

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

**Name of Permitted Facility:**     **CDI, LLC**  
**Facility Location:**           **305 Nerem Drive South**  
  **Forest City, Iowa 50436**

**Air Quality Operating Permit Number: 06-TV-004R1**  
**Expiration Date: November 19, 2017**  
**Permit Renewal Application Deadline: May 19, 2017**

**EIQ Number: 92-6912**  
**Facility File Number: 95-01-012**

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**Responsible Official**

**Name:**                    **David L. Nagle**  
**Title:**                    **General Manager**  
**Mailing Address:**    **305 Nerem Drive South, Forest City, Iowa 50436**  
**Phone #:**               **(641) 585-5900**

**Permit Contact Person for the Facility**

**Name:**                    **David L. Nagle**  
**Title:**                    **General Manager**  
**Mailing Address:**    **305 Nerem Drive South, Forest City, Iowa 50436**  
**Phone #:**               **(641) 585-5900**

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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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Catharine Fitzsimmons, Chief of Air Quality Bureau

Date

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### Abbreviations

acfm.....	Actual cubic feet per minute
BACT .....	Best Available Control Technology
CE .....	control equipment
CEM.....	continuous emission monitor
CFR.....	Code of Federal Regulations
DAC .....	De-Butanized Aromatic Concentrate
EIQ.....	Emissions inventory questionnaire
EP .....	emission point
EU .....	emission unit
°F.....	Degrees Fahrenheit
gr./dscf .....	Grains per dry standard cubic foot
IAC.....	Iowa Administrative Code
IDNR.....	Iowa Department of Natural Resources
kg.....	kilogram
lb/hr.....	Pounds per hour
lb/MMBtu .....	Pounds per million British thermal units
NAICS.....	North American Industry Classification System
MVAC.....	Motor vehicle air conditioner
N/A.....	Not Applicable
NSPS .....	New source performance standards
ppmv .....	Parts per million by volume
SIC .....	Standard Industrial Classification
SCC.....	Source Classification Codes
ton/hr.....	Tons per hour
USEPA.....	United States Environmental Protection Agency

### Pollutants

PM.....	Particulate matter
PM <sub>10</sub> .....	Particulate matter ten microns and less in diameter
SO <sub>2</sub> .....	Sulfur dioxide
SO <sub>x</sub> .....	Sulfur oxides
NO <sub>x</sub> .....	Nitrogen oxides
VOC .....	Volatile organic compounds
CO.....	Carbon monoxide
HAP.....	Hazardous air pollutants

# I. Facility Description and Equipment List

Facility Name: CDI, LLC

Permit Number: 06-TV-004R1

Facility Description: Motor Home Painting

## Equipment List

<b>Emission Point Number</b>	<b>Associated Emission Unit(s) Number (s)</b>	<b>Associated Emission Unit Description</b>	<b>IDNR Construction Permit Number</b>
BC1	BC1	Basecoat Paint Booth #1	02-A-479-S3
BC2			02-A-480-S3
BC3	BC2	Basecoat Paint Booth #2 and Oven	05-A-694-S2
BC4			05-A-695-S2
BC5	BC3	Basecoat Paint Booth #3 and Oven	05-A-696-S2
BC6			05-A-697-S2
CC1	CC1	Clearcoat Paint Booth #1 and Oven	02-A-481-S3
CC2			02-A-482-S3
CC3	CC2	Clearcoat Paint Booth #2 and Oven	02-A-483-S3
CC4			02-A-484-S3
CC5	CC3	Clearcoat Paint Booth #3 and Oven	02-A-485-S3
CC6			02-A-486-S3
FF4	FFB	Final Finish Paint Booth and Oven <sup>(*)</sup>	07-A-1262-S2
FF5			07-A-1263-S2
MR1	MR	Paint Mix Room	02-A-720-S3
E1	SA	Sanding Area	05-A-698-S2
E2			05-A-699-S2
E3			05-A-700-S2
E4			05-A-701-S2
SR1	SR	Spray Room	05-A-702-S2
SR2			05-A-703-S2
SR3			05-A-704-S2
SR4			05-A-705-S3
FF1	FF	Final Finish	05-A-706-S2
FF2			05-A-707-S2
FF3			05-A-708-S2

Note: Equipment enclosed in double borders is grouped in a table in the Emission Point-Specific Conditions section of the permit.

<sup>(\*)</sup> Construction permits identify this emission unit as Clearcoat Point Booth #4 and Natural Gas Fired Oven.

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**Insignificant Activities Equipment List**

<b>Insignificant Emission Unit Number</b>	<b>Insignificant Emission Unit Description</b>
HT1	Natural Gas Radiant Heaters (11 units, 0.15 MMBtu/hr each)
HT2	Natural Gas Radiant Heaters (5 units, 0.125 MMBtu/hr each)

## II. Plant-Wide Conditions

Facility Name: CDI, LLC  
Permit Number: 06-TV-004R1

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

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### Permit Duration

The term of this permit is: Five (5) years.  
Commencing on: November 20, 2012  
Ending on: November 19, 2017

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

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### Plant-wide Emission Limits

*The following limitations and supporting regulations are applicable plantwide:*

Pollutant: VOC

VOC Emission Limit: Plant-wide VOC emissions shall not exceed 249 tons per rolling 365 day period.

Authority for Requirement: Iowa DNR Construction Permits:  
02-A-479-S3 through 02-A-486-S3  
02-A-720-S3  
05-A-694-S2 through 05-A-697-S2  
05-A-702-S2 through 05-A-708-S2, 05-A-705-S3  
07-A-1262-S2 and 07-A-1263-S2

Pollutant: Organic HAPs

Emission Limit: 1.34 kg (1.34 lb) organic HAPs per kg (lb) coating solids as a rolling 12-month emission rate and determined on a monthly basis.

Authority for Requirement: Iowa DNR Construction Permits:  
02-A-479-S3 through 02-A-486-S3  
02-A-720-S3  
05-A-694-S2 through 05-A-697-S2  
05-A-702-S2 through 05-A-708-S2, 05-A-705-S3  
07-A-1262-S2 and 07-A-1263-S2  
567 IAC 23.1(4)"cp", 40 CFR 63 Subpart PPPP, and  
Iowa DNR Administrative Consent Order No. 2004-AQ-68,

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## **Emission Limits**

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

Opacity (visible emissions): 40% opacity

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

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

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

### Particulate Matter:

No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed 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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#### **40 CFR 63 Subpart PPPP Requirements**

This facility's coating operation is subject to the National Emission Standard for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products – 40 CFR 63 subpart PPPP. The subpart was promulgated on April 19, 2004 and amended on April 26, 2004 and April 24, 2007.

The web link to Subpart PPPP is included as Appendix A in this permit.

#### Affected Source

Pursuant to 40 CFR 63.4482(b), affected units are the equipment in surface preparation (including dried coating removal), coating application and curing, equipment cleaning, paint and solvent storage, mixing and conveying vessels, and storage and conveying waste material generated from the coating operations.

Regardless of 40 CFR 63.4482(c), (d) and (e) which defines new sources as those painting operations that were built after December 4, 2002, CDI's painting operations are considered new sources as required by Iowa DNR Administrative Consent Order No. 2004-AQ-68 and all the construction permits issued to the facility.

#### Compliance Dates:

Pursuant to 40 CFR 63.4483(a), new or reconstructed affected units have a following compliance date:

- (1) If the initial startup of your new or reconstructed affected source is before April 19, 2004, the compliance date is April 19, 2004.
- (2) If the initial startup of your new or reconstructed affected source occurs after April 19, 2004, the compliance date is the date of initial startup of your affected source.

#### Initial Notification (40 CFR 63.4510(b))

You must submit the initial notification required by §63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after April 19, 2004, whichever is later. The Initial Notification was sent to EPA Region VII on April 9, 2007.

#### Emission Limit

The surface coating activities are new affected sources and belong to the subcategory of "Assembled On-road Vehicle". Therefore, pursuant to 40 CFR 63.4490(a)(4), CDI shall limit organic HAP emissions to no more than 1.34 kg (1.34 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period. Pursuant to 40 CFR 63.4500(a)(1), the facility must be in compliance with this emission limit at all times.

#### Options for Meeting Emission Limits

Pursuant to 40 CFR 63.4491, to determine whether the organic HAP emission rate is equal to or less than the applicable emission limit in 40 CFR 63.4490, the facility must use at least one of the following three compliance options.

1. Compliant material option
2. Emission rate without add-on controls option
3. Emission rate with add-on controls option

As required by IDNR Consent Administrative Consent Order No. 2004-AQ-68, CDI will implement the 2nd compliance option - "Emission rate without add-on controls."

#### Operating Limits and Work Practice Standards

According to § 63.4493, for any coating operation(s) on which you use the emission rate without add-on controls option, you are not required to meet any operating limits or work practice standards.

#### Compliance Requirements

The initial compliance period begins on the applicable compliance date and ends on the last day of the 12th month following the compliance date. Continuous compliance is based on a 12-month rolling period (rolled monthly) which begins after the initial compliance period. The demonstration of compliance depends on the option you choose.

Pursuant to 40 CFR 63.4550, for the emission rate without add-on controls option, you must complete the initial compliance demonstration according to §63.4551 and the continuous compliance demonstration according to §63.4552.

#### Notification of Compliance Status

According to 40 CFR 63.4510(c), you must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in § 63.4550. The notification of compliance status must contain the information specified in 40 CFR 63.4510(c)(1) through (11) and in 40 CFR 63.9(h).

#### Reports and Record Keeping

Refer to 40 CFR 63.4520, 4530, and 4531 for reports and record keeping requirements.

Authority for Requirement: 567 IAC 23.1(4)"cp", 40 CFR 63 Subpart PPPP

## **Requirements of Administrative Consent Order No. 2004-AQ-68**

On December 27, 2004, Iowa DNR issued Administrative Consent Order No. 2004-AQ-68 to CDI, LLC which is included as Appendix B to this permit. The Order orders and CDI agrees to the following:

1. CDI shall immediately comply with the requirements of Clean Air Act Section 112(g) at its Forest City facility by implementing one of the control strategies specified in the National Emission Standard for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR 63, subpart PPPP;
2. In the future, CDI shall comply with the conditions of its construction permits; and
3. Within 30 days of the date of the Director signs this order, CDI shall pay a penalty of \$8,000.00.

For further requirements related to compliance with the 40 CFR 63 subpart PPPP and controlling HAP emissions, please see Exhibit "A" to the Order.

Authority for Requirement: Iowa DNR Administrative Consent Order No. 2004-AQ-68

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### III. Emission Point-Specific Conditions

Facility Name: CDI, LLC  
 Permit Number: 06-TV-004R1

#### Emission Point ID Number: BC1 through BC6

#### Associated Equipment

**Table Basecoat-1**

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID & Description
BC1	BC1	Basecoat Paint Booth #1 and Oven	Paint Natural Gas	16.8 Gal/hr 3 MMBtu/hr	BC1: Dry Filters
BC2					BC2: Dry Filters
BC3	BC2	Basecoat Paint Booth #2 and Oven	Paint Natural Gas	16.8 Gal/hr 3 MMBtu/hr	BC3: Dry Filters
BC4					BC4: Dry Filters
BC5	BC3	Basecoat Paint Booth #3 and Oven	Paint Natural Gas	16.8 Gal/hr 3 MMBtu/hr	BC5: Dry Filters
BC6					BC6: Dry Filters

#### 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.*

**Table Basecoat-2**

EP	EU	Opacity	PM (gr/scf)	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	SO <sub>2</sub> (ppmv)	VOC (tpy)	Total HAP (kg/kg)	Iowa DNR Construction Permit #
BC1	BC1	40% <sup>(1)</sup>	0.01	0.70	0.35	500	249 <sup>(2)</sup>	1.34 <sup>(3)</sup>	02-A-479-S3
BC2		40% <sup>(1)</sup>	0.01	0.70	0.35	500			02-A-480-S3
BC3	BC2	40% <sup>(1)</sup>	0.01	0.70	0.35	500			05-A-694-S2
BC4		40% <sup>(1)</sup>	0.01	0.70	0.35	500			05-A-695-S2
BC5	BC3	40% <sup>(1)</sup>	0.01	0.70	0.35	500			05-A-696-S2
BC6		40% <sup>(1)</sup>	0.01	0.70	0.35	500			05-A-697-S2

<sup>(1)</sup> An exceedance 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 exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>(2)</sup> Plant-wide VOC emissions shall not exceed 249 tons per rolling 365-day period.

<sup>(3)</sup> Per 40 CFR §63.4490(b)(4), each new assembled on-road vehicle coating affected source is limited to organic hazardous air pollutant (HAP) emissions of no more than 1.34 kg (1.34 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

**Table Basecoat-3 – Authority for Emission Limits in Table Basecoat-2**

<b>Pollutant</b>	<b>Emission Limits</b>	<b>Authority for Requirement</b>
Opacity	40%	567 IAC 23.3(2)"d" and Iowa DNR Construction Permits Referenced in Table Basecoat-2
PM	0.01 gr/dscf	567 IAC 23.4(13) and Iowa DNR Construction Permits Referenced in Table Basecoat-2
PM/PM <sub>10</sub>	0.70 lb/hr 0.35 lb/hr	Iowa DNR Construction Permits Referenced in Table Basecoat-2
SO <sub>2</sub>	500 ppmv	567 IAC 23.3(3)"e"
VOC	249 tpy	Iowa DNR Construction Permits Referenced in Table Basecoat-2
Total HAP	1.34 kg/kg	567 IAC 23.1(4)"cp", 40 CFR 63 Subpart PPPP, and Iowa DNR Construction Permits Referenced in Table Basecoat-2

**Operational Limits & Requirements**

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

**NESHAP Applicability:**

These emission units are subject to Subparts A (General Provisions; 40 CFR §63.1 – 40 CFR §63.15) and PPPP (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products; 40 CFR §63.4480 – 40 CFR §63.4581) of the National Emission Standards for Hazardous Air Pollutants (NESHAP).

The owner or operator shall demonstrate compliance through one of the methods listed in 40 CFR §63.4491 for purposes of NESHAP Subpart PPPP on a 12-month rolling basis.

Authority for Requirement: Iowa DNR construction permits 02-A-479-S3, 02-A-480-S3, and 05-A-694-S2 through 05-A-697-S2.

**Operating Limits:**

- A. Plant-wide VOC emissions shall not exceed 249 tons per rolling 365-day period.
- B. Only HVLP guns shall be used in these emission units.
- C. The owner or operator shall inspect and maintain the control equipment according to manufacturer's recommendations.
- D. These emission units are subject to all applicable operating limits set forth in NESHAP Subparts A (40 CFR §63.1 – 40 CFR §63.15) and PPPP (40 CFR §63.4480 – 40 CFR §63.4581).
- E. All emission units at the plant covered by an air construction permit are limited to 12 hours of operation per day.

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.*

- A. A copy of the Material Safety Data Sheet (MSDS) for each material used in each booth.
- B. A log of the VOC content of each coating (as applied) used in each booth.
- C. A log of the daily amount of each VOC containing material used at the facility (plant number 95-01-012). This log shall show:
  - The amount of each material used (in gallons),
  - The solids content (in weight percent),
  - The VOC content, and
  - Each hazardous air pollutant (HAP).Calculate and record the 365-day rolling total for VOC for each day of operation.
- D. The amount of cleaning solvent shipped off-site for recovery is allowed to be subtracted from the VOC usage tools. Records from the recovery company shall be kept which document the credit claimed and the dates shipped.
- E. A log of all inspections and maintenance of the control equipment.
- F. All applicable recordkeeping and monitoring set forth in NESHAP Subparts A (40 CFR §63.1 – 40 CFR §63.15) and PPPP (40 CFR §63.4480 – 40 CFR §63.4581).
- G. The number of hours operated each day for all emission units at the plant covered by an air construction permit.

Authority for Requirement: Iowa DNR construction permits 02-A-479-S3, 02-A-480-S3, and 05-A-694-S2 through 05-A-697-S2.

**Emission Point Characteristics**

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

Table Basecoat-4			Stack Characteristics				
EP	EU	Construction Permit #	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Exhaust Temp. (°F)	Exhaust Flowrate (scfm)
BC1	BC1	02-A-479-S3	30	Vertical unobstructed	34	71	13,178
BC2		02-A-480-S3	30	Vertical unobstructed	34	85	11,396
BC3	BC2	05-A-694-S2	30	Vertical unobstructed	34	76	13,526
BC4		05-A-695-S2	30	Vertical unobstructed	34	77	13,608
BC5	BC3	05-A-696-S2	30	Vertical unobstructed	34	77	13,608
BC6		05-A-697-S2	30	Vertical unobstructed	34	77	13,608

Authority for Requirement: Iowa DNR Construction Permits Referenced In Table Basecoat-4

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point 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

Relevant requirements of O & M plan for this equipment: PM/PM<sub>10</sub>

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

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

**Agency Operation & Maintenance Plan for each Paint Booth in Table Basecoat 1**

**Weekly**

- Inspect each 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.

Authority for Requirement: 567 IAC 22.108(3)

## Emission Point ID Number: CC1 through CC6, FF4 and FF5

### Associated Equipment

**Table Clearcoat-1**

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID & Description
CC1	CC1	Clearcoat Paint Booth #1 and Oven	Paint Natural Gas	16.8 Gal/hr 3 MMBtu/hr	CC1: Dry Filters
CC2					CC2: Dry Filters
CC3	CC2	Clearcoat Paint Booth #2 and Oven	Paint Natural Gas	16.8 Gal/hr 3 MMBtu/hr	CC3: Dry Filters
CC4					CC4: Dry Filters
CC5	CC3	Clearcoat Paint Booth #3 and Oven	Paint Natural Gas	16.8 Gal/hr 3 MMBtu/hr	CC5: Dry Filters
CC6					CC6: Dry Filters
FF4	FFB	Final Finish Paint Booth and Oven	Clearcoat, Paint Natural Gas	16.8 Gal/hr 3 MMBtu/hr	FFB: Dry Filters
FF5					FFB: Dry Filters

### 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.*

**Table Clearcoat-2**

EP	EU	Opacity	PM (gr/scf)	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	SO <sub>2</sub> (ppmv)	VOC (tpy)	Total HAP (kg/kg)	Iowa DNR Construction Permit #
CC1	CC1	40% <sup>(1)</sup>	0.01	0.60	0.30	500	249 <sup>(2)</sup>	1.34 <sup>(3)</sup>	02-A-481-S3
CC2		40% <sup>(1)</sup>	0.01	0.60	0.30	500			02-A-482-S3
CC3	CC2	40% <sup>(1)</sup>	0.01	0.60	0.30	500			02-A-483-S3
CC4		40% <sup>(1)</sup>	0.01	0.60	0.30	500			02-A-484-S3
CC5	CC3	40% <sup>(1)</sup>	0.01	0.60	0.30	500			02-A-485-S3
CC6		40% <sup>(1)</sup>	0.01	0.60	0.30	500			02-A-486-S3
FF4	FFB	40% <sup>(1)</sup>	0.01	0.78	0.78	500			07-A-1262-S2
FF5		40% <sup>(1)</sup>	0.01	0.56	0.56	500			07-A-1263-S2

<sup>(1)</sup> An exceedance 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 exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>(2)</sup> Plant-wide VOC emissions shall not exceed 249 tons per rolling 365-day period.

<sup>(3)</sup> Per 40 CFR §63.4490(b)(4), each new assembled on-road vehicle coating affected source is limited to organic hazardous air pollutant (HAP) emissions of no more than 1.34 kg (1.34 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

**Table Clearcoat-3 – Authority for Emission Limits in Table Clearcoat-2**

<b>Pollutant</b>	<b>Emission Limits</b>	<b>Authority for Requirement</b>
Opacity	40%	567 IAC 23.3(2)"d" and Iowa DNR Construction Permits Referenced in Table Clearcoat-2
PM	0.01 gr/dscf	567 IAC 23.4(13) and Iowa DNR Construction Permits Referenced in Table Clearcoat-2
PM	0.60 lb/hr	Iowa DNR Construction Permits Referenced in Table Clearcoat-2 for EP CC1 through CC6
	0.78 lb/hr	Iowa DNR Construction Permit 07-A-1262-S2
	0.56 lb/hr	Iowa DNR Construction Permit 07-A-1263-S2
PM-10	0.30 lb/hr	Iowa DNR Construction Permits Referenced in Table Clearcoat-2 for EP CC1 through CC6
	0.78 lb/hr	Iowa DNR Construction Permit 07-A-1262-S2
	0.56 lb/hr	Iowa DNR Construction Permit 07-A-1263-S2
SO <sub>2</sub>	500 ppmv	567 IAC 23.3(3)"e"
VOC	249 tpy	Iowa DNR Construction Permits Referenced in Table Clearcoat-2
Total HAP	1.34 kg/kg	567 IAC 23.1(4)"cp", 40 CFR 63 Subpart PPPP, and Iowa DNR Construction Permits Referenced in Table Clearcoat-2

**Operational Limits & Requirements**

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

NESHAP Applicability:

These emission units are subject to Subparts A (General Provisions; 40 CFR §63.1 – 40 CFR §63.15) and PPPP (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products; 40 CFR §63.4480 – 40 CFR §63.4581) of the National Emission Standards for Hazardous Air Pollutants (NESHAP).

Authority for Requirement: Iowa DNR Construction Permits Referenced in Table Clearcoat-2  
567 IAC 23.1(4)"cp"

Operating Limits:

- A. Plant-wide VOC emissions shall not exceed 249 tons per rolling 365-day period.
- B. Only HVLP guns shall be used in these emission units.
- C. The owner or operator shall inspect and maintain the control equipment according to manufacturer's recommendations.
- D. These emission units are subject to all applicable operating limits set forth in NESHAP

Subparts A (40 CFR §63.1 – 40 CFR §63.15) and PPPP (40 CFR §63.4480 – 40 CFR §63.4581).

- E. All emission units at the plant covered by an air construction permit are limited to 12 hours of operation per day.

Authority for Requirement: Iowa DNR Construction Permits Referenced in Table Clearcoat-2

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.*

- A. A copy of the Material Safety Data Sheet for each material used in each emission booth.
- B. A log of the VOC content of each coating (as applied) used in each booth.
- C. A log of the daily amount of each VOC containing material used at the facility (Plant number 95-01-012). This log shall show:
- The amount of each material used (in gallons),
  - The solids content (in weight percent),
  - The VOC content, and
  - Each Hazardous air pollutant (HAP).
  - Calculate and record the 365-day rolling total for VOC for each day of operation.
- D. The amount of cleaning solvent shipped off-site for recovery is allowed to be subtracted from the VOC usage tools. Records from the recovery company shall be kept which document the credit claimed and the dates shipped.
- E. A log of all inspections and maintenance of the control equipment.
- F. All applicable recordkeeping and monitoring set forth in NESHAP Subparts A (40 CFR §63.1 – 40 CFR §63.15) and PPPP (40 CFR §63.4480 – 40 CFR §63.4581).
- G. The number of hours operated each day for all emission units at the plant covered by an air construction permit.

Authority for Requirement: Iowa DNR Construction Permits Referenced in Table Clearcoat-2

### **Emission Point Characteristics**

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

<b>Table Clearcoat-4</b>			<b>Stack Characteristics</b>				
<b>EP</b>	<b>EU</b>	<b>Construction Permit #</b>	<b>Stack Height (feet, above ground)</b>	<b>Discharge Style</b>	<b>Stack Opening (inches, dia.)</b>	<b>Exhaust Temp. (°F)</b>	<b>Exhaust Flowrate (scfm)</b>
CC1	CC1	02-A-481-S3	30	Vertical unobstructed	34	88	13,551
CC2		02-A-482-S3	30	Vertical unobstructed	34	86	9,362
CC3	CC2	02-A-483-S3	30	Vertical unobstructed	34	73	15,799
CC4		02-A-484-S3	30	Vertical unobstructed	34	70	15,000
CC5	CC3	02-A-485-S3	30	Vertical unobstructed	34	79	10,379
CC6		02-A-486-S3	30	Vertical unobstructed	34	70	15,000
FF4	FFB	07-A-1262-S2	30	Vertical unobstructed	34	80	9,049
FF5		07-A-1263-S2	30	Vertical unobstructed	34	81	6,519

Authority for Requirement: Iowa DNR Construction Permits Referenced In Table Clearcoat-4

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

### **Stack Testing:**

One of the following emission points shall be tested for the pollutants described below: EP CC3, EP CC4 or EP CC6

Pollutant – PM (State)

Stack test to be completed by November 20, 2014

Test Method –40 CFR 60, Appendix A, Method 5 and 40 CFR 51 Appendix M Method 202

Authority for Requirement – 567 IAC 22.108(3)

Pollutant – PM-10

Stack test to be completed by November 20, 2014

Test Method – 40 CFR 51, Appendix M, 201A with 202 or approved alternative

Authority for Requirement – 567 IAC 22.108(3)

*The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)*

**Monitoring Requirements**

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

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

Relevant requirements of O & M plan for this equipment: PM/PM10

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

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

**Agency Operation & Maintenance Plan for Each Paint Booth in Table Clearcoat 1**

**Weekly**

- Inspect each 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.

Authority for Requirement: 567 IAC 22.108(3)

## **Emission Point ID Number: MR1**

### Associated Equipment

Associated Emission Unit ID Numbers: MR

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Emission Units vented through this Emission Point: MR

Emission Unit Description: Paint Mix Room

Raw Material/Fuel: Paint

Rated Capacity: 100 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: VOC

Emission Limit(s): 249 tpy<sup>(1)</sup>

<sup>(1)</sup> Plant-wide VOC emissions shall not exceed 249 tons per rolling 365-day period.

Authority for Requirement: Iowa DNR Construction Permit 02-A-720-S3

Pollutant: Total HAP

Emission Limit(s): 1.34 kg/kg<sup>(2)</sup>

<sup>(2)</sup> Per 40 CFR §63.4490(b)(4), each new assembled on-road vehicle coating affected source is limited to organic hazardous air pollutant (HAP) emissions of no more than 1.34 kg (1.34 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

Authority for Requirement: Iowa DNR Construction Permit 02-A-720-S3  
40 CFR 63, Subpart PPPP  
567 IAC 23.1(4)"cp"

#### **Operational Limits & Requirements**

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

#### **NESHAP Applicability:**

This emission unit is subject to Subparts A (General Provisions; 40 CFR §63.1 – 40 CFR §63.15) and PPPP (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products; 40 CFR §63.4480 – 40 CFR §63.4581) of the National Emission Standards for Hazardous Air Pollutants (NESHAP).

The owner or operator shall demonstrate compliance with the Total HAP limit of 1.34 kg/kg through one of the methods listed in 40 CFR §63.4491 for purposes of NESHAP Subpart PPPP on a 12-month rolling basis.

Operating Limits:

- A. Plant-wide VOC emissions shall not exceed 249 tons per rolling 365-day period.
- B. Covers shall be maintained on all coating containers when practical.
- C. This emission unit is subject to all applicable operating limits set forth in NESHAP Subparts A (40 CFR §63.1 – 40 CFR §63.15) and PPPP (40 CFR §63.4480 – 40 CFR §63.4581).
- D. All emission units at the plant covered by an air construction permit are limited to 12 hours of operation per day.

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.*

- A. A copy of the Material Safety Data Sheet (MSDS) for each material used in this emission unit.
- B. A log of the daily amount of each VOC containing material used at the facility (plant number 95-01-012). This log shall show:
  - The amount of each material used (in gallons),
  - The solids content (in weight percent),
  - The VOC content, and
  - Each hazardous air pollutant (HAP).
  - Calculate and record the 365-day rolling total for VOC for each day of operation.
- C. The amount of cleaning solvent shipped off-site for recovery is allowed to be subtracted from the VOC usage totals. Records from the recovery company shall be kept which document the credit claimed and the dates shipped.
- D. All applicable recordkeeping and monitoring set forth in NESHAP Subparts A (40 CFR §63.1 – 40 CFR §63.15) and PPPP (40 CFR §63.4480 – 40 CFR §63.4581).
- E. The number of hours operated each day for all emission units at the plant covered by an air construction permit.

Authority for Requirement: Iowa DNR Construction Permit 02-A-720-S3

Emission Point Characteristics

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

Stack Height (ft, from the ground): 11 ft

Stack Opening (inches): 15 x 15

Exhaust Flowrate (scfm): 850

Exhaust Temperature (°F): 70

Discharge Style: Horizontal

Authority for Requirement: Iowa DNR Construction Permit 02-A-720-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**

**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: E1, E2, E3, and E4

### Associated Equipment

**Table Sanding-1**

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity
E1	SA	Sanding Area	Masking Tape, Masking Paper, Sand Paper	17 units/day <sup>(*)</sup>
E2				
E3				
E4				

<sup>(\*)</sup> Based on construction permits for this unit.

### 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.*

**Table Sanding-2**

EP	EU	Opacity	PM (gr/dscf)	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	Iowa DNR Construction Permit #
E1	SA	40% <sup>(1)</sup>	0.1	0.30	0.30	05-A-698-S2
E2		40% <sup>(1)</sup>	0.1	0.30	0.30	05-A-699-S2
E3		40% <sup>(1)</sup>	0.1	0.30	0.30	05-A-700-S2
E4		40% <sup>(1)</sup>	0.1	0.30	0.30	05-A-701-S2

<sup>(1)</sup> An exceedance 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 exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

**Table Sanding-3**

Pollutant	Emission Limit(s)	Authority for Requirement
Opacity	40%	567 IAC 23.3(2)"d" and Iowa DNR Construction Permits Referenced in Table Sanding-2.
PM	0.1 gr/dscf	567 IAC 23.3(2)"a" and Iowa DNR Construction Permits Referenced in Table Sanding-2.
PM/PM <sub>10</sub>	0.30 lb/hr	Iowa DNR Construction Permits Referenced in Table Sanding-2.

**Operational Limits & Requirements**

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

**Operating Limits:**

A. All emission units at the plant covered by an air construction permit are limited to 12 hours of operation per day.

**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.*

A. The number of hours operated each day for all emission units at the plant covered by an air construction permit.

Authority for Requirement: Iowa DNR Construction Permits Referenced in Table Sanding-2.

**Emission Point Characteristics**

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

<b>Table Sanding-4</b>			<b>Stack Characteristics</b>				
<b>EP</b>	<b>EU</b>	<b>Construction Permit #</b>	<b>Stack Height (feet, above ground)</b>	<b>Discharge Style</b>	<b>Stack Opening (inches, dia.)</b>	<b>Exhaust Temp. (°F)</b>	<b>Exhaust Flowrate (scfm)</b>
E1	SA	05-A-698-S2	15	Horizontal	38	69	4,022
E2		05-A-699-S2	15	Horizontal	38	69	4,022
E3		05-A-700-S2	15	Horizontal	38	69	4,022
E4		05-A-701-S2	15	Horizontal	38	69	4,022

Authority for Requirement: Iowa DNR Construction Permits Referenced In Table Sanding-4

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point 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: SR1, SR2, SR3, and SR4

### Associated Equipment

**Table Spray-1**

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID & Description
SR1	SR	Spray Room	Paint	50.4 gal/hr (18 guns @ 2.8 gal/hr each)	SR1: Dry Filters
SR2					SR2: Dry Filters
SR3					SR3: Dry Filters
SR4					SR4: Dry Filters

### 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.*

**Table Spray-2**

EP	EU	Opacity	PM (gr/dscf)	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	VOC (tpy)	Total HAP (kg/kg)	Iowa DNR Construction Permit #
SR1	SR	40% <sup>(1)</sup>	0.01	0.90	0.45	249 <sup>(2)</sup>	1.34 <sup>(3)</sup>	05-A-702-S2
SR2		40% <sup>(1)</sup>	0.01	0.90	0.45			05-A-703-S2
SR3		40% <sup>(1)</sup>	0.01	0.90	0.45			05-A-704-S2
SR4		40% <sup>(1)</sup>	0.01	0.90	0.45			05-A-705-S3

<sup>(1)</sup> An exceedance 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 exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>(2)</sup> Plant-wide VOC emissions shall not exceed 249 tons per rolling 365-day period.

<sup>(3)</sup> Per 40 CFR §63.4490(b)(4), each new assembled on-road vehicle coating affected source is limited to organic hazardous air pollutant (HAP) emissions of no more than 1.34 kg (1.34 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

**Table Spray-3**

Pollutant	Emission Limit(s)	Authority for Requirement
Opacity	40%	567 IAC 23.3(2)"d" and Iowa DNR Construction Permits Referenced in Table Spray-2.
PM	0.01 gr/dscf	567 IAC 23.4(13) and Iowa DNR Construction Permits Referenced in Table Spray-2.
PM	0.90 lb/hr	Iowa DNR Construction Permits Referenced in Table Spray-2.
PM-10	0.45 lb/hr	Iowa DNR Construction Permits Referenced in Table Spray-2.
VOC	249 tpy	Iowa DNR Construction Permits Referenced in Table Spray-2.
Total HAP	1.34 kg/kg	567 IAC 23.1(4)"cp", 40 CFR 63 Subpart PPPP, and Iowa DNR Construction Permits Referenced in Table Spray-2

**Operational Limits & Requirements**

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

**NESHAP Applicability:**

This emission unit is subject to Subparts A (General Provisions; 40 CFR §63.1 – 40 CFR §63.15) and PPPP (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products; 40 CFR §63.4480 – 40 CFR §63.4581) of the National Emission Standards for Hazardous Air Pollutants (NESHAP).

**Operating Limits:**

- A. Plant-wide VOC emissions shall not exceed 249 tons per rolling 365-day period.
- B. Only HVLP guns shall be used in this emission unit.
- C. The owner or operator shall inspect and maintain the control equipment according to manufacturer's recommendations.
- D. These emission units are subject to all applicable operating limits set forth in NESHAP Subparts A (40 CFR §63.1 – 40 CFR §63.15) and PPPP (40 CFR §63.4480 – 40 CFR §63.4581).
- E. All emission units at the plant covered by an air construction permit are limited to 12 hours of operation per day.

Authority for Requirement: Iowa DNR Construction Permits Referenced in Table Spray-2

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.*

- A. A copy of the Material Safety Data Sheet for each material used in this emission unit.
- B. A log of the VOC content of each coating (as applied) used in this emission unit.
- C. A log of the daily amount of each VOC containing material used at the facility (Plant number 95-01-012). This log shall show:
  - a. The amount of each material used (in gallons),
  - b. The solids content (in weight percent),
  - c. The VOC content, and
  - d. Each Hazardous air pollutant (HAP).
  - e. Calculate and record the 365-day rolling total for VOC for each day of operation.
- D. The amount of cleaning solvent shipped off-site for recovery is allowed to be subtracted from the VOC usage tools. Records from the recovery company shall be kept which document the credit claimed and the dates shipped.
- E. A log of all inspections and maintenance of the control equipment.
- F. All applicable recordkeeping and monitoring set forth in NESHAP Subparts A (40 CFR §63.1 – 40 CFR §63.15) and PPPP (40 CFR §63.4480 – 40 CFR §63.4581).
- G. The number of hours operated each day for all emission units at the plant covered by an air construction permit.

Authority for Requirement: Iowa DNR Construction Permits Referenced in Table Spray-2

Emission Point Characteristics

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

Table Spray-4			Stack Characteristics				
EP	EU	Construction Permit #	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Exhaust Temp. (°F)	Exhaust Flowrate (scfm)
SR1	SR	05-A-702-S2	30	Vertical unobstructed	34	70	22,500
SR2		05-A-703-S2	30	Vertical unobstructed	34	70	22,500
SR3		05-A-704-S2	30	Vertical unobstructed	34	70	22,500
SR4		05-A-705-S3	30	Vertical unobstructed	34	70	22,500

Authority for Requirement: Iowa DNR Construction Permits Referenced In Table Spray-4

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may

vary with changes in the process and ambient conditions. If it is determined that any of the emission point 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**

Relevant requirements of O & M plan for this equipment: PM/PM<sub>10</sub>

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

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

**Agency Operation & Maintenance Plan for each Paint Booth in Table Spray 1**

**Weekly**

- Inspect this 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.

Authority for Requirement: 567 IAC 22.108(3)

## Emission Point ID Number: FF1, FF2, and FF3

### Associated Equipment

**Table Finish-1**

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID & Description
FF1	FF	Final Finish	Paint	33.6 gal/hr (12 guns @2.8 gal/hr each)	FF1:Dry Filters
FF2					FF2:Dry Filters
FF3					FF3:Dry Filters

### 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.*

**Table Finish-2**

EP	EU	Opacity	PM (gr/dscf)	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	VOC (tpy)	Total HAP (kg/kg)	Iowa DNR Construction Permit #
FF1	FF	40% <sup>(1)</sup>	0.01	0.29	0.15	249 <sup>(2)</sup>	1.34 <sup>(3)</sup>	05-A-706-S2
FF2		40% <sup>(1)</sup>	0.01	0.29	0.15			05-A-707-S2
FF3		40% <sup>(1)</sup>	0.01	0.29	0.15			05-A-708-S2

<sup>(1)</sup> An exceedance 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 exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

<sup>(2)</sup> Plant-wide VOC emissions shall not exceed 249 tons per rolling 365-day period.

<sup>(3)</sup> Per 40 CFR §63.4490(b)(4), each new assembled on-road vehicle coating affected source is limited to organic hazardous air pollutant (HAP) emissions of no more than 1.34 kg (1.34 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

**Table Finish-3**

Pollutant	Emission Limit(s)	Authority for Requirement
Opacity	40%	567 IAC 23.3(2)"d" and Iowa DNR Construction Permits Referenced in Table Finish-2.
PM	0.01 gr/dscf	567 IAC 23.4(13) and Iowa DNR Construction Permits Referenced in Table Finish-2.
PM PM-10	0.29 lb/hr 0.15 lb/hr	Iowa DNR Construction Permits Referenced in Table Finish-2.
VOC	249 tpy	Iowa DNR Construction Permits Referenced in Table Finish-2.
Total HAP	1.34 kg/kg	567 IAC 23.1(4)"cp", 40 CFR 63 Subpart PPPP, and Iowa DNR Construction Permits Referenced in Table Finish-2

## **Operational Limits & Requirements**

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

### **NESHAP Applicability:**

This emission unit is subject to Subparts A (General Provisions; 40 CFR §63.1 – 40 CFR §63.15) and PPPP (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products; 40 CFR §63.4480 – 40 CFR §63.4581) of the National Emission Standards for Hazardous Air Pollutants (NESHAP).

### **Operating Limits:**

- A. Plant-wide VOC emissions shall not exceed 249 tons per rolling 365-day period.
- B. Only HVLP guns shall be used in this emission unit.
- C. The owner or operator shall inspect and maintain the control equipment according to manufacturer's recommendations.
- D. This emission unit is subject to all applicable operating limits set forth in NESHAP Subparts A (40 CFR §63.1 – 40 CFR §63.15) and PPPP (40 CFR §63.4480 – 40 CFR §63.4581).
- E. All emission units at the plant covered by an air construction permit are limited to 12 hours of operation per day.

### **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.*

- A. A copy of the Material Safety Data Sheet (MSDS) for each material used in this emission unit.
- B. A log of the VOC content of each coating (as applied) used in this emission unit.
- C. A log of the daily amount of each VOC containing material used at the facility (plant number 95-01-012). This log shall show:
  - The amount of each material used (in gallons),
  - The solids content (in weight percent),
  - The VOC content, and
  - Each hazardous air pollutant (HAP)
  - Calculate and record the 365-day rolling total for VOC for each day of operation.
- D. The amount of cleaning solvent shipped off-site for recovery is allowed to be subtracted from the VOC usage totals. Records from the recovery company shall be kept which document the credit claimed and the dates shipped.
- E. A log of all inspections and maintenance of the control equipment.
- F. All applicable recordkeeping and monitoring set forth in NESHAP Subparts A (40 CFR §63.1 – 40 CFR §63.15) and PPPP (40 CFR §63.4480 – 40 CFR §63.4581).
- G. The number of hours operated each day for all emission units at the plant covered by an air construction permit.

Authority for Requirement: Iowa DNR Construction Permits Referenced in Table Finish-2

**Emission Point Characteristics**

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

Table Finish-4			Stack Characteristics				
EP	EU	Construction Permit #	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Exhaust Temp. (°F)	Exhaust Flowrate (scfm)
FF1	FF	05-A-706-S2	15	Horizontal	38	80	3,382
FF2		05-A-707-S2	15	Horizontal	38	80	3,382
FF3		05-A-708-S2	15	Horizontal	38	80	3,382

Authority for Requirement: Iowa DNR Construction Permits Referenced In Table Finish-4

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point 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**

Relevant requirements of O & M plan for this equipment: PM/PM<sub>10</sub>

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

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

## **Agency Operation & Maintenance Plan for each Paint Booth in Table Finish - 1**

### **Weekly**

- Inspect this 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.

Authority for Requirement: 567 IAC 22.108(3)

## **IV. General Conditions**

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

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

1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. *567 IAC 22.108(9)"a"*
2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. *567 IAC 22.105 (2)"h"(3)*
3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. *567 IAC 22.108 (1)"b"*
4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. *567 IAC 22.108 (14)*
5. It shall not be a defense for a permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. *567 IAC 22.108 (9)"b"*
6. For applicable requirements with which the permittee is in compliance, the permittee shall continue to comply with such requirements. For applicable requirements that will become effective during the permit term, the permittee shall meet such requirements on a timely basis. *567 IAC 22.108(15)"c"*

### **G2. Permit Expiration**

1. Except as provided in rule 567—22.104(455B), permit expiration terminates a source's right to operate unless a timely and complete application for renewal has been submitted in accordance with rule 567—22.105(455B). *567 IAC 22.116(2)*
2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall submit on forms or electronic format specified by the Department to the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, 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, 11201 Renner Blvd., Lenexa, KS 66219. Additional copies to local programs or EPA are not required for application materials submitted through the electronic format specified by the Department. The application must include all emission points, emission units, air pollution control equipment, and monitoring devices at the facility. All emissions generating activities, including fugitive emissions, must be included. The definition of a complete application is as indicated in 567 IAC 22.105(2). *567 IAC 22.105*

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

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable

inquiry, the statements and information in the document are true, accurate, and complete. 567 IAC 22.107 (4)

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

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. 567 IAC 22.108 (15)"e"

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

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

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

1. The permittee is required under subrule 567 IAC 22.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
3. The 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)"j"; 567 IAC 23.2(3)"j" - State Only*

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

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number

of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. 567 IAC 22.108(7)

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

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

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

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

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
- d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)
- e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
- f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,

5. The permittee shall be allowed to switch from any ozone-depleting 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  
11201 Renner Blvd.  
Lenexa, KS 66219  
(913) 551-7020

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

Chief, Air Quality Bureau  
Iowa Department of Natural Resources  
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

## **V. Appendix A: 40 CFR Part 63, Subpart PPPP**

**Web Link to the National Emissions Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products**

**[www.gpo.gov/fdsys/](http://www.gpo.gov/fdsys/)**

### **See Featured Collections**

- **Code of Federal Regulations**
- **Choose year**
- **Title 40**
- **Part 63**

**VI. Appendix B: IDNR Administrative Consent Order No. 2004-AQ-68**

IOWA DEPARTMENT OF NATURAL RESOURCES  
ADMINISTRATIVE ORDER

<b>IN THE MATTER OF:</b>  CDI, LLC	<b>ADMINISTRATIVE CONSENT ORDER</b>  NO. 2004-AQ-68
--	---

TO: CDI, LLC  
David Nagle, Registered Agent  
305 Nerem Drive South  
Forest City, Iowa 50436

CDI, LLC  
Madonna McGrath  
Baker & Daniels  
300 North Meridian Street  
Suite 2700  
Indianapolis, Indiana 46204-1782

**I. SUMMARY**

This consent order is entered into between CDI, LLC, (CDI) and the Iowa Department of Natural Resources (DNR) for the purpose of resolving issues relating to CDI, LLC's, failure to comply with Hazardous Air Pollutant (HAP) conditions in air quality construction permits issued by DNR and issues relating to CDI, LLC's failure to comply with the HAP emission reduction requirements contained in Section 112(g) of the Clean Air Act and 40 Code of Federal Regulations (CFR), Part 63, Subpart B, which has been adopted by reference by DNR at 567 Iowa Administrative Code (IAC) 23.1(4)(b)(1). The parties desire to avoid litigation and settle without hearing or adjudication of any issue of fact or law.

**II. STATEMENT OF FACTS**

1. CDI has a facility located at 305 Nerem Drive South in Forest City, Iowa. CDI paints mobile homes. Some of the sources of emissions to the outside atmosphere at this facility include paint booths, paint kitchens, and drying ovens. CDI's Forest City facility began operating on September 27, 2002.

2. CDI failed to comply with the Hazardous Air Pollutant (HAP) usage limits contained in its air quality construction permits. On November 19, 2003, Glenn Carper of DNR Field Office 2 conducted an air quality inspection at CDI. During this inspection, Mr. Carper documented violations of eleven construction permits containing plant-wide emission limits. According to condition 14 of each of the construction permits issued by DNR on September 16, 2002, the maximum total usage of HAP-

**IOWA DEPARTMENT OF NATURAL RESOURCES  
ADMINISTRATIVE CONSENT ORDER  
ISSUED TO: CDI, LLC.**

emitting substances (paints and cleaning solvents) for emission points permitted as part of Project No. 02-355 should not exceed 9.4 tons per year for a single HAP or 24.4 tons per year for combined HAPs, calculating each operating day on a 365-day rolling total. The following table summarizes the construction permits affected.

<b>Construction Permit No.</b>	<b>Emission Point No.</b>	<b>Emission Units</b>
02-A-720-P	EP MR-1	Paint Mix Room
02-A-479-P	EP BC 1	Basecoat Paint Booth and 3 mmbtu/hr Natural Gas Fired Oven, Stack 1
02-A-480-P	EP BC 2	Basecoat Paint Booth and 3 mmbtu/hr Natural Gas Fired Oven, Stack 2
02-A-481-P	EP TC 1	Topcoat Paint Booth 1 and 3 mmbtu/hr Natural Gas Fired Oven, Stack 1
02-A-482-P	EP TC 2	Topcoat Paint Booth 1 and 3 mmbtu/hr Natural Gas Fired Oven, Stack 2
02-A-483-P	EP TC 3	Topcoat Paint Booth 2 and 3 mmbtu/hr Natural Gas Fired Oven, Stack 1
02-A-484-P	EP TC 4	Topcoat Paint Booth 2 and 3 mmbtu/hr Natural Gas Fired Oven, Stack 2
02-A-485-P	EP TC 5	Topcoat Paint Booth 3 and 3 mmbtu/hr Natural Gas Fired Oven, Stack 1
02-A-486-P	EP TC 6	Topcoat Paint Booth 3 and 3 mmbtu/hr Natural Gas Fired Oven, Stack 2
02-A-487-P	EP E 1	Sanding Area Exhaust, Stack 1
02-A-488-P	EP E 2	Sanding Area Exhaust, Stack 2

The records observed by Mr. Carper at the facility indicated that CDI's total combined HAP usage from January through October 2003 was 38.55 tons. When the amount of HAPs recycled (6.14 tons) is removed, the actual amount of HAPs emitted into the outside atmosphere during this period was 32.41 tons. On November 26, 2003, DNR issued a Notice of Violation letter to CDI for the violations discovered during the November 19, 2003, inspection.

3. In addition to CDI's failure to comply with the conditions of its construction permits, CDI violated the provisions of Section 112(g) of the Clean Air Act (42 United States Code § 7412) when CDI exceeded its HAP usage limit of 24.4 tons per year. Section 112(g) of the Clean Air Act is intended, in part, to ensure that emissions of HAPs do not increase in the interim period if a facility is constructed or reconstructed

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ADMINISTRATIVE CONSENT ORDER  
ISSUED TO: CDI, LLC.**

before the Environmental Protection Agency (EPA) issues a final Maximum Achievable Control Technology (MACT) regulation or an air toxics regulation for that particular category of sources or facilities. According to 567 IAC 22.1(1)(b), the owner or operator of a new or reconstructed major source of hazardous air pollutants subject to Section 112(g) must apply to DNR for a construction permit which would require that MACT be applied to the new or reconstructed major source. According to 567 IAC 23.1(4)(b)(1), these construction permit applications shall contain applications for case-by-case MACT determinations. The Section 112(g) requirements are applicable to new or reconstructed equipment with the potential to emit more than 10 tons per year of a single HAP or 25 tons per year of combined HAPs.

4. When CDI began operations at its Forest City, Iowa, facility on September 27, 2002, it had established synthetic minor status for Section 112(g), due to the HAP usage limit of 9.4 tons for single HAPs and 24.4 tons per year for combined HAPs contained in its permits. However, when CDI failed to comply with its permitted limits and exceeded 25 tons per year of combined HAP emissions, CDI became subject to the requirements of Section 112(g).

5. On December 4, 2002, EPA published a proposed MACT rule which, when final, would regulate the CDI Forest City facility. On April 19, 2004, EPA published as a final rule the National Emission Standard for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR Part 63, Subpart PPPP. When CDI failed to comply with the conditions of its construction permits, CDI became subject to both Section 112(g) and these newly-adopted MACT provisions.

6. On April 21, 2004, DNR issued a Notice of Violation letter to CDI for violating Section 112(g) of the Clean Air Act. Since the issuance of the Notice of Violation letter, CDI has proposed a compliance plan which has been approved by DNR. A copy of the compliance plan is attached as Exhibit "A".

7. On May 21, 2003, DNR issued a Notice of Violation letter to CDI for failure to timely submit a Title V application. On July 22, 2004, DNR issued a Notice of Violation letter to CDI for failure to timely submit its Title V emissions inventory for emission year 2003. While no penalty is assessed for these alleged violations, the issuance of these two Notice of Violation letters indicates that CDI was specifically made aware of Iowa's air quality programs.

8. On October 7, 2004, CDI requested in an email that DNR modify its construction permits to be consistent with the requirements of Subpart PPPP. CDI currently has construction permit applications in-house at DNR for the affected emission points, but those permit applications do not address Subpart PPPP.

**III. CONCLUSIONS OF LAW**

1. Pursuant to the provisions of Iowa Code sections 455B.134(9) and

**IOWA DEPARTMENT OF NATURAL RESOURCES  
ADMINISTRATIVE CONSENT ORDER  
ISSUED TO: CDI, LLC.**

455B.138(1), which authorize the Director to issue any order necessary to secure compliance with or prevent a violation of Iowa Code chapter 455B, Division II (air quality), and the rules promulgated and permits issued pursuant thereto; and Iowa Code section 455B.109 and 567 Iowa Administrative Code (IAC) chapter 10, which authorize the Director to assess administrative penalties, this Department has jurisdiction to issue this order.

2. Iowa Code section 455B.133 provides the Environmental Protection Commission with authority to establish rules governing the quality of air and emission standards. Iowa Code section 455B.133(6) provides that the Commission, shall require, by rule, notice of the construction of any air contaminant source which causes or contributes to air pollution, and the submission of plans and specifications to the department, or other information deemed necessary for the installation of air contaminant sources and regulated control equipment.

3. Iowa Code sections 455B.133 and 455B.134, and 567 IAC 22.3(1), allows DNR to issue permits subject to conditions specified in writing. Such conditions may include but are not limited to emissions limits, operating conditions, fuel specifications compliance testing, continuous monitoring, and excess emissions reporting. CDI has failed to comply with some of the conditions of its construction permits, as stated above.

4. Section 112(g) of the Clean Air Act (42 United States Code § 7412) is applicable to facilities emitting more than 10 tons per year of a single HAP or more than 25 tons per year of combined HAPs. CDI is subject to the requirements of Section 112(g) because it has emitted more than 25 tons per year of combined HAPs, as stated above.

5. According to the provisions of 40 Code of Federal Regulations (CFR) Part 63, Subpart B, adopted by reference at 567 IAC 23.1(4)(b)(1), facilities subject to Section 112(g) are required to obtain an approved MACT determination from the permitting authority (DNR) for all new or reconstructed equipment with the potential to emit more than 10 tons per year of a single HAP or more than 25 tons per year of combined HAPs. CDI is subject to the requirements of these provisions because it has emitted more than 25 tons per year of combined HAPs, as stated above.

6. According to the provisions of 567 IAC 22.1(1)(b), the owner or operator of a new or reconstructed major source of hazardous air pollutants subject to Section 112(g) must apply to DNR for a construction permit which would require that MACT be applied to the new or reconstructed major source. According to the provisions of 567 IAC 23.1(4)(b)(1), construction permit applications shall contain applications for case-by-case MACT determinations.

7. CDI is an affected facility according to the provisions of the National Emission Standard for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR Part 63, Subpart PPPP.

IOWA DEPARTMENT OF NATURAL RESOURCES  
ADMINISTRATIVE CONSENT ORDER  
ISSUED TO: CDI, LLC.

IV. ORDER

THEREFORE, DNR orders and CDI agrees to the following:

1. CDI shall immediately comply with the requirements of Clean Air Act Section 112(g) at its Forest City facility by implementing one of the control strategies specified in the National Emission Standard for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR Part 63, Subpart PPPP;
2. In the future, CDI shall comply with the conditions of its construction permits; and
3. Within 30 days of the date the Director signs this order, CDI shall pay a penalty of \$8,000.00.

V. WAIVER OF APPEAL RIGHTS

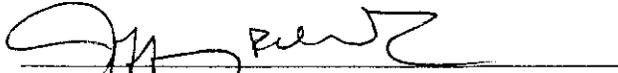
This administrative consent order is entered into knowingly by and with the consent of CDI, LLC. For that reason, CDI, LLC, waives its right to appeal this order pursuant to the provisions of Iowa Code section 455B.138.

VI. NO ADMISSION

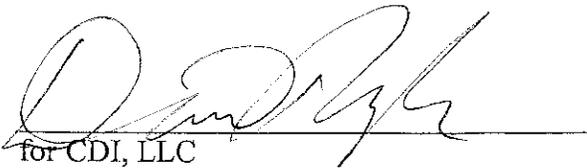
CDI's entry into the terms of this Consent Order does not constitute an admission of any violations alleged herein.

VII. NONCOMPLIANCE

Failure to comply with the provisions of this order may result in the imposition of administrative penalties or referral to the Attorney General to obtain injunctive relief and civil penalties pursuant to Iowa Code section 455B.146. The Department reserves the right to request that the Attorney General initiate legal action if this order is violated.

  
\_\_\_\_\_  
JEFFREY R. VONK, DIRECTOR  
Iowa Department of Natural Resources

Dated this 27 day of  
December, 2004.

  
\_\_\_\_\_  
for CDI, LLC

Dated this 15 day of  
December, 2004.

## **Exhibit "A"**

### **Compliance Plan**

CDI shall meet the requirements of Clean Air Act Section 112(g) by immediately implementing the requirements of the NESHAP for Surface Coating of Plastic Parts and Products, 40 CFR Part 63, Subpart PPPP.

CDI shall implement the "emission rate without add-on controls" option of Subpart PPPP, as follows:

- CDI shall limit the facility's organic HAP emissions to no more than 1.34 kg (1.34 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.
- CDI shall use 0.00 organic HAP cleaning material and flushing solvent where possible to further reduce organic HAP emissions.
- CDI shall use as the reducer in major usage paints a reducer with 0.36 lbs of organic HAP per gallon, where possible.
- To show compliance with Clean Air Act Section 112(g), CDI shall immediately comply with the notification, recordkeeping and reporting requirements of Subpart PPPP found in 40 CFR 63.4551 (initial compliance demonstrations) and 63.4552 (continuous compliance demonstrations).