



EXEMPTION JUSTIFICATION DOCUMENT TEMPLATE

An owner or operator that utilizes the small unit exemption as specified in 567 IAC 22.1(2)"w" must maintain on-site an exemption justification document. The exemption justification document demonstrates conformance and compliance with the emission rate limits contained in the definition of "small unit" for each emission unit or group of similar emission units that will be covered under the exemption. The minimum information requirements for an exemption justification document are contained in 567 IAC 22.1(2)"w." However, there is no specified format for an exemption justification document. This template is intended to provide an example exemption justification document only and reflects the minimum information that should be included in it.

Facility Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Emission Point ID: _____

Emission Unit(s) Description: _____

CONTROL EQUIPMENT (if applicable)

Type: _____

Pollutant Controlled: _____ % Captured: _____ % Control Efficiency: _____

(Note: If control efficiency information is not available from the manufacturer, control efficiencies acceptable to the department can be obtained from the "Iowa Title V Operating Permit Control Efficiency Table" (<http://www.iowadnr.gov/Environmental-Protection/Air-Quality/Operating-Permits/Title-V-Technical-Guidance>) and EPA's AP-42 Compilation Air Pollutant Emission Factors, Volume I, Stationary Point and Area Sources (<http://www.epa.gov/ttn/chief/ap42/index.html>). If you have questions regarding the appropriate percent capture and control efficiencies to use, please call 1-877-AIR-IOWA)

Initials

Responsible Official: Check the appropriate box(s) below and initials:

- _____ ☐ The emission unit(s) will not be operated without the pollution control device operating.
- _____ ☐ A report of the manufacturer's emission testing or other emissions testing was available and is attached to this document.

OPERATIONAL LIMITS

(Specify all operational restrictions that must be maintained to ensure actual emissions remain within the small unit exemption emission limits.)

Hours of Operation: _____ Material Throughput: _____

Other: _____

NARRATIVE

Provide a narrative description of how the emissions from the emission unit or group of similar emission units were determined and maintained at or below the annual small unit exemption levels:

CALCULATIONS

Provide detailed emission calculations reflecting control devices and operational limits specified above. The resulting emission rates establish a limit on the potential emissions from that emission unit or group of similar emission units. (Note: Calculations must reflect both the controlled and uncontrolled emissions. For example, an emissions unit with a capture hood that is 80% efficient and a baghouse that is 95% efficient will have an emission rate that is the sum of the 95% control on 80% of the emissions from the baghouse stack and the remaining 20% of the emissions not captured by the hood. If you have questions regarding the emission calculations, please call 1-877-AIR-IOWA.)

☐ This emission unit(s) qualifies as a “substantial small unit” as defined in 567 IAC 22.1(2)“w”(6).

☐ The cumulative emissions for all “substantial small units” has been reviewed to ensure that the cumulative notice threshold defined in 567 IAC 22.1(2)“w”(8) has not been exceeded. (See cumulative emissions summary sheet attachment.)

Note: DNR must be notified in writing 10 days prior to commencing construction of any new or modified substantial small unit and within 30 days after determining that an existing small unit meets the criteria for a substantial small unit. Additionally, DNR must be notified within 90 days of the end of the calendar year for which the aggregate emissions from substantial small units have reached any of the cumulative notice thresholds.

Specify records of actual operation that will be used as objective evidence that the actual annual emissions are maintained under the small unit exemption levels. All records demonstrating compliance with each exemption justification document shall be maintained for five years. Records shall include 12-month rolling totals where appropriate.

STATEMENT OF CERTIFICATION OF COMPLIANCE

“I certify that the information contained in this document accurately reflects the actual operating conditions and that the emission unit(s) included in this exemption status will continue to operate under the small unit exemption thresholds as specified in 567 IAC 22.1(2) “w”(1). I also understand that this exemption justification document must be made available for review during normal business hours and for state or EPA on-site inspections, and shall be provided to the Director of the Department of Natural Resources or the Director’s representative upon request.”

Signature of Responsible Official

Title of Responsible Official

Printed Name of Responsible Official

Date Signed