PSCK	C2PSCK	C2-C10 Paint Kitchen	99-A-866-S1
	C2PSCK-2	C2-C10 Paint Kitchen	
EPC7PS-1-B	EUC7PS	C7 Paint System Booth	02-A-180-S2
EPC7PS-2-B			02-A-181-S2
EPC9PS-1-B	EUC9PS	C9 Paint System Booth	81-A-075-S4
EPC9PS-2-B			02-A-182-S3
EPC10W	EUC10W	C10 Wash System	01-A-1109
	EUC10D	C10 Wash Oven	
EPC12BO	EUC12BO	C12 Bake Oven	97-A-636-S2
EPC12PS-1B	EUC12PS	C12 Paint System Booth	94-A-263-S5
EPC12PS-2B			97-A-633-S4
EPC12PS-3B			97-A-634-S4
EPC12PS-4B			97-A-635-S4
EPE2	EUE2 Wash	E2 Wash System	02-A-016-S4
	EUE2 Oven	E2 Wash Oven	

**Equipment List (continued)**

<b>Emission Point Number</b>	<b>Emission Unit Number(s)</b>	<b>Emission Unit Description</b>	<b>IDNR Construction Permit Number</b>
EPE3P-1-O	EUE3PD	E3 Paint Dip Tanks (2 tanks)	96-A-439-S3
EPE3P-2-O			02-A-273-S2
EPE3P-3-O			02-A-274-S2
EPE3P-4-O			02-A-275-S2
EPE3P-5-O			02-A-276-S2
EPE3P-6-O			02-A-277-S2
EPE3PS-1B	EUE3PS1	E3 Paint Spray Booth	02-A-183-S2
EPE3PS-2B			02-A-184-S2
EPE3PS-3B			02-A-549-S2
EPE3PS-4B			02-A-550-S2
EPE4 Oven	EUE4 Oven	E4 Paint Line Oven	02-A-042
EPL4PS-1-B	EUL4PS	L4 Paint System Spray Booth	86-A-004-S5
EPL4PS-2-B			02-A-185-S4
EPL4PS-3-B			04-A-608-S2
EPWPR	EUWPR	Production Welding	Vents inside
EPMA	EUMA	Misc. Adhesive Usage	Vents inside
EPMPS	EUMPS	Misc. Paint Usage	Vents inside
EPC8EE	EUEEa	Engine Exhaust in C8	Exempt
EPL3EE-1	EUEEb	Engine Exhaust in L3	Exempt
EPL3EE-2	EUEEc	Engine Exhaust in L3	Exempt
EPL3EE-3	EUEEg	Engine Exhaust in L3	Exempt
EPL4EE-1	EUEEd	Engine Exhaust in L4	Exempt
EPL4EE-2	EUEEe	Engine Exhaust in L4	Exempt
EPM6EE	EUEEf	Engine Exhaust in M6	Exempt
EPMG	EUMG	Facility Space Heaters	Vents inside
EP-D14QT	EU-D14QT	Quench Tank	04-A-376-S2
C4PS1	C4	C4 Paint Booth	09-A-498
C4PS2			09-A-499
C4PS3			09-A-500
C4PS4			09-A-501

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### Insignificant Equipment List

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<b>Insignificant Emission Unit Number</b>	<b>Insignificant Emission Unit Description</b>
EPTC9D	Diesel Fuel Tank (1500 gallons)
EUTPWO	Waste Oil Tank (10,000 gallons)
EUTN1D	Diesel Fuel Tank (550 gallons)
EUTM3G	Gasoline Tank (515 gallons)
EUTW3S-1	Solvent Tank (A4330)(1000 gallons)
EUTW3S-3	Solvent Tank (A2039)(560 gallons)
LASERS	Laser cutters (12)
HY-GARD	Hy Gard Oil Tank (10,000 gallons)

## II. Plant-Wide Conditions

Facility Name: John Deere Ottumwa Works  
 Permit Number: 03-TV-028R1-M001

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

### Permit Duration

The term of this permit is: Five (5) years from permit issuance.

Commencing on: June 29, 2009

Ending on: June 28, 2014

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.

**Table 1 – IDNR Construction Permits Establishing Facility-Wide VOC and HAP Limits**

Emission Point Number	Emission Unit Number(s)	Emission Unit Description	IDNR Construction Permit Number
RIM MOLD/WAX 1	RIM MOLD/WAX 1	RIM Mold/Wax 1	02-A-151-S3
RIM MOLD/WAX 2	RIM MOLD/WAX 2	RIM Mold/Wax 2	02-A-152-S4
EPC3PS-3-B	EUC3PSc	RIM Adhesive Booth	87-A-029-S3
EPC7PS-1-B	EUC7PS	C7 Paint System Booth	02-A-180-S2
EPC7PS-2-B			02-A-181-S2
EPC9PS-1-B	EUC9PS	C9 Paint System Booth	81-A-075-S4
EPC9PS-2-B			02-A-182-S3
EPC12PS-1B	EUC12PS	C12 Paint System Booth	94-A-263-S5
EPC12PS-2B			97-A-633-S4
EPC12PS-3B			97-A-634-S4
EPC12PS-4B			97-A-635-S4
EPE3P-1-O	EUE3PD	E3 Paint Dip Tanks (2 tanks)	96-A-439-S3
EPE3P-2-O			02-A-273-S2
EPE3P-3-O			02-A-274-S2
EPE3P-4-O			02-A-275-S2
EPE3P-5-O			02-A-276-S2
EPE3P-6-O			02-A-277-S2

**Table 1 (continued)**

<b>Emission Point Number</b>	<b>Emission Unit Number(s)</b>	<b>Emission Unit Description</b>	<b>IDNR Construction Permit Number</b>
EPE3PS-1B	EUE3PS1	E3 Paint Spray Booth	02-A-183-S2
EPE3PS-2B			02-A-184-S2
EPE3PS-3B			02-A-549-S2
EPE3PS-4B			02-A-550-S2
EPL4PS-1-B	EUL4PS	L4 Paint System Spray Booth	86-A-004-S5
EPL4PS-2-B			02-A-185-S4
EPL4PS-3-B			04-A-608-S2
EP-D14QT	EU-D14QT	Quench Tank	04-A-376-S2
C4PS1	C4	C4 Paint Booth	09-A-498
C4PS2			09-A-499
C4PS3			09-A-500
C4PS4			09-A-501

**Facility Wide Emission Limits**

*The atmospheric emissions from the facility shall not exceed the following:*

Pollutant: VOC

Emission Limit(s): 245 tons per rolling 12-month period

Authority for Requirement: See Iowa DNR Construction Permits in Table 1

Pollutant: Hazardous Air Pollutants (Single)

Emission Limit(s): 9.4 tons per rolling 12-month period

Authority for Requirement: See Iowa DNR Construction Permits in Table 1

Pollutant: Hazardous Air Pollutants (Total)

Emission Limit(s): 24.4 tons per rolling 12-month period

Authority for Requirement: See Iowa DNR Construction Permits in Table 1

**Facility Wide Reporting & Record Keeping Requirements**

*All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.*

- A. If the rolling 12-month total of the facility wide VOC emissions exceeds 221 tons per year, the permittee shall maintain the following daily records:
  - i. The identification, the VOC content and the amount (gallons) of each material used in each emission unit represented by a construction permit in Table 1 in the Plant Wide Conditions.
  - ii. The total facility wide VOC emission rate.
  - iii. Beginning the first day after the total facility wide VOC emissions exceed 221 Tons per year, the rolling 365-day total of the facility wide VOC emission rate.
  - iv. The permittee may return to the required monthly record keeping when the rolling

365-day total of the facility wide VOC emissions is less than 221 tons per year. The monthly recordkeeping requirement will go back into effect beginning with the first calendar month after the day on which the facility wide VOC emissions are less than 221 tons.

B. If the rolling 12-month total of the facility wide individual HAP emissions exceeds 8.5 tons per year, the permittee shall maintain the following daily records:

- i. The identification of the individual HAP content and the amount (gallons) of each material used in each emission unit represented by a construction permit in Table 1 in the Plant Wide Conditions.
- ii. The total facility wide individual HAP emission rate.
- iii. Beginning the first day after the total facility wide individual HAP emissions exceed 8.5 Tons per year, the rolling 365-day total of the facility wide VOC emission rate.
- iv. The permittee may return to the required monthly record keeping when the rolling 365-day total of the facility wide individual HAP emissions are less than 8.5 tons per year. The monthly recordkeeping requirement will go back into effect beginning with the first calendar month after the day on which the facility wide individual HAP emissions are less than 8.5 tons.

C. If the rolling 12-month total of the facility wide total HAP emissions exceeds 22.0 tons per year, the permittee shall maintain the following daily record:

- i. The identification of the total HAP content and the amount (gallons) of each material used in each emission unit represented by a construction permit in Table 1 in the Plant Wide Conditions.
- ii. The total facility wide total HAP emission rate.
- iii. Beginning the first day after the total facility wide total HAP emissions exceed 22.0 Tons per year, the rolling 365-day total of the facility wide VOC emission rate.
- iv. The permittee may return to the required monthly record keeping when the rolling 365-day total of the facility wide total HAP emissions is less than 22.0 tons per year. The monthly recordkeeping requirement will go back into effect beginning with the first calendar month after the day on which the facility wide total HAP emissions are less than 22.0 tons.

D. The permittee shall submit deviation reports that identify all exceedances of the rolling 12-month emissions limitations for VOC and HAPs. The report shall be submitted no later than 30 days from the end of the month in which the exceedance occurred.

Authority for Requirement: See Iowa DNR Construction Permits in Table 1

E. For this facility to have a true facility-wide limit of 245 tpy, a single HAP limit of 9.4 tpy and a total HAP limit of 24.4 tpy, all sources that have the potential to emit VOC and HAP emissions must follow the record keeping requirements stated in the Facility Wide Reporting & Record Keeping Requirements letters A through D.

Authority for Requirement: 567 IAC 22.108(3)

## **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 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 - No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved public roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance, as defined in Iowa Code section 657.1, from becoming airborne. All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule. Reasonable precautions may include, but not limited to, the following procedures.

1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizers or limestone.
4. Covering at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.

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

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**Compliance Plan**

*The owner/operator shall comply with the applicable requirements listed below. The compliance status is based on information provided by the applicant.*

Unless otherwise noted in Section III of this permit, John Deere Ottumwa Works is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which become effective during the permit term, John Deere Ottumwa Works shall comply with such requirements in a timely manner.

Authority for Requirement: 567 IAC 22.108(15)

## **40 CFR Part 63, Subpart HHHHHH (6H)**

### **Applicability and Compliance**

This facility is of the source type affected under Subparts A (General Provisions, 40 CFR §63.1 – 40 CFR §63.15) and HHHHHH (6H) [National Emission Standards for Hazardous Air Pollutants Area Source Standards for Paint Stripping and Miscellaneous Surface Coating Operations, 40 CFR §63.11169 – 40 CFR §63.11180].

This subpart establishes standards for HAP emissions involved in, but not limited to spray application of coatings containing compounds of chromium, lead, manganese, nickel or cadmium which are collectively referred to as target HAP. You are subject to this subpart if you own or operate an area source and perform spray application of coatings that contain the target HAP, as defined in Sec. 63.11180, to a plastic and/or metal substrate. As defined in Sec. 63.11180 spray applied coatings do not include non-refillable aerosol containers. Coatings considered to contain a target HAP are those where an individual target HAP is an OSHA-defined carcinogen (chromium, lead, nickel and cadmium) and the concentration exceeds 0.1 % by mass or the coating contains any individual, non-carcinogenic target HAP (manganese) in excess of 1.0 % by mass.

If this source meets the applicability criteria described in Sec. 63.11170 of this subpart, the source would be considered existing. The compliance date for existing sources is January 10, 2011 per Sec. 63.11173(b)

### **General Compliance Requirements**

- All painters must be certified that they have received training on proper spray application, spray equipment setup, and spray equipment maintenance. At a minimum, training must address the following:
  - A list of all current personnel by name and job description who are required to be trained.
  - Hands-on and classroom instruction on spray gun equipment selection, set up, and operation.
  - Training on spray techniques designed to improve transfer efficiency.
  - Training on routine spray booth maintenance and filter selection, installation and maintenance.
  - Environmental compliance with respect to the Miscellaneous Surface Coating Operations Area Source NESHAP.
- All spray areas must be fitted with a filter technology demonstrated to achieve a 98% capture efficiency of paint overspray. This requirement does not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.
- All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure.
  - Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, four complete walls or complete side curtains, and be ventilated under negative pressure. However, fully enclosed spray booths equipped with door/opening seals and an automatic pressure balancing system may operate up to 0.05 inches water gauge positive pressure.
  - Spray booths and preparation stations used for coating miscellaneous parts or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so air is drawn into the booth. Booths may have openings for conveyors and parts that pass through the booth for finishing.

- Mobile ventilated enclosures used to perform spot repairs must enclose the surface around the area being coated so overspray is retained in the enclosure and directed to a filter (for overspray capture).
- ☑ All spray-applied coatings must use high-volume low-pressure (HVLP), air-assisted airless, airless, or electrostatic spray guns. An alternative application technology may be used if the spray gun manufacturer demonstrates it can achieve a transfer efficiency (TE) comparable to one of the application technologies identified above and written approval has been obtained from the Administrator.
- ☑ All spray gun cleaning must be done so that an atomized mist or spray of cleaning solvent/residual paint is not created outside the container used for collecting the cleaning solvent/residual paint. Spray gun cleaning may be accomplished by hand cleaning, use of an enclosed gun wash unit, or by flushing equipment with solvent (provided the solvent is not atomized outside the container used for solvent collection).

**Notifications, Reports and Records**

- A. Notifications – as defined in Section 63.11175
  - 1. Initial notification for existing affected facility – Due Jan.11, 2010 unless exempt from this subpart.
  - 2. Notification of compliance status – Due March 11, 2011 if you did not certify in the initial notification that your source is already in compliance.
- B. Reports – as defined in Section 63.11176
  - 1. Annual Notification of Changes.
- C. Records - as defined in Section 63.11177
 

Affected area sources must keep the following records to document compliance:

  - ☑ Training certification records for painters. These records must include the initial training date and the most recent refresher training date for each painter.
  - ☑ Filter efficiency documentation demonstrating that filters meet or exceed the 98% capture efficiency requirement.
  - ☑ When the facility uses something other than HVLP, air-assisted airless, airless, or electrostatic application equipment, spray gun manufacturer documentation stating the spray gun has been determined by the Administrator to achieve a TE equivalent to an HVLP spray gun.
  - ☑ Copies of any notifications and reports submitted to the Administrative Authority.
  - ☑ Records of any deviation from the requirements and corrective action documentation.

Authority for Requirement: 40 CFR Part 63 Subpart HHHHHH  
567 IAC 23.1(4)"eh"

### III. Emission Point-Specific Conditions

Facility Name: John Deere Ottumwa Works  
 Permit Number: **03-TV-028R1-M001**

#### Emission Point ID Numbers: RIM MOLD/WAX 1, RIM MOLD/WAX 2

#### Associated Equipment

**Table 1: Mold/Wax**

EP	EU	EU Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
RIM MOLD/WAX 1	RIM MOLD/WAX 1	RIM Mold/Wax 1	CE RIM M.1: Mat Filter	Prepolymer & Polyol	83.5 gal/hr	02-A-151-S3
				Wax	0.45 gal/hr	
RIM MOLD/WAX 2	RIM MOLD/WAX 2	RIM Mold/Wax 2	CE RIM M.2: Mat Filter	Prepolymer & Polyol	83.5 gal/hr	02-A-152-S4
				Wax	0.45 gal/hr	

#### Applicable Requirements

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

*The emissions from each emission point shall not exceed the levels specified below.*

Pollutant: Opacity

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

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Mold/Wax  
 567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedence of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 0.81 lb/hr<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Mold/Wax

<sup>(2)</sup> Total PM-10 allowed to be emitted from EP RIM MOLD/WAX 1 and EP RIM MOLD/WAX 2 combined.

Pollutant: Particulate Matter

Emission Limit(s): 0.01 gr/scf

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Mold/Wax  
 567 IAC 23.4(13)

Pollutant: VOC

Emission Limit(s): 245 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Single)

Emission Limit(s): 9.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Total)

Emission Limit(s): 24.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

### **Operational Limits & Requirements**

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

Process throughput:

1. Only one spray gun shall be operated to apply wax in RIM Mold/Wax 1 and RIM Mold/Wax 2.
2. The facility shall maintain its PSD minor source status for at least a three-year period after the issuance date of the applicable construction permit for this source.

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Mold/Wax

Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

A. The permittee shall maintain the following monthly records:

- i. The identification, the VOC content (percent by weight) and the amount (pounds) of each material used in the RIM operation. This shall include the polyurethane foam components and wax.
- ii. The monthly facility wide VOC emission rate
- iii. The rolling 12-month total of the facility wide VOC emissions.
- iv. The VOC, individual and total HAP content of each material used in the RIM operation.
- v. The monthly facility wide emission rate of each individual HAP from the facility.
- vi. The monthly emission rate of total HAPS from the facility.
- vii. The rolling 12-month total of each individual HAP from the facility, including fugitive HAP emissions.
- viii. The rolling 12-month total of the total HAPS emitted by the facility, including fugitive HAP emissions.

B. The rolling 12-month total of the facility wide VOC and HAP emissions shall be recorded as described in the plant-wide conditions.

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Mold/Wax

**Emission Point Characteristics**

*Each emission point shall conform to the specifications listed below.*

Stack Height (ft, from the ground): 20

Stack Opening (inches, dia): 24

Exhaust Flow Rate (scfm): 9,500

Exhaust Temperature (°F): 70

Discharge Style: Vertical Unobstructed

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Mold/Wax

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

**Monitoring Requirements**

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

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

**Weekly**

- Inspect the filter system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.
- Maintain a written record of the observation and any action resulting from the inspection.

**Record Keeping and Reporting**

Maintenance and inspection records will be kept for five years and available upon request.

**Quality Control**

- The filter equipment will be operated and maintained according to the manufacturer's recommendations.

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

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

Authority for Requirement: 567 IAC 22.108(3)

## Emission Point ID Number: RIM OVEN 1

### Associated Equipment

EU	EU Description	Control Equipment	Raw Material	Rated Capacity
RIM OVEN 1	RIM Oven 1	NA	Natural Gas	0.8 MMBtu/hr

### Applicable Requirements

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

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity

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

Authority for Requirement: Iowa DNR Construction Permit 02-A-149  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedence of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 0.01 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 02-A-149

Pollutant: Particulate Matter

Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: Iowa DNR Construction Permit 02-A-149  
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 500 ppmv

Authority for Requirement: Iowa DNR Construction Permit 02-A-149  
567 IAC 23.3(3)"e"

Pollutant: VOC

Emission Limit(s): 245 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Single)

Emission Limit(s): 9.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Total)

Emission Limit(s): 24.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

**Operational Limits & Requirements**

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

Process throughput:

- 1. The oven shall be fired by natural gas or liquefied petroleum gas only. The total heat input to the oven is 0.8 MMBTU/hr.

Authority for Requirement: Iowa DNR Construction Permit 02-A-149

Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

- 1. The construction permit does not require any recordkeeping for this emission unit.

Authority for Requirement: Iowa DNR Construction Permit 02-A-149

- 2. The Title V permit requires this unit to follow the reporting and record keeping requirements found in the Plant-Wide Conditions section of this permit.

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

Stack Height (ft, from the ground): 19

Stack Opening (inches, dia): 10

Exhaust Flow Rate (scfm): 2,300

Exhaust Temperature (°F): 250

Discharge Style: Vertical obstructed

Authority for Requirement: Iowa DNR Construction Permit 02-A-149

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

**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)

## Emission Point ID Numbers: EPC3PS-3-B, EP RRHA, EP SC

### Associated Equipment

**Table 1: RIM Adhesive Booth, Holding Area and Storage Cabinet**

EP	EU	EU Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EPC3PS-3-B	EUC3PSc	RIM Adhesive Booth	CEC3PSWa: Mat Filter	Adhesive	6.09 gal/hr	87-A-029-S3
EP RRHA	EU RRHA	RIM Holding Area	NA	Rims	NA	02-A-148
EP SC	EU SC	Storage Cabinet	NA	Adhesives/ Solvents	NA	02-A-272

### Applicable Requirements

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

*The emissions from EPC3PS-3-B shall not exceed the levels specified below (all VOC and HAP emissions for EP RRHA and EP SC are accounted for through EPC3PS-3-B).*

#### Limits for EP EPC3PS-3-B only

Pollutant: Opacity

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

Authority for Requirement: Iowa DNR Construction Permit 87-A-029-S3  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedence of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 0.61 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 87-A-029-S3

Pollutant: Particulate Matter

Emission Limit(s): 0.01 gr/scf

Authority for Requirement: Iowa DNR Construction Permit 87-A-029-S3  
567 IAC 23.4(13)

#### Limits for all EP in Table 1: RIM Adhesive Booth, Holding Area and Storage Cabinet

Pollutant: VOC

Emission Limit(s): 245 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Single)

Emission Limit(s): 9.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Total)

Emission Limit(s): 24.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

### **Operational Limits & Requirements**

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

Process throughput:

1. Only one spray gun may be used in the RIM adhesive spray booth at any one time.
2. The facility shall maintain its PSD minor source status for at least a three-year period after the issuance date of the applicable construction permit for this source.

Authority for Requirement: Iowa DNR Construction Permit 87-A-029-S3

Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

A. The permittee shall maintain the following monthly records:

- i. The identification and amount (gallons) of each coating and solvent, VOC, individual & total HAP content used in the RIM spray booth.
- ii. The monthly facility wide VOC emission rate
- iii. The rolling 12-month total of the facility wide VOC emissions.
- iv. The VOC, individual and total HAP content of each material used in the RIM operation.
- v. The monthly facility wide emission rate of each individual HAP from the facility.
- vi. The monthly emission rate of total HAPS from the facility.
- vii. The rolling 12-month total of each individual HAP from the facility, including fugitive HAP emissions.
- viii. The rolling 12-month total of the total HAPS emitted by the facility, including fugitive HAP emissions.

B. The rolling 12-month total of the facility wide VOC and HAP emissions shall be recorded as described in the plant-wide conditions.

Authority for Requirement: Iowa DNR Construction Permit 87-A-029-S3

**Emission Point Characteristics**

*Each emission point shall conform to the specifications listed below.*

<b>EP</b>	<b>Stack Height (ft, from the ground)</b>	<b>Stack Opening (inches)</b>	<b>Exhaust Flow Rate (scfm)</b>	<b>Exhaust Temp. (°F)</b>	<b>Discharge Style</b>	<b>Construction Permit</b>
EPC3PS-3-B	25.7	32 (diameter)	7,118	73	Vertical Unobstructed	87-A-029-S3
EP RRHA	13	38 x 38	8,000	70	Vertical, Unobstructed	02-A-148
EP SC	14	38 x 38	3,850	75	Horizontal	02-A-272

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

**Monitoring Requirements**

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

**Agency Approved Operation & Maintenance Plan Required? Yes  No**   
**Required for CEC3PSWa**

**Weekly**

- Inspect the paint booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.
- Maintain a written record of the observation and any action resulting from the inspection.

**Record Keeping and Reporting**

Maintenance and inspection records will be kept for five years and available upon request.

**Quality Control**

- The filter equipment will be operated and maintained according to the manufacturers recommendations.

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

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

Authority for Requirement: 567 IAC 22.108(3)

## **Emission Point ID Number: C2PSCK**

### Associated Equipment

Associated Emission Unit ID Numbers: C2PSCK and C2PSCK-2

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Emission Units vented through this Emission Point: C2PSCK and C2PSCK-2

Emission Unit Description: Paint Kitchens

Raw Material: Paint

Rated Capacity: NA

### **Applicable Requirements**

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

*The emissions from this emission point shall not exceed the levels specified below (VOC and HAP emissions from this emissions unit are accounted for in the permits for the spray booths).*

Pollutant: VOC

Emission Limit(s): 245 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Single)

Emission Limit(s): 9.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Total)

Emission Limit(s): 24.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

#### **Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

Stack Height (ft, from the ground): 40.5

Stack Opening (inches, dia): 12

Exhaust Flow Rate (scfm): 550

Exhaust Temperature (°F): 70

Discharge Style: Vertical, unobstructed

Authority for Requirement: Iowa DNR Construction Permit 99-A-866-S1

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

**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)

## Emission Point ID Numbers: EPC7PS-1-B, EPC7PS-2-B

### Associated Equipment

EP	EU	EU Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EPC7PS-1-B	EUC7PS	C7 Paint System Booth	CEC7PSWa: Mat Filter	Paint, Natural Gas	4.75 gal/hr, 2.75 MMBtu/hr	02-A-180-S2
EPC7PS-2-B			CEC7PSWb: Mat Filter			02-A-181-S2

### Applicable Requirements

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

*The emissions from these emission points shall not exceed the levels specified below.*

Pollutant: Opacity

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

Authority for Requirement: Iowa DNR Construction Permits 02-A-180-S2 & 02-A-181-S2  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedence of the indicator opacity of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 1.31 lb/hr

Authority for Requirement: Iowa DNR Construction Permits 02-A-180-S2 & 02-A-181-S2

Pollutant: Particulate Matter

Emission Limit(s): 0.01 gr/scf

Authority for Requirement: Iowa DNR Construction Permits 02-A-180-S2 & 02-A-181-S2  
567 IAC 23.4(13)

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 500 ppmv

Authority for Requirement: Iowa DNR Construction Permits 02-A-180-S2 & 02-A-181-S2  
567 IAC 23.3(3)"e"

Pollutant: VOC

Emission Limit(s): 245 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Single)

Emission Limit(s): 9.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Total)

Emission Limit(s): 24.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

### **Operational Limits & Requirements**

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

Process throughput:

1. The spray booth's air heater shall be fired by natural gas or liquefied petroleum gas only. The maximum heat input to the burner is 2.75 MMBTU/hr.
2. Only one spray gun may be used in spray booth C7 at any one time.
3. The facility shall maintain its PSD minor source status for at least a three-year period after the issuance date of the applicable construction permit for this source.

Control equipment parameters:

1. The owner or operator shall maintain the control equipment according to manufacturer's specifications and maintenance schedule.

Authority for Requirement: Iowa DNR Construction Permits 02-A-180-S2 & 02-A-181-S2

Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

A. The permittee shall maintain the following monthly records:

- i. The identification and amount (gallons) of each coating and solvent used in the paint spray booth.
- ii. The monthly facility wide VOC emission rate
- iii. The rolling 12-month total of the facility wide VOC emissions.
- iv. The VOC, individual and total HAP content of each material used in the spray booth.
- v. The monthly facility wide emission rate of each individual HAP from the facility.
- vi. The monthly emission rate of total HAPS from the facility.
- vii. The rolling 12-month total of each individual HAP from the facility, including fugitive HAP emissions.
- viii. The rolling 12-month total of the total HAPS emitted by the facility, including fugitive HAP emissions.

B. The rolling 12-month total of the facility wide VOC and HAP emissions shall be recorded as described in the plant-wide conditions.

C. The permittee shall maintain a record of all inspections/maintenance and any action resulting from the inspections/maintenance of the control equipment.

Authority for Requirement: Iowa DNR Construction Permits 02-A-180-S2 & 02-A-181-S2

**Emission Point Characteristics**

*Each emission point shall conform to the specifications listed below.*

Stack Height (ft. from the ground): 23.5

Stack Opening (inches, dia): 30

Exhaust Flow Rate (scfm): 15,289

Exhaust Temperature (°F): 73

Discharge Style: Vertical unobstructed

Authority for Requirement: Iowa DNR Construction Permits 02-A-180-S2 & 02-A-181-S2

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

**Monitoring Requirements**

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

**Agency Approved Operation & Maintenance Plan Required? Yes  No**   
**Required for CEC7PSWa and CEC7PSWb**

**Weekly**

- Inspect the paint booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.
- Maintain a written record of the observation and any action resulting from the inspection.

**Record Keeping and Reporting**

Maintenance and inspection records will be kept for five years and available upon request.

**Quality Control**

- The filter equipment will be operated and maintained according to the manufacturers recommendations.

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

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

Authority for Requirement: 567 IAC 22.108(3)

## Emission Point ID Numbers: EPC9PS-1-B, EPC9PS-2-B

### Associated Equipment

EP	EU	EU Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EPC9PS-1-B	EUC9PS	C9 Paint System Booth	CEC9PSWa: Mat Filter	Paint, Natural Gas	4.75 gal/hr, 3.00 MMBtu/hr	81-A-075-S4
EPC9PS-2-B			CEC9PSWb: Mat Filter			02-A-182-S3

### Applicable Requirements

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

*The emissions from these emission points shall not exceed the levels specified below.*

Pollutant: Opacity

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

Authority for Requirement: Iowa DNR Construction Permits 81-A-075-S4 & 02-A-182-S3  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedence of the indicator opacity of no visible emission will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 1.64 lb/hr

Authority for Requirement: Iowa DNR Construction Permits 81-A-075-S4 & 02-A-182-S3

Pollutant: Particulate Matter

Emission Limit(s): 0.01 gr/scf

Authority for Requirement: Iowa DNR Construction Permits 81-A-075-S4 & 02-A-182-S3  
567 IAC 23.4(13)

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 500 ppmv

Authority for Requirement: Iowa DNR Construction Permits 81-A-075-S4 & 02-A-182-S3  
567 IAC 23.3(3)"e"

Pollutant: VOC

Emission Limit(s): 245 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Single)

Emission Limit(s): 9.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Total)

Emission Limit(s): 24.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

### **Operational Limits & Requirements**

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

Process throughput:

1. A maximum of one spray gun shall be operated in paint booth C9, EUC9PS, at any one time.
2. The paint booth C9 air heater shall only be fired by natural gas or liquefied petroleum gas.
3. The facility shall maintain its PSD minor source status for at least a three-year period after the issuance date of the applicable construction permit for this source.

Control equipment parameters:

1. The owner or operator shall maintain the control equipment according to manufacturer's specifications and maintenance schedule.

Authority for Requirement: Iowa DNR Construction Permits 81-A-075-S4 & 02-A-182-S3

Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

A. The permittee shall maintain the following monthly records:

- i. The identification and amount (gallons) of each coating and solvent used in the paint spray booth.
- ii. The monthly facility wide VOC emission rate
- iii. The rolling 12-month total of the facility wide VOC emissions.
- iv. The VOC, individual and total HAP content of each material used in the spray booth.
- v. The monthly facility wide emission rate of each individual HAP from the facility.
- vi. The monthly emission rate of total HAPS from the facility.
- vii. The rolling 12-month total of each individual HAP from the facility, including fugitive HAP emissions.
- viii. The rolling 12-month total of the total HAPS emitted by the facility, including fugitive HAP emissions.

B. The rolling 12-month total of the facility wide VOC and HAP emissions shall be recorded as described in the plant-wide conditions.

C. The permittee shall maintain a record of all inspections/maintenance and any action resulting from the inspections/maintenance of the control equipment

Authority for Requirement: Iowa DNR Construction Permits 81-A-075-S4 & 02-A-182-S3

**Emission Point Characteristics**

*Each emission point shall conform to the specifications listed below.*

Stack Height (ft. from the ground): 27

Stack Opening (inches, dia): 36

Exhaust Flow Rate (scfm): 19,088

Exhaust Temperature (°F): 73

Discharge Style: Vertical unobstructed

Authority for Requirement: Iowa DNR Construction Permits 81-A-075-S4 & 02-A-182-S3

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

**Monitoring Requirements**

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

**Agency Approved Operation & Maintenance Plan Required? Yes  No**   
**Required for CEC9PSWa and CEC9PSWb**

**Weekly**

- Inspect the paint booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.
- Maintain a written record of the observation and any action resulting from the inspection.

**Record Keeping and Reporting**

Maintenance and inspection records will be kept for five years and available upon request.

**Quality Control**

- The filter equipment will be operated and maintained according to the manufacturers recommendations.

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

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

Authority for Requirement: 567 IAC 22.108(3)

## Emission Point ID Number: EPC10W

### Associated Equipment

EU	EU Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EUC10W	C10 Wash System	NA	Reagent	1.17 gal/hr	01-A-1109
EUC10D	C10 Wash Oven	NA	Natural Gas	7.25 MMBtu/hr	

### Applicable Requirements

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

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity

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

Authority for Requirement: Iowa DNR Construction Permit 01-A-1109  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedence of the indicator opacity of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter

Emission Limit(s): 2.37 lb/hr, 0.1 gr/dscf

Authority for Requirement: Iowa DNR Construction Permit 01-A-1109  
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 500 ppmv

Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: VOC

Emission Limit(s): 245 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Single)

Emission Limit(s): 9.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Total)

Emission Limit(s): 24.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

**Operational Limits & Requirements**

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

**Reporting & Record keeping:**

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

- 1. The construction permit does not require any recordkeeping for this emission unit.

Authority for Requirement: Iowa DNR Construction Permit 01-A-1109

- 2. The Title V permit requires this unit to follow the reporting and record keeping requirements found in the Plant-Wide Conditions section of this permit.

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

Stack Height (ft, from the ground): 41.5

Stack Opening (inches): 48 x 72

Exhaust Flow Rate (acfm): 53,000

Exhaust Temperature (°F): 98

Discharge Style: Vertical unobstructed

Authority for Requirement: Iowa DNR Construction Permit 01-A-1109

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

**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)

## Emission Point ID Number: EPC12BO

### Associated Equipment

EU	EU Description	Control Equipment	Raw Material	Rated Capacity
EUC12BO	C12 Bake Oven	NA	Natural Gas	8 MMBtu/hr

### Applicable Requirements

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

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity

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

Authority for Requirement: Iowa DNR Construction Permit 97-A-636-S2  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedence of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 0.076 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 97-A-636-S2

Pollutant: Particulate Matter

Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: Iowa DNR Construction Permit 97-A-636-S2  
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 500 ppmv

Authority for Requirement: Iowa DNR Construction Permit 97-A-636-S2  
567 IAC 23.3(3)"e"

Pollutant: VOC

Emission Limit(s): 245 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Single)

Emission Limit(s): 9.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Total)

Emission Limit(s): 24.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

### **Operational Limits & Requirements**

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

Process throughput:

1. The oven shall be fired by natural gas or liquefied petroleum gas only. The total heat input to the oven is 8.0 MMBTU/hr.

Authority for Requirement: Iowa DNR Construction Permit 97-A-636-S2

Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

1. The construction permit does not require any recordkeeping for this emission unit.

Authority for Requirement: Iowa DNR Construction Permit 97-A-636-S2

2. The Title V permit requires this unit to follow the reporting and record keeping requirements found in the Plant-Wide Conditions section of this permit.

Authority for Requirement: 567 IAC 22.108(3)

### **Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

Stack Height (ft, from the ground): 34

Stack Opening (inches, dia): 36

Exhaust Flow Rate (scfm): 10,300

Exhaust Temperature (°F): 160

Discharge Style: Vertical, obstructed

Authority for Requirement: Iowa DNR Construction Permit 97-A-636-S2

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

**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)

**Emission Point ID Numbers: EPC12PS-1B, EPC12PS-2B, EPC12PS-3B,  
EPC12PS-4B**

Associated Equipment

**Table 1: C12 Paint System**

<b>EP</b>	<b>EU</b>	<b>EU Description</b>	<b>Control Equipment</b>	<b>Raw Material</b>	<b>Rated Capacity</b>	<b>Construction Permit</b>
EPC12PS-1B	EUC12PS	C12 Paint System Booth	CEC12PSW: Waterwall	Paint, Natural Gas	38 gal/hr, 15 MMBtu/hr	94-A-263-S5
EPC12PS-2B						97-A-633-S4
EPC12PS-3B						97-A-634-S4
EPC12PS-4B						97-A-635-S4

**Applicable Requirements**

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

*The emissions from each emission point shall not exceed the levels specified below.*

All EP's

Pollutant: Opacity

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

Authority for Requirement: Iowa DNR Construction Permits in Table 1: C12 Paint System  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedence of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 500 ppmv

Authority for Requirement: Iowa DNR Construction Permits in Table 1: C12 Paint System  
567 IAC 23.3(3)"e"

Pollutant: VOC

Emission Limit(s): 245 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Single)

Emission Limit(s): 9.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Total)  
Emission Limit(s): 24.4 tons per rolling 12-month period (facility-wide)  
Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

EP's EPC12PS-1B & EPC12PS-4B

Pollutant: PM-10  
Emission Limit(s): 2.84 lb/hr  
Authority for Requirement: Iowa DNR Construction Permits 94-A-263-S5 & 97-A-635-S4

Pollutant: Particulate Matter  
Emission Limit(s): 2.84 lb/hr, 0.01 gr/scf  
Authority for Requirement: Iowa DNR Construction Permits 94-A-263-S5 & 97-A-635-S4  
567 IAC 23.4(13)

EP's EPC12PS-2B & EPC12PS-3B

Pollutant: PM-10  
Emission Limit(s): 2.47 lb/hr  
Authority for Requirement: Iowa DNR Construction Permits 97-A-633-S4 & 97-A-634-S4

Pollutant: Particulate Matter  
Emission Limit(s): 2.47 lb/hr, 0.01 gr/scf  
Authority for Requirement: Iowa DNR Construction Permits 97-A-633-S4 & 97-A-634-S4  
567 IAC 23.4(13)

**Operational Limits & Requirements**

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

Process throughput:

1. The spray booth's air heater shall be fired by natural gas or liquefied petroleum gas only. The maximum heat input to the burner is 15.0 MMBTU/hr.
2. A maximum of four (4) spray guns shall be operated in Paint Booth C12, EUC12PS, simultaneously at any one time.
3. The facility shall maintain its PSD minor source status for at least a three-year period after the issuance date of the applicable construction permit for this source.

Control equipment parameters:

1. The owner or operator shall maintain the control equipment according to manufacturer's specifications and maintenance schedule.

Authority for Requirement: Iowa DNR Construction Permits in Table 1: C12 Paint System

**Reporting & Record keeping:**

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

- A. The permittee shall maintain the following monthly records:
  - i. The identification and amount (gallons) of each coating and solvent used in the paint spray booth.
  - ii. The monthly facility wide VOC emission rate
  - iii. The rolling 12-month total of the facility wide VOC emissions.
  - iv. The VOC, individual and total HAP content of each material used in the spray booth.
  - v. The monthly facility wide emission rate of each individual HAP from the facility.
  - vi. The monthly emission rate of total HAPS from the facility.
  - vii. The rolling 12-month total of each individual HAP from the facility, including fugitive HAP emissions.
  - viii. The rolling 12-month total of the total HAPS emitted by the facility, including fugitive HAP emissions.
  
- B. The rolling 12-month total of the facility wide VOC and HAP emissions shall be recorded as described in the plant-wide conditions.
  
- C. The permittee shall maintain a record of all inspections/maintenance and any action resulting from the inspections/maintenance of the control equipment

Authority for Requirement: Iowa DNR Construction Permits in Table 1: C12 Paint System

**Emission Point Characteristics**

*Each emission point shall conform to the specifications listed below.*

<b>EP</b>	<b>Stack Height (ft, from the ground)</b>	<b>Stack Opening (inches, dia)</b>	<b>Exhaust Flow Rate (scfm)</b>	<b>Exhaust Temperature (°F)</b>	<b>Discharge Style</b>	<b>Construction Permit</b>
EPC12PS-1B	55	56	41,400	70	Vertical Unobstructed	94-A-263-S5
EPC12PS-2B	55	56	36,000	70	Vertical Unobstructed	97-A-633-S4
EPC12PS-3B	55	56	36,000	70	Vertical Unobstructed	97-A-634-S4
EPC12PS-4B	55	56	41,400	70	Vertical Unobstructed	97-A-635-S4

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

**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 Assurance Monitoring (CAM) Plan C12PSWa, C12PSWb, C12PSWc, C12PSWd Water Wall Scrubber

## Water Wall Scrubber Parameters

- Associated Emission Units: EUC12PS
- Associated Emission Points: C12PS1B, C12PS2B, C12PS3B, C12PS4B
- Pollutants Controlled: PM, PM<sub>10</sub>

## Applicable Requirements

### EUC12PS (EPCP12PS-1B & EPCP12PS-4B)

PM emission limits: 0.01 gr/scf, 2.84 lb/hr (per stack)

Authority for Requirement: 567 IAC 23.4(13), Iowa DNR Construction Permits 94-A-263-S5 and 97-A-635-S4

PM<sub>10</sub> emission limits: 2.84 lb/hr (per stack)

Authority for Requirements: Iowa DNR Construction Permits 94-A-263-S5 and 97-A-635-S4

### EUC12PS (EPCP12PS-2B & EPCP12PS-3B)

PM emission limits: 0.01 gr/scf, 2.47 lb/hr (per stack)

Authority for Requirement: 567 IAC 23.4(13), Iowa DNR Construction Permits 97-A-633-S4 and 97-A-634-S4

PM<sub>10</sub> emission limits: 2.47 lb/hr (per stack)

Authority for Requirement: Iowa DNR Construction Permits 97-A-633-S4 and 97-A-634-S4

## *Monitoring Approach*

### General Monitoring Guidelines

- CAM involves the observation of control equipment compliance indicators: observation of visible emissions and pressure drops over the water wall scrubber. This plan defines acceptable ranges for these indicators. CAM also includes control equipment maintenance and inspections. Maintenance and inspections that will facilitate control equipment operations are identified in this plan.
- Monitoring is not required during periods of time greater than one day in which the source does not operate.
- If weather prevents visible emissions monitoring, the observer will note the weather conditions on the form used to record monitoring. If an observation is necessary to meet the required daily monitoring, at least three attempts will be made to retake the observation throughout the day. If unsuccessful that day due to weather, an observation will be made the next day the weather permits.

### Excursion from Compliance Indicators

- An excursion occurs when an observed compliance indicator is outside of its defined acceptable indicator range. An excursion does not necessarily indicate a violation of applicable permit terms, conditions, and/or requirements. However, an excursion is a deviation that must be reported in the Semi-Annual Monitoring Report and Annual Compliance Certification Report.
- Corrective actions will begin as soon as possible, but no later than eight hours from the observation of the excursion. (Abnormal conditions discovered through equipment inspection and maintenance requires implementation of remediation within a reasonable timeframe. Paint systems will not operate until the water wall scrubber is operational.)
- If corrective actions do not return the compliance indicator to its defined acceptable indicator range, JDDW will demonstrate compliance with the PM and PM-10 limit by conducting
  - source testing approved by the Department within 90 days of the excursion.
    - If the test demonstrates compliance with emission limits, JDOW will determine new indicator ranges for monitoring based on the testing results.
    - If the test demonstrates noncompliance with emission limits, JDOW will, within 60 days, propose a schedule to implement corrective action to bring the source into compliance and conduct source testing to demonstrate compliance.
  - Report monitoring or other deviations (operating conditions, emission limits, or reporting requirements) in IDNR semi-annual monitoring and annual compliance certification reports.

### **Compliance Indicator Ranges**

- No visible emissions.
- Critical Gauge Readings
  - Acceptable indicator ranges:
    - C12 Spray Booth elimination system stack pressure drop 5.5" to 8.5"

### **Monitoring Methods**

- Daily
  - Complete critical gauge readings of pressure drops. These readings will be documented by the PLC. The readings will be checked once per day utilizing the Realtime Info Portal or by physically accessing the gages. Readings outside of the normal operating ranges will be addressed in a timely manner.
- Weekly
  - Assess paint booth stack for visible emissions.
- Annually
  - Inspect the pressure monitoring equipment and calibrate as needed.

### ***Performance Criteria***

#### **Data Representativeness**

An observation in exceedance of NVE could reveal a decrease in the performance of the water wall scrubber and potentially an increase in particulate emissions. Gauge readings not within the acceptable indicator range may signify reduced water wall scrubber performance leading to an increase in particulate emissions if corrective actions are not initiated.

#### **Record Keeping and Reporting (Verification of Operational Status)**

- JDOW will maintain written or electronic records of the following:
  - Daily critical gauge readings.
  - Weekly visible emissions evaluations.
  - Record any excursions and corrective actions resulting from compliance indicators and inspections and maintenance.
- Records will be kept for at least five years and be available upon request.

#### **Quality Control**

- The water wall scrubber will be operated and maintained as outlined in the above monitoring requirements which are based on manufacturer recommendations and JDOW guidelines.
- JDOW will maintain a basic inventory of spare parts.

#### **Data Collection Procedures**

- Electronic entries are made based on gauge readings. Data collection formats include the "Real Time Info Portal" and the critical gages on the control panels.
- Maintenance personnel record all maintenance/inspections performed on the water wall scrubber and actions resulting from the inspections.

## Emission Point ID Number: EPE2

### Associated Equipment

EU	EU Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EUE2 Wash	E2 Wash System	NA	Reagent	3.75 gal/hr	02-A-016-S4
EUE2 Oven	E2 Wash Oven	NA	Natural Gas	1.9 MMBtu/hr	

### Applicable Requirements

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

*The emissions from this emission point shall not exceed the levels specified below.*

#### Allowable emissions from the stack:

Pollutant: Opacity

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

Authority for Requirement: Iowa DNR Construction Permit 02-A-016-S4  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedance of the indicator opacity of 10% will require the owner/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 DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 3.90 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 02-A-016-S4

Pollutant: Particulate Matter

Emission Limit(s): 3.90 lb/hr, 0.1 gr/dscf

Authority for Requirement: Iowa DNR Construction Permit 02-A-016-S4  
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 1.0 lb/hr, 500 ppmv

Authority for Requirement: Iowa DNR Construction Permit 02-A-016-S4  
567 IAC 23.3(3)"e"

Pollutant: VOC

Emission Limit(s): 245 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Single)

Emission Limit(s): 9.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Total)  
Emission Limit(s): 24.4 tons per rolling 12-month period (facility-wide)  
Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Allowable emissions from EUE2 Wash

Pollutant: Particulate Matter  
Emission Limit(s): 0.1 gr/dscf  
Authority for Requirement: Iowa DNR Construction Permit 02-A-016-S4  
567 IAC 23.3(2)"a"

Allowable emissions from EUE2 Oven

Pollutant: Particulate Matter  
Emission Limit(s): 0.6 lb/MMBtu  
Authority for Requirement: Iowa DNR Construction Permit 02-A-016-S4  
567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)  
Emission Limit(s): 500 ppmv  
Authority for Requirement: Iowa DNR Construction Permit 02-A-016-S4  
567 IAC 23.3(3)"e"

**Operational Limits & Requirements**

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

Process throughput:

1. The oven shall operate on natural gas or liquid petroleum gas (LPG) only.
2. The reagent chemical (caustic) shall contain no VOC and no HAP materials.
3. The reagent chemical (caustic) shall contain less than or equal to ( $\leq$ ) 35% solid contents.
4. The reagent chemical (caustic) shall have a density of less than or equal to ( $\leq$ ) 12.0 pounds per gallon.
5. All of the pumps providing the reagent chemical (caustic) to the washer system shall have a maximum combined capacity of less than or equal to ( $\leq$ ) 13 gallons per hour.

Authority for Requirement: Iowa DNR Construction Permit 02-A-016-S4

Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

1. Maintain on-site the Material Safety Data Sheet (MSDS) for the reagent chemical (caustic) used in the wash system.
2. Maintain on-site the specifications for the reagent chemical (caustic) pumps used in the wash system.

Authority for Requirement: Iowa DNR Construction Permit 02-A-016-S4

3. The Title V permit requires this unit to follow the reporting and record keeping requirements found in the Plant-Wide Conditions section of this permit.

Authority for Requirement: 567 IAC 22.108(3)

**Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

Stack Height (ft, from the ground): 39

Stack Opening (inches, dia): 33

Exhaust Flow Rate (scfm): 11,200

Exhaust Temperature (°F): 70

Discharge Style: Vertical unobstructed

Authority for Requirement: Iowa DNR Construction Permit 02-A-016-S4

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

**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)

**Emission Point ID Numbers: EPE3P-1-O, EPE3P-2-O, EPE3P-3-O,  
EPE3P-4-O, EPE3P-5-O, EPE3P-6-O,**

Associated Equipment

Table 1: E3 Paint Dip Tanks

EP	EU	EU Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EPE3P-1-O	EUE3PD	E3 Paint Dip Tanks (2 tanks)	NA	Paint	21.1 gal/hr	96-A-439-S3
EPE3P-2-O						02-A-273-S2
EPE3P-3-O						02-A-274-S2
EPE3P-4-O						02-A-275-S2
EPE3P-5-O						02-A-276-S2
EPE3P-6-O						02-A-277-S2

**Applicable Requirements**

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

*The emissions from each emission point shall not exceed the levels specified below.*

Pollutant: VOC

Emission Limit(s): 245 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Single)

Emission Limit(s): 9.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Total)

Emission Limit(s): 24.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

**Operational Limits & Requirements**

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

Process throughput:

1. The facility shall maintain its PSD minor source status for at least a three-year period after the issuance date of the applicable construction permit for this source.

Authority for Requirement: Iowa DNR Construction Permits in Table 1: E3 Paint Dip Tanks

**Reporting & Record keeping:**

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

**A. The permittee shall maintain the following monthly records:**

- i. The identification and amount (gallons) of each coating and solvent used in the dip tank.
- ii. The monthly facility wide VOC emission rate
- iii. The rolling 12-month total of the facility wide VOC emissions.
- iv. The VOC, individual and total HAP content of each material used in the dip tank.
- v. The monthly facility wide emission rate of each individual HAP from the facility.
- vi. The monthly emission rate of total HAPS from the facility.
- vii. The rolling 12-month total of each individual HAP from the facility, including fugitive HAP emissions.
- viii. The rolling 12-month total of the total HAPS emitted by the facility, including fugitive HAP emissions.

**B. The rolling 12-month total of the facility wide VOC and HAP emissions shall be recorded as described in the plant-wide conditions.**

Authority for Requirement: Iowa DNR Construction Permits in Table 1: E3 Paint Dip Tanks

**Emission Point Characteristics**

*Each emission point shall conform to the specifications listed below.*

<b>EP</b>	<b>Stack Height (ft, from the ground)</b>	<b>Stack Opening (inches, dia)</b>	<b>Exhaust Flow Rate (scfm)</b>	<b>Exhaust Temperature (°F)</b>	<b>Discharge Style</b>	<b>Construction Permit</b>
EPE3P-1-O	23.8	24	7,400	75	Vertical Unobstructed	96-A-439-S3
EPE3P-2-O	24.2	24	9,150	75	Vertical Unobstructed	02-A-273-S2
EPE3P-3-O	18	30	4,500	75	Vertical Unobstructed	02-A-274-S2
EPE3P-4-O	18	30	4,500	75	Vertical Unobstructed	02-A-275-S2
EPE3P-5-O	18	30	4,500	75	Vertical Unobstructed	02-A-276-S2
EPE3P-6-O	18	30	4,500	75	Vertical Unobstructed	02-A-277-S2

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

**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)

**Emission Point ID Numbers: EPE3PS-1B, EPE3PS-2B, EPE3PS-3B, EPE3PS-4B**

Associated Equipment

Table 1: E3 Paint Spray Booth

EP	EU	EU Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EPE3PS-1B	EUE3PS1	E3 Paint Spray Booth	CEE3PS1: Mat Filter	Paint	12.7gal/hr	02-A-183-S2
EPE3PS-2B			CEE3PS2: Mat Filter			02-A-184-S2
EPE3PS-3B			CEE3PS3: Mat Filter			02-A-549-S2
EPE3PS-4B			CEE3PS4: Mat Filter			02-A-550-S2

**Applicable Requirements**

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

*The emissions from each emission point shall not exceed the levels specified below.*

Pollutant: Opacity

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

Authority for Requirement: Iowa DNR Construction Permits in Table 1: E3 Paint Spray Booth 567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedence of the indicator opacity of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 1.37 lb/hr

Authority for Requirement: Iowa DNR Construction Permits in Table 1: E3 Paint Spray Booth

Pollutant: Particulate Matter

Emission Limit(s): 0.01 gr/scf

Authority for Requirement: Iowa DNR Construction Permits in Table 1: E3 Paint Spray Booth 567 IAC 23.4(13)

Pollutant: VOC

Emission Limit(s): 245 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Single)

Emission Limit(s): 9.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Total)

Emission Limit(s): 24.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

### **Operational Limits & Requirements**

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

Process throughput:

1. Only two spray guns may be used in the E3 spray booth at any one time.
2. The facility shall maintain its PSD minor source status for at least a three-year period after the issuance date of the applicable construction permit for this source.

Control equipment parameters:

1. The owner or operator shall maintain the control equipment according to manufacturer's specifications and maintenance schedule.

Authority for Requirement: Iowa DNR Construction Permits in Table 1: E3 Paint Spray Booth

Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

A. The permittee shall maintain the following monthly records:

- i. The identification and amount (gallons) of each coating and solvent used in the paint spray booth.
- ii. The monthly facility wide VOC emission rate
- iii. The rolling 12-month total of the facility wide VOC emissions.
- iv. The VOC, individual and total HAP content of each material used in the spray booth.
- v. The monthly facility wide emission rate of each individual HAP from the facility.
- vi. The monthly emission rate of total HAPS from the facility.
- vii. The rolling 12-month total of each individual HAP from the facility, including fugitive HAP emissions.
- viii. The rolling 12-month total of the total HAPS emitted by the facility, including fugitive HAP emissions.

B. The rolling 12-month total of the facility wide VOC and HAP emissions shall be recorded as described in the plant-wide conditions.

C. The permittee shall maintain a record of all inspections/maintenance and any action resulting from the inspections/maintenance of the control equipment

Authority for Requirement: Iowa DNR Construction Permits in Table 1: E3 Paint Spray Booth

**Emission Point Characteristics**

*Each emission point shall conform to the specifications listed below.*

Stack Height (ft, from the ground): 40.5

Stack Opening (inches, dia): 42

Exhaust Flow Rate (scfm): 20,000

Exhaust Temperature (°F): 73

Discharge Style: Vertical, unobstructed

Authority for Requirement: Iowa DNR Construction Permits in Table 1: E3 Paint Spray Booth

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

**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 Assurance Monitoring (CAM) Plan E3PS1

## Paint Filter Media Parameters

- Associated Emission Unit: E3PS1
- Associated Emission Point: E3PS1B, E3PS2B, E3PS3B, E3PS4B
- Pollutants Controlled: PM, PM<sub>10</sub>

## Applicable Requirements

PM emission limit: 0.01 gr/dscf (per stack)

Authority for Requirement: 567 IAC 23.4(13) and IDNR Permit No 02-A-183-S2, 02-A-184-S2, 02-A-549-S2, 02-A-550-S2

PM<sub>10</sub> emission limit: 1.37 lb/hr (per stack)

Authority for Requirement: IDNR Permit No 02-A-183-S2, 02-A-184-S2, 02-A-549-S2, 02-A-550-S2

## *Monitoring Approach*

### General Monitoring Guidelines

- CAM involves the observation of control equipment compliance indicators, such as visible emissions, and fan frequency. This plan defines acceptable ranges for these indicators. CAM also includes control equipment maintenance and inspections. Maintenance and inspections that will facilitate consistent control equipment operations are identified in this plan.
- Monitoring is not required during periods of time greater than one day in which the source does not operate.
- If weather prevents visible emissions monitoring, the observer will note the weather conditions on the form used to record monitoring. If an observation is necessary to meet the required daily monitoring, at least three attempts will be made to retake the observation throughout the day. If unsuccessful that day due to weather, an observation will be made the next day the weather permits.

### Excursion from Compliance Indicators

- An excursion occurs when an observed compliance indicator is outside of its defined acceptable indicator range. An excursion does not necessarily indicate a violation of applicable permit terms, conditions, and/or requirements. However, an excursion is a deviation that must be reported in the Semi-Annual Monitoring Report and Annual Compliance Certification Report.
- Corrective actions will begin as soon as possible, but no later than eight hours from the observation of the excursion. (Abnormal conditions discovered through equipment inspection and maintenance also require implementation of remediation within eight hours.)
- If corrective actions do not return the compliance indicator to its defined acceptable indicator range, JDOW will demonstrate compliance with the PM and PM<sub>10</sub> limit by conducting
  - Source testing approved by the Department within 90 days of the excursion.
    - If the test demonstrates compliance with emission limits, JDOW will determine new indicator ranges for monitoring based on the testing results.
    - If the test demonstrates noncompliance with emission limits, JDOW will, within 60 days, propose a schedule to implement corrective action to bring the source into compliance and conduct source testing to demonstrate compliance.
  - Report monitoring or other deviations (operating conditions, emission limits, or reporting requirements) in IDNR semi-annual monitoring and annual compliance certification reports.

### Compliance Indicator Ranges

- No visible emissions
- Exhaust Fan Frequencies
  - Acceptable indicator range: Frequency between 48.0 and 58.8 Hz as indicated by the Fan Frequency on the Panel View or the Real Time Info Portal.

### **Monitoring Methods**

- Daily
  - Complete critical gauge readings of fan frequencies. These readings will be documented by the PLC. The readings will be checked once per day utilizing the Realtime Info Portal or by physically accessing the gages. Readings outside of the normal operating ranges will be addressed in a timely manner.
- Weekly
  - Observe for visible emissions during painting operations of unit.
- Annually
  - Inspect the frequency sending equipment and calibrate as needed.

### ***Performance Criteria***

#### **Data Representativeness**

An observation of visible emissions could indicate a decrease in the performance of the filter media and potentially an increase in particulate emissions.

The variable frequency drives on each exhaust fan automatically increase fan frequency as a result of filter loading. The alarm is set at 58.8Hz to maintain air flow and prevent filter failure.

#### **Record Keeping and Reporting (Verification of Operational Status)**

- JDOW will maintain records of the following:
  - Daily logs of fan frequencies.
  - Weekly visible emissions evaluations
  - Record any excursions and corrective actions resulting from compliance indicators and inspections and maintenance.
- Records will be kept for at least five years and be available upon request.

#### **Quality Control**

- The overspray collection system and its monitoring equipment will be operated and maintained according to manufacturer recommendations and/or as outlined in the above monitoring requirements.
- JDOW will maintain an adequate inventory of spare parts.

#### **Data Collection Procedures**

- Manual log entries are made based on the observation (or not) of visible emissions.
- Fan frequency readings will be recorded daily by the PLC and maintained on the facility's intranet.
- Maintenance personnel record all maintenance/inspections performed on the dust collector and actions resulting from the inspections.

## Emission Point ID Number: EPE4 Oven

### Associated Equipment

EU	EU Description	Control Equipment	Raw Material	Rated Capacity
EUE4 Oven	E4 Paint Line Oven	NA	Natural Gas	3.7 MMBtu/hr

### Applicable Requirements

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

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity

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

Authority for Requirement: Iowa DNR Construction Permit 02-A-042  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedence of the indicator opacity of 25% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter

Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: Iowa DNR Construction Permit 02-A-042  
567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 500 ppmv

Authority for Requirement: Iowa DNR Construction Permit 02-A-042  
567 IAC 23.3(3)"e"

Pollutant: VOC

Emission Limit(s): 245 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Single)

Emission Limit(s): 9.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Total)

Emission Limit(s): 24.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

### **Operational Limits & Requirements**

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

Process throughput:

1. The oven shall be fired by natural gas or liquefied petroleum gas only. The heat input to the burner is 3.7 MMBTU/hr.

Authority for Requirement: Iowa DNR Construction Permit 02-A-042

Reporting & Record keeping:

*All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.*

1. The construction permit does not require any recordkeeping for this emission unit.

Authority for Requirement: Iowa DNR Construction Permit 02-A-042

2. The Title V permit requires this unit to follow the reporting and record keeping requirements found in the Plant-Wide Conditions section of this permit.

Authority for Requirement: 567 IAC 22.108(3)

### **Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.*

Stack Height (ft, from the ground): 24

Stack Opening (inches): 18

Exhaust Flow Rate (scfm): 3,540

Exhaust Temperature (°F): 230

Discharge Style: Vertical, unobstructed

Authority for Requirement: Iowa DNR Construction Permit 02-A-042

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

### **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)

## Emission Point ID Number: EPL4PS-1-B, EPL4PS-2-B and EPL4PS-3-B

### Associated Equipment

Table 1: L4 Paint System Spray Booth

EP	EU	EU Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EPL4PS-1-B	EUL4PS	L4 Paint System Spray Booth	CEL4PSWa: Mat Filter	Paint, Natural Gas	4.75 gal/hr, 3.57 MMBtu/hr	86-A-004-S5
EPL4PS-2-B			CEL4PSWb: Mat Filter			02-A-185-S4
EPL4PS-3-B			CEL4PSWc: Mat Filter			04-A-608-S2

### Applicable Requirements

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

*The emissions from each emission point shall not exceed the levels specified below.*

Pollutant: Opacity

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

Authority for Requirement: Iowa DNR Construction Permits in Table 1: L4 Paint System Spray Booth  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedence of the indicator opacity of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 1.60 lb/hr

Authority for Requirement: Iowa DNR Construction Permits in Table 1: L4 Paint System Spray Booth

Pollutant: Particulate Matter

Emission Limit(s): 0.01 gr/scf

Authority for Requirement: Iowa DNR Construction Permits in Table 1: L4 Paint System Spray Booth  
567 IAC 23.4(13)

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 500 ppmv

Authority for Requirement: Iowa DNR Construction Permits in Table 1: L4 Paint System Spray Booth  
567 IAC 23.3(3)"e"

Pollutant: VOC

Emission Limit(s): 245 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Single)

Emission Limit(s): 9.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Total)

Emission Limit(s): 24.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

### **Operational Limits & Requirements**

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

Process throughput:

1. A maximum of one spray gun shall be operated in Paint Booth L4, EUL4PS, at any one time with a maximum spray capacity per gun of 4.75 gallons per hour.
2. The paint booth L4 air heater shall only be fired by natural gas or liquefied petroleum gas.
3. The facility shall maintain its PSD minor source status for at least a three-year period after the issuance date of the applicable construction permit for this source.

Control equipment parameters:

1. The owner or operator shall maintain the control equipment according to manufacturer's specifications and maintenance schedule.

Authority for Requirement: Iowa DNR Construction Permits in Table 1: L4 Paint System Spray Booth

Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

A. The permittee shall maintain the following monthly records:

- i. The identification and amount (gallons) of each coating and solvent used in the paint spray booth.
- ii. The monthly facility wide VOC emission rate
- iii. The rolling 12-month total of the facility wide VOC emissions.
- iv. The VOC, individual and total HAP content of each material used in the spray booth.
- v. The monthly facility wide emission rate of each individual HAP from the facility.
- vi. The monthly emission rate of total HAPS from the facility.
- vii. The rolling 12-month total of each individual HAP from the facility, including fugitive HAP emissions.
- viii. The rolling 12-month total of the total HAPS emitted by the facility, including fugitive HAP emissions.

B. The rolling 12-month total of the facility wide VOC and HAP emissions shall be recorded as described in the plant-wide conditions.

C. The permittee shall maintain a record of all inspections/maintenance and any action resulting from the inspections/maintenance of the control equipment

Authority for Requirement: Iowa DNR Construction Permits in Table 1: L4 Paint System Spray Booth

**Emission Point Characteristics**

*Each emission point shall conform to the specifications listed below.*

<b>EP</b>	<b>Stack Height (ft, from the ground)</b>	<b>Stack Opening (inches, dia)</b>	<b>Exhaust Flow Rate (scfm)</b>	<b>Exhaust Temperature (°F)</b>	<b>Discharge Style</b>	<b>Construction Permit</b>
EPL4PS-1-B	32.1	40	18,700	70	Vertical Unobstructed	86-A-004-S5
EPL4PS-2-B	32.1	40	18,700	70	Vertical Unobstructed	02-A-185-S4
EPL4PS-3-B	32.1	40	18,700	70	Vertical Unobstructed	04-A-608-S2

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

**Monitoring Requirements**

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

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

**Required for CEL4PSWa, CEL4PSWb and CEL4PSWc**

**Weekly**

- Inspect the paint booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.
- Maintain a written record of the observation and any action resulting from the inspection.

**Record Keeping and Reporting**

Maintenance and inspection records will be kept for five years and available upon request.

**Quality Control**

- The filter equipment will be operated and maintained according to the manufacturers recommendations.

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

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

Authority for Requirement: 567 IAC 22.108(3)

## Emission Point ID Number: EPWPR (Vents Inside)

### Associated Equipment

EU	EU Description	Control Equipment	Raw Material	Rated Capacity
EUWPR	Production welding	NA	Weld Wire	1,500,000 lb/yr

### Applicable Requirements

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

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Fugitive Dust

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

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

Pollutant: VOC

Emission Limit(s): 245 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Single)

Emission Limit(s): 9.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Total)

Emission Limit(s): 24.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

#### Operational Limits & Requirements

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

Process throughput:

1. Weld wire usage shall not exceed 1,500,000 pounds per 12-month rolling period.

Authority for Requirement: 567 IAC 22.108(3)

**Reporting & Record keeping:**

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

1. Record on a monthly basis, the total amount of weld wire. Calculate and record rolling 12-month totals.

Authority for Requirement: 567 IAC 22.108(4)

2. The Title V permit requires this unit to follow the reporting and record keeping requirements found in the Plant-Wide Conditions section of this permit.

Authority for Requirement: 567 IAC 22.108(3)

**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)

## Emission Point ID Numbers: EPMA and EPMPS (Vent Inside)

### Associated Equipment

EP	EU	EU Description	Control Equipment	Raw Material	Rated Capacity
EPMA	EUMA	Misc. Adhesive Usage	NA	Adhesive	5.58 gal/hr
EPMPS	EUMPS	Misc. Paint Usage	NA	Paint	0.28 gal/hr

### Applicable Requirements

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

*The emissions from these emission points shall not exceed the levels specified below.*

Pollutant: VOC

Emission Limit(s): 245 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Single)

Emission Limit(s): 9.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Total)

Emission Limit(s): 24.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

#### Operational Limits & Requirements

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

1. The Title V permit requires this unit to follow the reporting and record keeping requirements found in the Plant-Wide Conditions section of this permit.

Authority for Requirement: 567 IAC 22.108(3)

#### 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)

**Emission Point ID Numbers: EPC8EE, EPL3EE-1, EPL3EE-2, EPL4EE-1,  
EPL4EE-2, EPM6EE**

Associated Equipment

EP	EU	EU Description	Control Equipment	Raw Material	Rated Capacity
EPC8EE	EUEEa	Engine Exhaust in C8	NA	Diesel Fuel	230,000 gal/yr
EPL3EE-1	EUEEb	Engine Exhaust in L3			
EPL3EE-2	EUEEc	Engine Exhaust in L3			
EPL3EE-3	EUEEg	Engine Exhaust in L3			
EPL4EE-1	EUEEd	Engine Exhaust in L4			
EPL4EE-2	EUEEe	Engine Exhaust in L4			
EPM6EE	EUEEf	Engine Exhaust in M6			

**Applicable Requirements**

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

*The emissions from each emission point shall not exceed the levels specified below.*

Pollutant: Opacity

Emission Limit(s): 40 %

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

Pollutant: Particulate Matter

Emission Limit(s): 0.1 gr/scf

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

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 2.5 lb/MMBtu

Authority for Requirement: 567 IAC 23.3(3)"b"(2)

Pollutant: VOC

Emission Limit(s): 245 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Single)

Emission Limit(s): 9.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Total)

Emission Limit(s): 24.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

**Operational Limits & Requirements**

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

Process throughput:

1. No person shall allow, cause or permit the combustion of number 1 or number 2 fuel oil exceeding a sulfur content of 0.5 percent by weight.

Authority for Requirement: 567 IAC 23.3(3)"b"(1)

Reporting & Record keeping:

The following records shall be maintained on-site for five (5) years and available for inspection upon request by representatives of the Department of Natural Resources:

1. The facility shall monitor the percent of sulfur by weight in the fuel oil as delivered. The documentation may be vendor supplied or facility generated.
2. The Title V permit requires this unit to follow the reporting and record keeping requirements found in the Plant-Wide Conditions section of this permit.

Authority for Requirement: 567 IAC 22.108(3)

**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)

**Emission Point ID Number: EPMG (Vent Inside)**

Associated Equipment

EU	EU Description	Control Equipment	Raw Material	Rated Capacity
EUMG	Facility Space Heaters (See Appendix A for list of heaters)	NA	Natural Gas	(See Appendix A for list of individual rated capacities)

**Applicable Requirements**

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

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: VOC

Emission Limit(s): 245 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Single)

Emission Limit(s): 9.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Total)

Emission Limit(s): 24.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

**Operational Limits & Requirements**

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

1. The Title V permit requires this unit to follow the reporting and record keeping requirements found in the Plant-Wide Conditions section of this permit.

Authority for Requirement: 567 IAC 22.108(3)

**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)

## Emission Point ID Number: EP-D14QT

### Associated Equipment

EU	EU Description	Control Equipment	Raw Material	Rated Capacity
EU-D14QT	Quench Tank	NA	Quenching Oil	0.50 gal/hr

### Applicable Requirements

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

*The emissions from this emission point shall not exceed the levels specified below.*

Pollutant: Opacity

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

Authority for Requirement: Iowa DNR Construction Permit 04-A-376-S2

567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedence of the indicator opacity of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 0.23 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 04-A-376-S2

Pollutant: Particulate Matter

Emission Limit(s): 0.01 gr/dscf

Authority for Requirement: Iowa DNR Construction Permit 04-A-376-S2

567 IAC 23.4(13)

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 500 ppmv

Authority for Requirement: Iowa DNR Construction Permit 04-A-376-S2

567 IAC 23.3(3)"e"

Pollutant: VOC

Emission Limit(s): 245 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Single)

Emission Limit(s): 9.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Total)

Emission Limit(s): 24.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

### **Operational Limits & Requirements**

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

#### Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

#### A. The permittee shall maintain the following monthly records:

- i. The identification and amount (gallons) of each coating and solvent used in the paint spray booth.
- ii. The monthly facility wide VOC emission rate
- iii. The rolling 12-month total of the facility wide VOC emissions.
- iv. The VOC, individual and total HAP content of each material used in the spray booth.
- v. The monthly facility wide emission rate of each individual HAP from the facility.
- vi. The monthly emission rate of total HAPS from the facility.
- vii. The rolling 12-month total of each individual HAP from the facility, including fugitive HAP emissions.
- viii. The rolling 12-month total of the total HAPS emitted by the facility, including fugitive HAP emissions.

B. The rolling 12-month total of the facility wide VOC and HAP emissions shall be recorded as described in the plant-wide conditions.

C. The permittee shall maintain a record of all inspections/maintenance and any action resulting from the inspections/maintenance of the control equipment

Authority for Requirement: Iowa DNR Construction Permit 04-A-376-S2

### **Emission Point Characteristics**

*This emission point shall conform to the specifications listed below.*

Stack Height (ft, from the ground): 24

Stack Opening (inches, dia): 10

Exhaust Flow Rate (scfm): 1500

Exhaust Temperature (°F): Ambient

Discharge Style: Vertical Unobstructed

Authority for Requirement: Iowa DNR Construction Permit 04-A-376-S2

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

**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)

## Emission Point ID Numbers: C4PS1, C4PS2, C4PS3, C4PS4

### Associated Equipment

**Table 1: C4 Paint Booth**

EP	EU	EU Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
C4PS1	C4	C4 Paint Booth	CE-C4Dry Filter	Paint	37.5 gal/hr	09-A-498
C4PS2						09-A-499
C4PS3						09-A-500
C4PS4						09-A-501

### Applicable Requirements

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

*The emissions from each emission point shall not exceed the levels specified below.*

Pollutant: Opacity

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

Authority for Requirement: Iowa DNR Construction Permits in Table 1: C4 Paint Booth  
567 IAC 23.3(2)"d"

<sup>(1)</sup> An exceedence of the indicator opacity of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter

Emission Limit(s): 0.01 gr/scf

Authority for Requirement: Iowa DNR Construction Permits in Table 1: C4 Paint Booth  
567 IAC 23.4(13)

Pollutant: VOC

Emission Limit(s): 245 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Single)

Emission Limit(s): 9.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

Pollutant: Hazardous Air Pollutants (Total)

Emission Limit(s): 24.4 tons per rolling 12-month period (facility-wide)

Authority for Requirement: Iowa DNR Construction Permits in Table 1: Plant Wide Conditions

### **Operational Limits & Requirements**

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

Process throughput:

1. A maximum of four (4) spray guns shall be operated in Paint Booth C4, EU-C4 simultaneously at any one time.
2. The facility shall maintain its PSD minor source status for at least a three-year period after the issuance date of this permit.

Control equipment parameters:

1. The owner or operator shall maintain the control equipment according to manufacturer's specifications and maintenance schedule.

Authority for Requirement: Iowa DNR Construction Permits in Table 1: C4 Paint Booth

Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

A. The permittee shall maintain the following monthly records:

- i. The identification and amount (gallons) of each coating, solvent and catalyst content of each material used in the paint spray booth.
- ii. The monthly facility wide VOC emission rate
- iii. The rolling 12-month total of the facility wide VOC emissions.
- iv. The VOC, individual and total HAP content of each material used in the spray booth.
- v. The monthly facility wide emission rate of each individual HAP from the facility.
- vi. The monthly emission rate of total HAPS from the facility.
- vii. The rolling 12-month total of each individual HAP from the facility, including fugitive HAP emissions.
- viii. The rolling 12-month total of the total HAPS emitted by the facility, including fugitive HAP emissions.

B. The rolling 12-month total of the facility wide VOC and HAP emissions shall be recorded as described in the plant-wide conditions.

C. The permittee shall maintain a record of all inspections/maintenance and any action resulting from the inspections/maintenance of the control equipment

Authority for Requirement: Iowa DNR Construction Permits in Table 1: C4 Paint Booth

**Emission Point Characteristics**

*Each emission point shall conform to the specifications listed below.*

<b>EP</b>	<b>Stack Height (ft, from the ground)</b>	<b>Stack Opening (inches, dia)</b>	<b>Exhaust Flow Rate (scfm)</b>	<b>Exhaust Temperature (°F)</b>	<b>Discharge Style</b>	<b>Construction Permit</b>
C4PS1	55	60	45,825	Ambient	Vertical Unobstructed	09-A-498
EPC12PS-2B	55	60	45,825	Ambient	Vertical Unobstructed	09-A-499
EPC12PS-3B	55	60	45,825	Ambient	Vertical Unobstructed	09-A-500
EPC12PS-4B	55	60	45,825	Ambient	Vertical Unobstructed	09-A-501

The temperature and flow rate 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 design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

**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 Assurance Monitoring (CAM) Plan C4PS1, C4PS2, C4PS3, C4PS4 Dry Filters

## Paint Filter Media Parameters

- Associated Emission Units: C4
- Associated Emission Points: C4PS1, C4PS2, C4PS3, C4PS4
- Pollutants Controlled: PM, PM<sub>10</sub>

## Applicable Requirements

PM emission limits: 0.01 gr/scf (per stack)

Authority for Requirement: 567 IAC 23.4(13), Iowa DNR Construction Permits 09-A-498 through 09-A-501

## Monitoring Approach

### General Monitoring Guidelines

- CAM involves the observation of control equipment compliance indicators, such as visible emissions and differential pressure. This plan defines acceptable ranges for these indicators. CAM also includes control equipment maintenance and inspections. Maintenance and inspections that will facilitate consistent control equipment operations are identified in this plan.
- Monitoring is not required during periods of time greater than one day in which the source does not operate.
- If weather prevents visible emissions monitoring, the observer will note the weather conditions on the form used to record monitoring. If an observation is necessary to meet the required daily monitoring, at least three attempts will be made to retake the observation throughout the day. If unsuccessful that day due to weather, an observation will be made the next day the weather permits.

### Excursion from Compliance Indicators

- An excursion occurs when an observed compliance indicator is outside of its defined acceptable indicator range. An excursion does not necessarily indicate a violation of applicable permit terms, conditions, and/or requirements. However, an excursion is a deviation that must be reported in the Semi-Annual Monitoring Report and Annual Compliance Certification Report.
- Corrective actions will begin as soon as possible, but no later than eight hours from the observation of the excursion. (Abnormal conditions discovered through equipment inspection and maintenance also require implementation of remediation within eight hours.)
- If corrective actions do not return the compliance indicator to its defined acceptable indicator range, JDDW will demonstrate compliance with the PM and PM-10 limit by conducting
  - source testing approved by the Department within 90 days of the excursion.
    - If the test demonstrates compliance with emission limits, JDOW will determine new indicator ranges for monitoring based on the testing results.
    - If the test demonstrates noncompliance with emission limits, JDOW will, within 60 days, propose a schedule to implement corrective action to bring the source into compliance and conduct source testing to demonstrate compliance.
  - Report monitoring or other deviations (operating conditions, emission limits, or reporting requirements) in IDNR semi-annual monitoring and annual compliance certification reports.

### Compliance Indicator Ranges

- No visible emissions.
- Exhaust Stack Differential Pressures
  - Acceptable indicator ranges: DP between 0.1 and 0.75 inches of water across the secondary filters as indicated by the differential pressure gages or the Real Time Info Portal.

### **Monitoring Methods**

- Daily
  - Complete critical gauge readings of differential pressures across the secondary filters. These readings will be documented. The readings will be checked once per day utilizing the Realtime Info Portal or by physically accessing the gages. Readings outside of the normal operating ranges will be addressed in a timely manner.
- Weekly
  - Observe for visible emissions during painting operations of unit
- Annually
  - Inspect the differential pressure gages and sending equipment and calibrate as needed.

### ***Performance Criteria***

#### **Data Representativeness**

An observation in of visible emissions could indicate a decrease in the performance of the filter media and potentially an increase in particulate emissions.

#### **Record Keeping and Reporting (Verification of Operational Status)**

- JDOW will maintain records of the following:
  - Daily logs of differential pressures
  - Weekly visible emissions evaluations.
  - Record any excursions and corrective actions resulting from compliance indicators and inspections and maintenance.
- Records will be kept for at least five years and be available upon request.

#### **Quality Control**

- The overspray collection system and its monitoring equipment will be operated and maintained according to manufacturer recommendations and/or as outlined in the above monitoring requirements.
- JDOW will maintain an adequate inventory of spare parts.

#### **Data Collection Procedures**

- Manual log entries are made based on the observation (or not) of visible emissions. These entries are recorded on the weekly filter inspection check sheet.
- Differential pressure readings will be recorded daily by the PLC and maintained on the facility's intranet or recorded manually and maintained in the environmental office.
- Maintenance personnel record all maintenance/inspections performed on the filtration system and actions resulting from the inspections in SAP.

## **IV. General Conditions**

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code chapter 22.

### **G1. Duty to Comply**

1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. *567 IAC 22.108(9)"a"*
2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. *567 IAC 22.105 (2)"h"(3)*
3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. *567 IAC 22.108 (1)"b"*
4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. *567 IAC 22.108 (14)*
5. It shall not be a defense for a permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. *567 IAC 22.108 (9)"b"*

### **G2. Permit Expiration**

1. Except as provided in 567 IAC 22.104, the expiration of this permit terminates the permittee's right to operate unless a timely and complete application has been submitted for renewal. Any testing required for renewal shall be completed before the application is submitted. *567 IAC 22.116(2)*
2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall present or mail the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, 7900 Hickman Rd, Suite #1, Windsor Heights, Iowa 50324, 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 EPA Region VII, Attention: Chief of Air Permits, 901 N. 5th St., Kansas City, KS 66101. The application must include all emission points, emission units, air pollution control equipment, and monitoring devices at the facility. All emissions generating activities, including fugitive emissions, must be included. The definition of a complete application is as indicated in 567 IAC 22.105(2). *567 IAC 22.105*

### **G3. Certification Requirement for Title V Related Documents**

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. *567 IAC 22.107 (4)*

### **G4. Annual Compliance Certification**

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for

determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. *567 IAC 22.108 (15)"e"*

#### **G5. Semi-Annual Monitoring Report**

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with *567 IAC 22.107(4)*. The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. *567 IAC 22.108 (5)*

#### **G6. Annual Fee**

1. The permittee is required under subrule *567 IAC 22.106* to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
3. The following forms shall be submitted annually by March 31 documenting actual emissions for the previous calendar year.
  - a. Form 1.0 "Facility Identification";
  - b. Form 4.0 "Emissions unit-actual operations and emissions" for each emission unit;
  - c. Form 5.0 "Title V annual emissions summary/fee"; and
  - d. Part 3 "Application certification."
4. The fee shall be submitted annually by July 1. The fee shall be submitted with the following forms:
  - a. Form 1.0 "Facility Identification";
  - b. Form 5.0 "Title V annual emissions summary/fee";
  - c. Part 3 "Application certification."
5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.
7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.
8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in *567 IAC 22.115(1)"d"*.

### **G7. Inspection of Premises, Records, Equipment, Methods and Discharges**

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. *567 IAC 22.108 (15)"b"*

### **G8. Duty to Provide Information**

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. *567 IAC 22.108 (9)"e"*

### **G9. General Maintenance and Repair Duties**

The owner or operator of any air emission source or control equipment shall:

1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
2. Remedy any cause of excess emissions in an expeditious manner.
3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. *567 IAC 24.2(1)*

### **G10. Recordkeeping Requirements for Compliance Monitoring**

1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:
  - a. The date, place and time of sampling or measurements
  - b. The date the analyses were performed.
  - c. The company or entity that performed the analyses.
  - d. The analytical techniques or methods used.
  - e. The results of such analyses; and
  - f. The operating conditions as existing at the time of sampling or measurement.
  - g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)
2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.
3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:
  - a. Comply with all terms and conditions of this permit specific to each alternative scenario.

- b. Maintain a log at the permitted facility of the scenario under which it is operating.
- c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. *567 IAC 22.108(4), 567 IAC 22.108(12)*

**G11. Evidence used in establishing that a violation has or is occurring.**

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein.

*1. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:*

- a. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 22;
- b. Compliance test methods specified in 567 Chapter 25; or
- c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.

*2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:*

- a. Any monitoring or testing methods provided in these rules; or
- b. Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule. *567 IAC 21.5(1)-567 IAC 21.5(2)*

**G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. *567 IAC 22.108(6)*

**G13. Hazardous Release**

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 281-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in 567 IAC 131.2(2). *567 IAC Chapter 131-State Only*

**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. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

## 2. Excess Emissions Reporting

a. Oral Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An oral report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1) ) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable emission standard by more than 10 percent or the applicable visible emission standard by more than 10 percent opacity. The oral report may be made in person or by telephone and shall include as a minimum the following:

- i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and expected duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps being taken to remedy the excess emission.
- vi. The steps being taken to limit the excess emission in the interim period.

b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required oral reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:

- i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.
- vi. The steps that were taken to limit the excess emission.
- vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. 567 IAC 24.1(1)-567 IAC 24.1(4)

3. Emergency Defense for Excess Emissions. For the purposes of this permit, an “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed

equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The facility at the time was being properly operated;
- c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and
- d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. *567 IAC 22.108(16)*

#### **G15. Permit Deviation Reporting Requirements**

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). *567 IAC 22.108(5)"b"*

#### **G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations**

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. *567 IAC 23.1(2), 567 IAC 23.1(3), 567 IAC 23.1(4)*

#### **G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification**

1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:
  - a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 22.
  - b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);
  - c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
  - d. The changes are not subject to any requirement under Title IV of the Act.
  - e. The changes comply with all applicable requirements.
  - f. For such a change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:

- i. A brief description of the change within the permitted facility,
  - ii. The date on which the change will occur,
  - iii. Any change in emission as a result of that change,
  - iv. The pollutants emitted subject to the emissions trade
  - v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.
  - vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
  - vii. Any permit term or condition no longer applicable as a result of the change.
- 567 IAC 22.110(1)*

2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. *567 IAC 22.110(2)*

3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 22.110(1). *567 IAC 22.110(3)*

4. The permit shield provided in subrule 22.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. *567 IAC 22.110(4)*

5. 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 is required to do any of the following:

- i. Correct typographical errors
- ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source;
- iii. Require more frequent monitoring or reporting by the permittee; or
- iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.

b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.

c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.

#### 2. Minor Permit Modification.

- a. Minor permit modification procedures may be used only for those permit modifications that do any of the following:
- i. Do not violate any applicable requirements
  - ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit.
  - iii. Do not require or change a case by case determination of an emission limitation or other standard, or increment analysis.
  - iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act.;
  - v. Are not modifications under any provision of Title I of the Act; and
  - vi. Are not required to be processed as significant modification.
- b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:
- i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs.
  - ii. The permittee's suggested draft permit
  - iii. Certification by a responsible official, pursuant to 567 IAC 22.107(4), that the proposed modification meets the criteria for use of a minor permit modification procedures and a request that such procedures be used; and
  - iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 22.107(7).
- c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 22.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, existing permit term terms and conditions it seeks to modify may subject the facility to enforcement action.

3. Significant Permit Modification. Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 22, including those for applications, public participation, review by affected states, and review by the administrator, and those requirements that apply to Title V issuance and renewal. 567 IAC 22.111-567 IAC 22.113 The permittee shall submit an application for a significant permit modification 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 22.105(1)"a"(4)*

#### **G19. Duty to Obtain Construction Permits**

Unless exempted under 567 IAC 22.1(2), the permittee must not construct, install, reconstruct, or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, conditional permit, or permit pursuant to 567 IAC 22.8, or permits required pursuant to 567 IAC 22.4 and 567 IAC 22.5. Such permits shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source. *567 IAC 22.1(1)*

#### **G20. Asbestos**

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when activities involve asbestos mills, surfacing of roadways, manufacturing operations, fabricating, insulating, waste disposal, spraying applications, demolition and renovation operations, training fires and controlled burning of a demolished building. *567 IAC 23.1(3)"a", and 567 IAC 23.2*

#### **G21. Open Burning**

The permittee is prohibited from conducting open burning, except as may be allowed by 567 IAC 23.2. *567 IAC 23.2 except 23.2(3)"h"; 567 IAC 23.2(3)"h" - State Only*

#### **G22. Acid Rain (Title IV) Emissions Allowances**

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. *567 IAC 22.108(7)*

#### **G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements**

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

- a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.
- b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
- c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
- d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.

2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
- d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)

- e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
  - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.
3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
  4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,
  5. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *40 CFR part 82*

#### **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)*

### **G25. Permit Shield**

1. *The director may expressly include in a Title V permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:*

a. Such applicable requirements are included and are specifically identified in the permit;  
or

b. The director, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.

2. A Title V permit that does not expressly state that a permit shield exists shall be presumed not to provide such a shield.

3. A permit shield shall not alter or affect the following:

a. The provisions of Section 303 of the Act (emergency orders), including the authority of the administrator under that section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act;

d. The ability of the department or the administrator to obtain information from the facility pursuant to Section 114 of the Act. *567 IAC 22.108 (18)*

### **G26. Severability**

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. *567 IAC 22.108 (8)*

### **G27. Property Rights**

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

### **G28. Transferability**

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought to determine transferability of the permit. *567 IAC 22.111 (1)"d"*

**G29. Disclaimer**

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions.  
*567 IAC 22.3(3)"c"*

**G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification**

The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with applicable requirements of 567 – Chapter 23 or a permit condition. For the department to consider test results a valid demonstration of compliance with applicable rules or a permit condition, such notice shall be given. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. Unless specifically waived by the department's stack test contact, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. The department may accept a testing protocol in lieu of a pretest meeting. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator  
Iowa DNR, Air Quality Bureau  
7900 Hickman Road, Suite #1  
Windsor Heights, IA 50324  
(515) 242-6001

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program.

*567 IAC 25.1(7)"a", 567 IAC 25.1(9)*

**G31. Prevention of Air Pollution Emergency Episodes**

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons.

567 IAC 26.1(1)

**G32. Contacts List**

The current address and phone number for reports and notifications to the EPA administrator is:

Chief of Air Permits  
EPA Region 7  
Air Permits and Compliance Branch  
901 N. 5<sup>th</sup> Street  
Kansas City, KS 66101  
(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau  
Iowa Department of Natural Resources  
7900 Hickman Road, Suite #1  
Windsor Heights, IA 50324  
(515) 242-5100

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

**Field Office 1**

909 West Main – Suite 4  
Manchester, IA 52057  
(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**

401 SW 7<sup>th</sup> Street, Suite I  
Des Moines, IA 50309  
(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 Dept.**

Air Pollution Control Division  
501 13th St., NW  
Cedar Rapids, IA 52405  
(319) 892-6000

## **Appendix A: Summary of Facility Space Heaters**

## Gas Fired Make-up Air, Process and Space Heating Equipment

<b>John Deere Ottumwa Works</b>
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<b>Summary of Facility Space Heaters (less than 10 Million BTU/hr)</b>
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Emission Unit = building/location + Department

BUILDING / LOCATION	DEPARTMENT	CAPACITY (MBH) (Each Burner/Unit)	CO (lb/yr)	NOx (lb/yr)	SOx (lb/yr)	PM (lb/yr)	PM10 (lb/yr)	VOC (lb/yr)
C3 - North	220	900	649.3	726.6	4.6	58.7	58.7	42.5
C3 - South	220	4950	3571.0	3996.1	25.5	323.1	323.1	233.8
C2 - South	32	1200	865.7	968.8	6.2	78.3	78.3	56.7
C8 Dock	35	1200	865.7	968.8	6.2	78.3	78.3	56.7
N3	6	1200	865.7	968.8	6.2	78.3	78.3	56.7
Powerhouse		2060	1486.1	1663.0	10.6	134.5	134.5	97.3
R	14	1200	865.7	968.8	6.2	78.3	78.3	56.7
R	14	1200	865.7	968.8	6.2	78.3	78.3	56.7
C3 - North	220	4170	3008.3	3366.4	21.5	272.2	272.2	197.0
N5	7	1200	865.7	968.8	6.2	78.3	78.3	56.7
D8	60	1900	1370.7	1533.9	9.8	124.0	124.0	89.7
C9		1900	1370.7	1533.9	9.8	124.0	124.0	89.7
M4	64	3040	2193.1	2454.2	15.7	198.4	198.4	143.6
M6	40	3040	2193.1	2454.2	15.7	198.4	198.4	143.6
C1	19	3040	2193.1	2454.2	15.7	198.4	198.4	143.6
M5	170	1500	1082.1	1210.9	7.7	97.9	97.9	70.9
D4	22	740	533.8	597.4	3.8	48.3	48.3	35.0
C5 - Door Heater	21	740	533.8	597.4	3.8	48.3	48.3	35.0
E2		1500	1082.1	1210.9	7.7	97.9	97.9	70.9
E4	28	1500	1082.1	1210.9	7.7	97.9	97.9	70.9
E4 - Dock		4560	3289.6	3681.3	23.5	297.6	297.6	215.4
E2		4560	3289.6	3681.3	23.5	297.6	297.6	215.4
M8	150	3600	2597.1	2906.3	18.6	235.0	235.0	170.0
N4	6	1500	1082.1	1210.9	7.7	97.9	97.9	70.9
N6 - South	10	1500	1082.1	1210.9	7.7	97.9	97.9	70.9
N6 - North	10	1500	1082.1	1210.9	7.7	97.9	97.9	70.9
N7	7	1500	1082.1	1210.9	7.7	97.9	97.9	70.9
A4	73	1500	1082.1	1210.9	7.7	97.9	97.9	70.9
A3	10	740	533.8	597.4	3.8	48.3	48.3	35.0
C2 - North	30	1500	1082.1	1210.9	7.7	97.9	97.9	70.9
C8	240	3960	2856.8	3196.9	20.4	258.5	258.5	187.1
C8	30	1500	1082.1	1210.9	7.7	97.9	97.9	70.9
C7		2750	1983.9	2220.1	14.2	179.5	179.5	129.9
N1	1	1500	1082.1	1210.9	7.7	97.9	97.9	70.9
C3 - Door Heater		740	533.8	597.4	3.8	48.3	48.3	35.0
M2	13	1500	1082.1	1210.9	7.7	97.9	97.9	70.9
M2	20A	1500	1082.1	1210.9	7.7	97.9	97.9	70.9
L4	90	2500	1803.5	2018.2	12.9	163.2	163.2	118.1
L1/L2	68	740	533.8	597.4	3.8	48.3	48.3	35.0
L4	Paint Booth	3570	2575.4	2882.0	18.4	233.0	233.0	168.6
L3 - East (Noise Room)	90	430	310.2	347.1	2.2	28.1	28.1	20.3
L3 - Center	90	680	490.6	549.0	3.5	44.4	44.4	32.1
L3 - West (Stress Coat)	90	930	670.9	750.8	4.8	60.7	60.7	43.9
C5 - South	27	1500	1082.1	1210.9	7.7	97.9	97.9	70.9
M7 - North	250	1500	1082.1	1210.9	7.7	97.9	97.9	70.9
C1 - South	19	1500	1082.1	1210.9	7.7	97.9	97.9	70.9
C - Large Press	26	1500	1082.1	1210.9	7.7	97.9	97.9	70.9
C - Door Heater	17	740	533.8	597.4	3.8	48.3	48.3	35.0
M6 - NW	250	1500	1082.1	1210.9	7.7	97.9	97.9	70.9
M6 - SE	230	1500	1082.1	1210.9	7.7	97.9	97.9	70.9
C2 - South	32	1500	1082.1	1210.9	7.7	97.9	97.9	70.9
M5 - Center	170	1500	1082.1	1210.9	7.7	97.9	97.9	70.9
C5 - East Strand HV	27	5000	3607.1	4036.5	25.8	326.4	326.4	236.2
C5 - West Strand HV	27	5000	3607.1	4036.5	25.8	326.4	326.4	236.2
M6 - West Strand HV	40	4000	2885.6	3229.2	20.6	261.1	261.1	188.9
M	20B	740	533.8	597.4	3.8	48.3	48.3	35.0
M1	20C	740	533.8	597.4	3.8	48.3	48.3	35.0
E4 - North	21	740	533.8	597.4	3.8	48.3	48.3	35.0
C4	27	1500	1082.1	1210.9	7.7	97.9	97.9	70.9
C6	17	1500	1082.1	1210.9	7.7	97.9	97.9	70.9
C12		740	533.8	597.4	3.8	48.3	48.3	35.0
C10 - Paint Booth South	27	7900	5699.2	6377.6	40.7	515.6	515.6	373.2
C10 - Paint Booth North	27	7900	5699.2	6377.6	40.7	515.6	515.6	373.2
C10 - Dry Off Oven	27	2000	1442.8	1614.6	10.3	130.5	130.5	94.5
C10 - Paint Oven Zone #1	27	5200	3751.3	4197.9	26.8	339.4	339.4	245.6
C10 - Paint Oven Zone #2	27	2300	1659.2	1856.8	11.9	150.1	150.1	108.6
B	9	740	533.8	597.4	3.8	48.3	48.3	35.0
B2	9	740	533.8	597.4	3.8	48.3	48.3	35.0
R - Parts Washer	14	900	649.3	726.6	4.6	58.7	58.7	42.5
W3		370	266.9	298.7	1.9	24.2	24.2	17.5
C3 - Rim Area	38	1500	1082.1	1210.9	7.7	97.9	97.9	70.9
C3 - Rim Wash	38	1350	973.9	1089.8	7.0	88.1	88.1	63.8
M8 - Door Heater West	150	740	533.8	597.4	3.8	48.3	48.3	35.0
M8 - Door Heater East	150	740	533.8	597.4	3.8	48.3	48.3	35.0
E2 - Washer Stage 1	22	3500	2524.9	2825.5	18.0	228.4	228.4	165.3
E2 - Washer Stage 2	22	3500	2524.9	2825.5	18.0	228.4	228.4	165.3
C10 - Washer Stage 1	27	5300	3823.5	4278.7	27.3	345.9	345.9	250.3
C10 - Washer Stage 3	27	3500	2524.9	2825.5	18.0	228.4	228.4	165.3
E4 Cure Oven	28	4000	2885.6	3229.2	20.6	261.1	261.1	188.9
E2 - Dry Off	22	2000	1442.8	1614.6	10.3	130.5	130.5	94.5
M2 - Door	20	2712	1956.5	2189.4	14.0	177.0	177.0	128.1
C6 - East	26	3255	2348.2	2627.7	16.8	212.5	212.5	153.8
C - West	26	3255	2348.2	2627.7	16.8	212.5	212.5	153.8
M1 - Door	20	740	533.8	597.4	3.8	48.3	48.3	35.0
C9 Paint booth	29	3000	2164.2	2421.9	15.5	195.8	195.8	141.7
<b>Total</b>			<b>131,861</b>	<b>147,559</b>	<b>942</b>	<b>11,930</b>	<b>11,930</b>	<b>8,634</b>