PUBLIC NOTICE

The Iowa Department of Natural Resources (DNR) is proposing to renew the Title V Operating Permit for Altec Industries, Inc. This facility is located at 1001 Furnas Drive, Osceola, IA 50213. DNR is currently reviewing an application for renewal submitted by Altec Industries, Inc to operate their existing Truck and Bus Bodies facility.

Altec Industries, Inc. is required to obtain a Title V Operating Permit pursuant to 567 Iowa Administrative Code (IAC) 24.101. This facility has the potential to emit the following air pollutants annually:

- PM-2.5 (particulate matter 2.5 microns or less in diameter): 13.40 tons
- PM-10 (particulate matter ten microns or less in diameter): 13.40 tons
- Particulate Matter: 22.16 tons
- Sulfur Dioxide: 0.00 tons
- Nitrogen Oxides: 0.00 tons
- Volatile Organic Compounds: 120.00 tons
- Carbon Monoxide: 0.00 tons
- Lead: 0.00 tons
- Hazardous Air Pollutants: 95.00 tons

Based on the information provided in the Title V Operating Permit renewal application, the DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 24.107.

A copy of the Public Notice is available for public inspection at the:
OSCEOLA PUBLIC LIBRARY
300 S. FILLMORE ST.
OSCEOLA, IA 50213
Phone: 641-342-2237

These documents are also available on the Air Quality Bureau's website at:www.iowadnr.gov/titlev-draft

For additional information or for a copy of the draft permit or fact sheet contact:
DEREK WEDEMEIER
IOWA DEPARTMENT OF NATURAL RESOURCES - AIR QUALITY BUREAU
6200 PARK STE #200
DES MOINES, IOWA 50321
Phone: (515) 725-9520
E-mail: derek.wedemeier@dnr.iowa.gov

A complete record of the permit review, including the renewal application and the draft permit, is available for public inspection Monday-Friday, 8:00 a.m. - 4:30 p.m., at the DNR address shown above.

The public comment period for the draft permit will run from November 19, 2026 through December 19, 2026. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Derek Wedemeier at the DNR address shown above. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period.

Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to Derek Wedemeier at the DNR address shown above.

DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the renewal application. The responsiveness summary and the final permit will be available to the public upon request.

Individuals with disabilities or limited English proficiency are encouraged to participate in all DNR activities, including submitting public comments. If a reasonable accommodation or language services are needed to participate, contact the Air Quality Bureau staff member listed or Relay Iowa TTY Service at 800-735-7942 in advance to advise them of your specific needs. DNR's language access and disability nondiscrimination plans are available at https://www.iowadnr.gov/about/nondiscrimination-accessibility-language-access.

Iowa Department of Natural Resources
Draft Title V Operating Permit

Name of Permitted Facility: Altec Industries, Inc.
Facility Location: 1001 Furnas Dr., Osceola, IA 50213
Air Quality Operating Permit Number: 09-TV-003R3
Expiration Date: **Date**
Permit Renewal Application Deadline: **DATE**

EIQ Number: 92-4329
Facility File Number: 20-01-018

Responsible Official
Name: Tyler Sheeley
Title: General Manager
Mailing Address: 1001 Furnas Drive, Osceola, IA 50213
Phone #: 641-223-8766

Permit Contact Person for the Facility
Name: Kimberly Schappaugh
Title: Corporate Environmental Regulatory Manager
Mailing Address: 33 Inverness Center Drive, Birmingham, AL 35242
Phone #: 770-901-1264

This permit is issued in accordance with 567 Iowa Administrative Code Chapter 24, and is issued subject to the terms and conditions contained in this permit.

For the Director of the Department of Natural Resources

Corey McCoid, Supervisor of Air Operating Permits Section Date

Table of Contents

I. Facility Description and Equipment List **4**

II. Plant - Wide Conditions **6**

III. Emission Point Specific Conditions **11**

IV. General Conditions **58**

G1. Duty to Comply
G2. Permit Expiration
G3. Certification Requirement for Title V Related Documents
G4. Annual Compliance Certification
G5. Semi-Annual Monitoring Report
G6. Annual Fee
G7. Inspection of Premises, Records, Equipment, Methods and Discharges
G8. Duty to Provide Information
G9. General Maintenance and Repair Duties
G10. Recordkeeping Requirements for Compliance Monitoring
G11. Evidence used in establishing that a violation has or is occurring.
G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification
G13. Hazardous Release
G14. Excess Emissions and Excess Emissions Reporting Requirements
G15. Permit Deviation Reporting Requirements
G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations
G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification
G18. Duty to Modify a Title V Permit
G19. Duty to Obtain Construction Permits
G20. Asbestos
G21. Open Burning
G22. Acid Rain (Title IV) Emissions Allowances
G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements
G24. Permit Reopenings
G25. Permit Shield
G26. Severability
G27. Property Rights
G28. Transferability
G29. Disclaimer
G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification
G31. Prevention of Air Pollution Emergency Episodes
G32. Contacts List

V. Appendix A: NESHAP **69**

Abbreviations

acfm.....actual cubic feet per minute
CFR.....Code of Federal Regulation
CE .....control equipment
CEM.....continuous emission monitor
°F.....degrees Fahrenheit
EIQ.....emissions inventory questionnaire
EP.....emission point
EU .....emission unit
gr./dscf .....grains per dry standard cubic foot
IAC.....Iowa Administrative Code
IDNR.....Iowa Department of Natural Resources
NAICS.....North American Industry Classification System
NSPS .....new source performance standard
ppmv .....parts per million by volume
lb./hr.....pounds per hour
lb./MMBtu .....pounds per million British thermal units
SCC.....Source Classification Codes
scfm.....standard cubic feet per minute
SIC .....Standard Industrial Classification
TPY .....tons per year
USEPA.....United States Environmental Protection Agency

Pollutants
PM.....particulate matter
PM_{10}.....particulate matter ten microns or less in diameter
$PM_{2.5}$ .....particulate matter 2.5 microns or less in diameter
SO_2 .....sulfur dioxide
NO_x .....nitrogen oxides
VOC.....volatile organic compound
CO.....carbon monoxide
HAP.....hazardous air pollutant

I. Facility Description and Equipment List

Facility Name: Altec Industries, Inc.
Permit Number: 09-TV-003R3

Facility Description: This facility manufactures reinforced plastic composite parts for utility truck bodies. (SIC 3713)

Equipment List

Emission Point Number	Emission Unit Number	Emission Unit Description	Construction Permit Number
EP-1A	EU-1A	Resin Chop Spray Booth	15-A-037-S1
EP-1B			15-A-038-S1
EP-2A	EU-2A	Flat Gel Coat/Flat Chop Spray Booth	15-A-039-S1
EP-2B			15-A-040-S1
EP-3A	EU-3A	Gel Coat Spray Booth	15-A-041-S1
EP-3B			15-A-042-S1
EP-4A	EU-4A	Paint Spray Booth #1	15-A-043-S1
EP-4B			15-A-044-S1
EP-9	EU-9A	Hand Lay-up resin application	15-A-046-S2
	EU-9B	Manual gel coat spray application	
EP-10A	EU-10	Mold Shop	15-A-059-S1
EP-10B			15-A-060-S1
EP-11A	EU-11	Flat Gel Coat/Flat Chop Spray Booth #2	15-A-061-S1
EP-11B			15-A-062-S1
EP-13	EU-13	Spray Touch-Up and Repair	23-A-176-S1
EP-14	EU-14	Hand Lay-up Operations	23-A-177-S1
EP-15	EU-15	Paint Spray Booth #2	25-A-065
EP-16	EU-16	North Building Welders South Building Welders	25-A-066-S1

Insignificant Activities Equipment List

Emission Unit	Description
EU-100	Bondo Application
EU-101	Buffing
EU-102	Shelving Adhesives
EU-103	Silicone Application
EU-105	Welding Gases
EU-106	Door Bonding
EU-107	Mold Preparation
EU-108	Bulkhead Adhesive
EU-111	Parts Water Heater (0.332 MMBtu/hr)
EU-112	Weather Rite Heater (0.65 MMBtu/hr)
EU-113	Hastings Heater (1.076 MMBtu/hr)
EU-114	Rapid Air #1 Heater (3.85 MMBtu/hr)

Emission Unit	Description
EU-115	Rapid Air #2 Heater (3.85 MMBtu/hr)
EU-116	Rapid Air #3 Heater (1.65 MMBtu/hr)
EU-118	Polyurethane Application
EU-119	Sanding Booth
EU-120	Heater, 0.65 MMBTU/hr
EU-121	Heater, 0.32 MMBTU/hr
EU-122	Heater, 0.32 MMBTU/hr
EU-123	Heater, 1.5 MMBTU/hr
EU-124	Heater, 1.5 MMBTU/hr
EU-125	Heater, 1.5 MMBTU/hr
EU-126	Heater, 1.5 MMBTU/hr
EU-127	Heater, 1.5 MMBTU/hr
EU-128	Heater, 1.5 MMBTU/hr
EU-129	Heater, 1 MMBTU/hr
EU-130	Resin Storage Tank
EU-131	Body Trim
EU-132	CNC Router
EU-133	2 Laser Cutters
EU-135	0.4 MMBtu/hr Heater
EU-136	0.2 MMBtu/hr Heater
EU-137	0.175 MMBtu/hr Heater
EU-138	0.155 MMBtu/hr Heater
EU-139	0.155 MMBtu/hr Heater
EU-140	0.2 MMBtu/hr Heater
EU-141	0.075 MMBtu/hr Heater
EU-142	0.15 MMBtu/hr Heater
EU-143	0.40 MMBtu/hr Heater
EU-144	2.288 MMBtu/hr Heater
EU-145	12kW Laser Cutter
EU-146	4.4 kW Tube Cutter
EU-147	Shot Blasting Unit
EU-148	Plasma Torch

II. Plant-Wide Conditions

Facility Name: Altec Osceola Body Plant
Permit Number: 09-TV-003R3

Permit conditions are established in accord with 567 Iowa Administrative Code rule 24.108.

Permit Duration

The term of this permit is: 5 years
Commencing on: **DATE**
Ending on: **DATE**

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 24.110 - 24.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 24.115.

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_2): 500 parts per million by volume
Authority for Requirement: 567 IAC 23.3(3)"e"

Particulate Matter:
No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed on or after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas, except as provided in 567 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – Chapter 24.

For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B).
Authority for Requirement: 567 IAC 23.3(2)"a"

Fugitive Dust: Attainment and Unclassified Areas - A person shall take reasonable precautions to prevent particulate matter from becoming airborne in quantities sufficient to cause a nuisance as defined in Iowa Code section 657.1 when the person allows, causes or permits any materials to be handled, transported or stored or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved roads. Ordinary travel includes routine traffic and road maintenance activities such as scarifying, compacting, transporting road maintenance surfacing material, and scraping of the unpaved public road surface. (the preceding sentence is State Only) All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of

visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The public highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule. Reasonable precautions may include, but not be limited to, the following procedures.

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

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

NESHAP Requirements

40 CFR Part 63, Subpart WWWW

This facility has emission units that are considered affected sources under Subparts A (General Provisions, 40 CFR §63.1 – 40 CFR §63.15) and WWWW [National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production, 40 CFR §63.5780 – 40 CFR §63.5935] of the National Emission Standard for Hazardous Air Pollutants (NESHAP). Per the applicability criteria in Sec. 63.5785 and the definition of a new affected source in Sec 63.5795, these are new sources subject to 40 CFR Subpart WWWW. This subpart is linked in Appendix A to this permit, and hereby incorporated by reference is 40 CFR 63 Subpart WWWW.

The permittee shall comply with all applicable requirements of Subpart WWWW. This facility must demonstrate compliance with the standards upon start-up as it is a new source that is a major source at startup. The initial notification was received June 22, 2007. The notification of compliance status was received on May 23, 2008.

This existing facility does not have any centrifugal casting or continuous lamination/casting operations. Therefore, according to 40 CFR §63.5805, they must meet the annual average organic HAP emissions limits in Table 3 to subpart WWWW and the work practice standards in Table 4 to subpart WWWW that apply. The closed molding operations are subject to Table 9.

Emission Limits (§ 63.5935)

Table 3 to Subpart WWWW of Part 63 – summarizes the emission limits for various types of processes, all emitting less than 100 TPY of HAP. Below are the operations at this facility that are subject to the limitations in Table 3 of Subpart WWWW.

Type of Operation	Type of Application	HAP Emission Limit	Type of Resin	Use if < 33% organic HAP (19% organic HAP for non-atomized gel coat)	Use if 33% or more organic HAP (19% organic HAP for non-atomized gel coat)
Open molding – non-corrosive resistant or high strength	Mechanical resin application	88 lb/ton	Nonatomized mechanical resin application/ nonvapor-suppressed resin	EF = 0.107x %HAP x 2,000	EF = ((0.157 x %HAP)- 0.0165) x 2,000
Open molding – gel coat	Pigmented gel coating	377 lb/ton	Atomized spray gel coat application/ nonvapor-suppressed gel coat	EF = 0.445 x %HAP x 2,000	EF = ((1.03646 x %HAP)– 0.195) x 2,000
	White gel coating	267 lb/ton			
	Tooling gel coating	440 lb/ton			

Table 8 to Subpart WWWW of Part 63 – summarizes the initial compliance with organic HAP emission limits. As required in 40 CFR 63.5860(a) initial compliance with organic HAP emission limits must be demonstrated by one of the following options:

i) You have met the appropriate organic HAP emissions limits for these operations as calculated using the procedures in 63.5810 on a 12-month rolling average one year after the appropriate compliance date, and/or

ii) You demonstrate that any individual resins or gel coats not included in (i) above, as applied, meet their applicable emission limits, or

iii) You demonstrate using the appropriate values in Table 7 to subpart WWWW that the weighted average of all resins and gel coats for each resin type and application method meet the appropriate organic HAP contents.

Work Practice Standards (§ 63.5935)

Table 4 to Subpart WWWW of Part 63 – summarizes the Work Practice Standards as required in 40 CFR 63.5805. Below are the operations at this facility that are subject to the Work Practice Standards in Table 4 of Subpart WWWW and the means to demonstrate initial compliance listed in Table 9 to Subpart WWWW of Part 63.

Type of operation	Work Practice Standard	Initial Compliance
New - cleaning operation	Must not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin between storage and applying resin to the mold or reinforcement.	The owner or operator must submit a certified statement in the notice of compliance status that all cleaning materials, except styrene contained in closed systems, or materials used to clean cured resin from application equipment contain no HAP.
New - materials HAP-containing materials storage operation	Must keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.	The owner or operator must submit a certified statement in the notice of compliance status that all HAP-containing storage containers are kept closed or covered except when adding or removing materials, and that any bulk storage tanks are vented only as necessary for safety.
New- closed molding operation using	Must uncover, unwrap or expose only one charge per mold cycle per compression/injection molding	The owner or operator submits a certified statement in the notice of

Type of operation	Work Practice Standard	Initial Compliance
compression/injection molding	machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting	compliance status that only one charge is uncovered, unwrapped, or exposed per mold cycle per compression/injection molding machine, or prior to the loader, hoppers are closed except when adding materials, and materials are recovered after slitting.

Requirement for Reports (§ 63.5910)

1. Per Part 63.5810, to determine compliance with the organic HAP limits, the necessary calculations must be completed within 30 days after the end of each month.
2. As required in 63.5910 you must submit a compliance report semiannually according to the requirements in 63.5910(b). See Table 14 in 40 CFR Part 63 Subpart WWWW.
3. As required in 63.5910 you must submit an immediate startup, shutdown, and malfunction report if you had a startup, shutdown or malfunction during the reporting period that is not consistent with your startup, shutdown, and malfunction plan. See Table 14 in 40 CFR Part 63 Subpart WWWW.

Authority for Requirement: DNR Construction Permits 15-A-037-S1, 15-A-038-S1, 15-A-039-S1, 15-A-040-S1, 15-A-041-S1, 15-A-042-S1, 15-A-046-S2, 15-A-059-S1, 15-A-060-S1, 15-A-061-S1, 15-A-062-S1, 23-A-176-S1, 23-A-177-S1
40 CFR Part 63 Subpart WWWW
567 IAC 23.1(4)"cw"

40 CFR Part 63, Subpart MMMM

Two spray booths (EU-4A and EU-15) at this facility are an affected source under Subparts A (General Provisions, 40 CFR §63.1 – 40 CFR §63.15) and MMMM [National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR §63.3880 – 40 CFR §63.3981] of the National Emission Standard for Hazardous Air Pollutants (NESHAP).

The affected sources are the collection of all the items listed in paragraphs (b)(1) through (4) of section 63.3882 that are used for surface coating of miscellaneous metal parts and products within each subcategory.

(1) All coating operations as defined in 63.3981
(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed.
(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials.
(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

Per the applicability criteria in Sec. 63.3881 and the definitions of Sec 63.3882, the source at this facility is considered a new source subject to 40 CFR Subpart MMMM. Attached as Appendix A to this permit, and hereby incorporated by reference is 40 CFR 63 Subpart MMMM. The full rule text is linked in Appendix A(including work practice standards).

The permittee shall comply with all applicable requirements of Subpart MMMM. If the initial startup of your new or reconstructed affected source occurs after January 2, 2004, the compliance date is the date of initial startup of your affected source. Initial notification was received July 18th, 2007. The compliance status notification was received July 31, 2008.

Emission Limits (§ 63.3890)

There are two units that may be subject to Subpart MMMM if they meet the definition of affected source and use 250 gal. or more per year of coatings that contain HAPs. Below is a table of the five source categories and the organic HAP limit for new sources. See section 63.3890 for a complete definition of each source category.

Organic HAP Emission Limits	**Existing Source**
General	1.9 lb HAP/gal of coating solids
High Performance Source	27.5 lb HAP/gal of coating solids
Magnet Wire	0.44 lb HAP/gal of coating solids
Rubber to Metal	6.8 lb HAP/gal of coating solids
Extreme Performance	12.4 lb HAP/gal of coating solids

Compliance Options (§63.3900)

You must include all coatings (as defined in Section 63.3981), thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in Section 63.3890. To make this determination, you must use at least one of the three compliance options summarized below.

A) Compliant material option – coatings are less than or equal to the limit. Thinners, additives and cleaning materials do NOT contain any HAPs.

B) Emission rate without add-on control – Taking all materials into account, the organic HAP emission rate is less than or equal to the applicable limit determined on a monthly basis.

C) Emission rate with add-on control – Taking all materials into account, the organic HAP emission rate is less than or equal to the applicable limit determined on a monthly basis, but with the use of control equipment.

* If the facility selects compliance option A or B, they are not required to meet any operating limits or work practice standards.

Notifications, Reports and Records (§63.3910)

A. Notifications
   1. Initial notification for new facility – No later than 120 days after initial startup.
   2. Initial compliance status – The facility must submit a Notification of Compliance Status within 30 days after the end of the initial 12-month compliance period.

B. Reports
   1. Semi-annual compliance reports
   2. Performance test reports (if using add-on control)
   3. Start-up, shutdown, malfunction report (if using add-on control)

C. Records (See Section 63.3930 for a complete list of requirements)
   1. Copy of each notification and report
   2. Information from materials suppliers
   3. Record of each type of operation
   4. Record of HAP content

Authority for Requirement: DNR Construction Permit 15-A-043-S1, 15-A-044-S1, 25-A-065
40 CFR Part 63 Subpart MMMM
567 IAC 23.1(3) "cm"

III. Emission Point-Specific Conditions

Facility Name: Altec Osceola Body Plant
Permit Number: **09-TV-003R3**

Emission Point ID Number: EP-1A & EP-1B

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-1A	Resin Chop Spray Booth	CE-1A: Dry Filter	Resin, Fiberglass Chop, Catalyst	761 lb/hr Resin	15-A-037-S1, 15-A-038-S1

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)
The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 40%(1)
Authority for Requirement: DNR Construction Permit 15-A-037-S1 & 15-A-038-S1
567 IAC 23.3(2)"d"

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

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 0.20 lb/hr
Authority for Requirement: DNR Construction Permits 15-A-037-S1 & 15-A-038-S1

Pollutant: Particulate Matter (PM)
Emission Limit(s): 1.20 lb/hr, 0.1 gr/dscf
Authority for Requirement: DNR Construction Permits 15-A-037-S1 & 15-A-038-S1
567 IAC 23.3(2)"a"

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit(s): 120.0 tons/yr(2)
Authority for Requirement: DNR Construction Permits 15-A-037-S1 & 15-A-038-S1

Pollutant: Total HAP
Emission Limit(s): 95.0 tons/yr(2), 88 lb Organic HAP/ton of resin
Authority for Requirement: DNR Construction Permits 15-A-037-S1 & 15-A-038-S1;
40 CFR Part 63 Subpart WWWW
567 IAC 23.1(4)"cw"

(2) Limits apply to the following emissions units: Resin Chop Spray Booth (EU-1A), Flat Gel Coat/Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Manual Gel Coat Spray Application (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15). The Total HAP limit is established so that the facility is not subject to the requirements of §63.5805(d)(1).

Operational Limits & Reporting/Record keeping Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

Operating Limits

1. Resin shall be applied in the Resin Chop Spray Booth (EU-1A) by using a spray gun that meets the definition of nonatomized mechanical resin application from §63.5935 of Part 63, Subpart WWWW. The spray gun must be operated according to the manufacturer's directions, including instructions to prevent the operation of the spray gun at excessive spray pressure. Examples of nonatomized application include flow coaters, pressure fed rollers and fluid impingement spray guns.
2. A maximum of one spray gun shall be used in Resin Chop Spray Booth (EU-1A) at any one time.
3. The dry filters (CE-1A) used in Resin Chop Spray Booth (EU-1A) shall be operated and maintained in accordance with the recommendations of the manufacturer. A double filter system shall be used (i.e. two filters in series). The pressure drop across the dry filters shall be maintained within the range recommended by the manufacturer.
4. The clean-up solvent used in the Resin Chop Spray Booth (EU-1A) shall not contain any VOC or HAP.
5. The facility must be in compliance at all times with the following work practice standards from Table 4 of subpart WWWW:
    a. The permittee must keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
    b. Mixers used to blend or agitate HAP-containing materials in vessels larger than 5.0 gallons shall meet the following requirements:
        i. A cover shall be used on the mixer with no visible gaps, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;
        ii. The mixer vents shall be kept closed when actual mixing is occurring except that venting is allowed during the addition of materials or as necessary prior to adding materials or opening the cover for safety; and
        iii. The mixer covers shall be closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

Reporting and Recordkeeping

1. The permittee shall keep records on the identification, the HAP content, and the VOC content of each resin, catalyst material, and clean-up solvent used in the Resin Chop Spray Booth (EU-1A). The organic HAP content records may be based on MSDS, SDS or on resin specifications supplied by the resin supplier. The organic HAP content shall be determined in accordance with §63.5797.
2. The owner or operator shall maintain the following daily records on the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15):
    a. The identification of any VOC-containing and HAP-containing material used; and,
    b. The amount, in gallons or pounds, of each VOC-containing and HAP-containing material used. For the purpose of calculating material usage, all materials may be considered used on the day they are delivered to the plant or are removed from storage.

    [Authority for Requirement 2: DNR Construction Permit 25-A-065]
3. The owner or operator shall keep the following monthly records on the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15):

a. The identification of each VOC-containing and HAP-containing material used.
b. The amount, in gallons or pounds, of each VOC-containing and HAP-containing material used. For the purpose of calculating material usage, all materials may be considered used on the day they are delivered to the plant or are removed from storage.
c. The amount of VOC emissions, in tons.
d. The rolling 12-month total amount of VOC emissions, in tons.
e. The amount of total HAP emissions, in tons.
f. The rolling 12-month total amount of total HAP emissions, in tons.

The permittee shall maintain these monthly records by the 30th day following the end of the previous month.

4. If the 12-month rolling total amount of VOC emissions from the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) exceeds 96.0 tons, the permittee shall immediately begin keeping the following daily records on the emission units.
    a. The amount of VOC emissions (tons);
    b. The 365-day rolling total of the amount of VOC emissions (tons);

    Daily calculation for VOC emissions shall continue until the 365-day rolling total of the amount of VOC emissions from these emission units drops below 96.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculations of VOC emission will cease per Recordkeeping and Reporting Requirement 4 of this permit. If the emissions once again exceed 96.0 tons, daily recordkeeping will be required per Recordkeeping and Reporting Requirement 4 of this permit.
5. If the 12-month rolling total of total HAP emissions from the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10) and the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) exceeds 76.0 tons, the permittee shall keep the following daily records on the emission units:
    a. The amount of total HAP emissions (tons);
    b. The 365-day rolling total of the amount of total HAP emissions (tons);

    Daily calculation for total HAP emissions shall continue until the 365-day rolling total of the amount of total HAP emissions from these emission units drops below 76.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculations of total HAP emission will cease per Recordkeeping and Reporting Requirement 5 of this permit. If the emissions once again exceed 76.0 tons, daily recordkeeping will be required per Recordkeeping and Reporting Requirement 5 of this permit.
6. Emissions of VOC and total HAP from Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10) and the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) shall be determined in the following way:
    a. For the resin chop spray booths and resin application, VOC and total HAP emissions shall be determined by multiplying the amount of resin used (tons) by the appropriate emission factor from Table 1 to Subpart WWWW of Part 63 for nonatomized mechanical resin application (lbs/ton resin) and then dividing by 2,000. VOC and HAP emissions from any catalyst used shall be estimated by assuming 100% loss of any VOC and HAP in the catalyst.
    b. For the Gel Coat spray booths and gel coat application, VOC and total HAP emissions shall be determined by multiplying the amount of gel coat used (tons) by the appropriate emission factor from Table 1 to Subpart WWWW of Part 63 for either atomized spray gel coat application or nonatomized spray gel coat application (lbs/ton resin) and then dividing by 2,000. VOC and HAP

emissions from any catalyst used shall be estimated by assuming 100% loss of any VOC and HAP in the catalyst.

c. For the paint spray booths, VOC and total HAP emissions shall be determined by multiplying the amount of paint used (gallons) by the VOC and total HAP content of the paint (lbs/gal) then dividing by 2,000.

7. The permittee shall follow one of the methods from §63.5810, *Options for Meeting Standards*, in order to demonstrate compliance with the organic HAP limits from Table 3 to Subpart WWWW of Part 63. The permittee shall maintain a record of which compliance option from 40 CFR Part 63, Subpart WWWW is being used for the Resin Chop Spray Booth (EU-1A). At the time of permit issuance, the permittee is using §63.5810(c), *Weighted Average Emission Limit*. The necessary calculations must be completed within 30 days after the end of the month. The facility is allowed to change compliance options for Subpart WWWW; however, the permittee shall notify the Iowa DNR – Air Quality Bureau and DNR Field Office 5 in a compliance report if the compliance option has changed.
8. The permittee shall submit all notifications required by Table 13 of Subpart WWWW.
9. The permittee shall submit all reports required by Table 14 of Subpart WWWW.
10. The permittee shall retain records in accordance with §63.5915. Records required by Subpart WWWW must be retained for a minimum of five years.
11. The permittee shall properly install, operate and maintain equipment to periodically monitor the differential pressure drop across the dry filters. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan. The pressure drop shall be recorded weekly.
12. The permittee shall maintain records on the maintenance performed on the dry filters. The permittee shall maintain records on when the filters are changed.

Authority for Requirement: DNR Construction Permits 15-A-037-S1 & 15-A-038-S1
40 CFR Part 63 Subpart WWWW
567 IAC 23.1(4)"cw"

NESHAP

This facility is subject to the requirements of 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production (567 IAC 23.1(4)"cw"). The facility is a new affected source as defined in §63.5795. In accordance with §63.5935, the Resin Chop Spray Booth (EU-1A) meets the definition of an open molding process used to make reinforced plastic parts. The facility is also subject to the applicable requirements of the General Provisions (Subpart A) per Table 15 of Subpart WWWW.

Authority for Requirement: DNR Construction Permits 15-A-037-S1 & 15-A-038-S1
40 CFR Part 63 Subpart WWWW
567 IAC 23.1(4)"cw"

Emission Point Characteristics

Each emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 30
Stack Opening, (inches, dia.): 24
Exhaust Flow Rate (scfm): 7,000
Exhaust Temperature (°F): 100
Discharge Style: Vertical Unobstructed
Authority for Requirement: DNR Construction Permits 15-A-037-S1 & 15-A-038-S1

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

different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

Monitoring Requirements

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

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

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

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

Authority for Requirement: 567 IAC 24.108(3)

Emission Point ID Number: EP- 2A & EP-2B

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-2A	Flat Gel Coat/ Flat Chop Spray Booth #1	CE-2A: Dry Filters	Resin, Gel Coat, Fiberglass Chop, Catalyst	761 lbs/hr Resin 110 lbs/hr Gel Coat	15-A-039-S1, 15-A-040-S1

Applicable Requirements

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

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

Pollutant: Opacity
Emission Limit(s): 40%[(1)]
Authority for Requirement: DNR Construction Permits 15-A-039-S1 & 15-A-040-S1
567 IAC 23.3(2)"d"

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

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 0.20 lb/hr
Authority for Requirement: DNR Construction Permits 15-A-039-S1 & 15-A-040-S1

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.01 gr/dscf
Authority for Requirement: DNR Construction Permits 15-A-039-S1 & 15-A-040-S1
567 IAC 23.4(13)

Pollutant: Volatile Organic Compounds (VOC)
Emission Limit(s): 120.0 tons/yr[(2)]
Authority for Requirement: DNR Construction Permits 15-A-039-S1 & 15-A-040-S1

Pollutant: Total HAP
Emission Limit(s): 95.0 tons/yr[(2)(3)]
Authority for Requirement: DNR Construction Permits 15-A-039-S1 & 15-A-040-S1
40 CFR Part 63 Subpart WWWW
567 IAC 23.1(4)"cw"

[(2)] Limits apply to the following emissions units: Resin Chop Spray Booth (EU-1A), Flat Gel Coat/Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Manual Gel Coat Spray Application (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15). The Total HAP limit is established so that the facility is not subject to the requirements of §63.5805(d)(1).

[(3)] For resin application, the organic HAP limit from 40 CFR Part 63, Subpart WWWW, Table 3 is: 88 lbs per ton of resin (open molding – non-corrosion-resistant and/or high strength, mechanical resin application). For gel coat application the following limits for organic HAP apply: 440 lbs per ton of tooling gel coat, 267 lbs per ton of white/off white pigmented gel coat, 377 lbs per ton of pigmented gel coat, and 522 lbs per ton of clear production gel coat. (Subpart WWWW, Table 3)

Operational Limits & Reporting/Record keeping Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

Operating Limits

1. Resin shall be applied in the Flat Gel Coat/Flat Chop Spray Booth #1 (EU-2A) by using a spray gun that meets the definition of nonatomized mechanical resin application from §63.5935 of Part 63, Subpart WWWW. The spray gun must be operated according to the manufacturer's directions, including instructions to prevent the operation of the spray gun at excessive spray pressure. Examples of nonatomized application include flow coaters, pressure fed rollers and fluid impingement spray guns. This operating limit does not apply to application of gel coat.
2. A maximum of one spray gun shall be used in Flat Gel Coat/Flat Chop Spray Booth #1 (EU-2A) at any one time.
3. The dry filters (CE-2A) used in Flat Gel Coat/Flat Chop Spray Booth #1 (EU-2A) shall be operated and maintained in accordance with the recommendations of the manufacturer. A double filter system shall be used (i.e. two filters in series). The pressure drop across the dry filters shall be maintained within the range recommended by the manufacturer.
4. The clean-up solvent used in the Flat Gel Coat/Flat Chop Spray Booth #1 (EU-2A) shall not contain any VOC or HAP.
5. The facility must be in compliance at all times with all applicable work practice standards from Table 4 of Subpart WWWW. This includes:
    a. The permittee must keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
    b. Mixers used to blend or agitate HAP-containing materials in vessels larger than 5.0 gallons shall meet the following requirements:
        i. A cover shall be used on the mixer with no visible gaps, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;
        ii. The mixer vents shall be kept closed when actual mixing is occurring except that venting is allowed during the addition of materials or as necessary prior to adding materials or opening the cover for safety; and
        iii. The mixer covers shall be closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

Reporting and Recordkeeping

1. The permittee shall keep records on the identification, the HAP content, and the VOC content of each resin, gel coat, catalyst material, and clean-up solvent used in the Flat Gel Coat/Flat Chop Spray Booth #1 (EU-2A). The organic HAP content records may be based on MSDS, SDS or on resin specifications supplied by the resin supplier. The organic HAP content shall be determined in accordance with §63.5797.
2. The owner or operator shall maintain the following daily records on the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15).
    a. The identification of any VOC-containing and HAP-containing material used.
    b. The amount, in gallons or pounds, of each VOC-containing and HAP-containing material used. For the purpose of calculating material usage, all materials may be considered used on the day they are delivered to the plant or are removed from storage.

    [Authority for Requirement 2: DNR Construction Permit 25-A-065]
3. The permittee shall keep the following monthly records on the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A),

Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10) and the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15):

a. The identification of each VOC-containing and HAP-containing material used;
b. The amount, either in gallons or pounds, of each VOC-containing and HAP-containing material used;
c. The amount of VOC emissions (tons);
d. The 12-month rolling total of the amount of VOC emissions (tons);
e. The amount of total HAP emissions (tons);
f. The 12-month rolling total of the amount of total HAP emissions (tons).

The permittee shall maintain these monthly records by the 30th day following the end of the previous month.

4. If the 12-month rolling total of the VOC emissions from the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10) and the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) exceeds 96.0 tons, the permittee shall keep the following daily records on the emission units:
   a. The amount of VOC emissions (tons);
   b. The 365-day rolling total of the amount of VOC emissions (tons);

   Daily calculation for VOC emissions shall continue until the 365-day rolling total of the amount of VOC emissions from these emission units drops below 96.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculations of VOC emission will cease per Recordkeeping and Reporting Requirement 4 of this permit. If the emissions once again exceed 96.0 tons, daily recordkeeping will be required per Recordkeeping and Reporting Requirement 4 of this permit.
5. If the 12-month rolling total of total HAP emissions from the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10) and the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11) , Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) exceeds 76.0 tons, the permittee shall keep the following daily records on the emission units:
   a. The amount of total HAP emissions (tons);
   b. The 365-day rolling total of the amount of total HAP emissions (tons);

   Daily calculation for total HAP emissions shall continue until the 365-day rolling total of the amount of total HAP emissions from these emission units drops below 76.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculations of total HAP emission will cease per Recordkeeping and Reporting Requirement 5 of this permit. If the emissions once again exceed 76.0 tons, daily recordkeeping will be required per Recordkeeping and Reporting Requirement 5 of this permit.
6. Emissions of VOC and total HAP from Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10) and the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) shall be determined in the following way:
   a. For the resin chop spray booths and resin application, VOC and total HAP emissions shall be determined by multiplying the amount of resin used (tons) by the appropriate emission factor from Table 1 to Subpart WWWW of Part 63 for nonatomized mechanical resin application (lbs/ton resin) and then dividing by 2,000. VOC and HAP emissions from any catalyst used shall be estimated by assuming 100% loss of any VOC and HAP in the catalyst.
   b. For the Gel Coat spray booths and gel coat application, VOC and total HAP emissions shall be determined by multiplying the amount of gel coat used (tons) by the appropriate emission factor

from Table 1 to Subpart WWWW of Part 63 for either atomized spray gel coat application or nonatomized spray gel coat application (lbs/ton resin) and then dividing by 2,000. VOC and HAP emissions from any catalyst used shall be estimated by assuming 100% loss of any VOC and HAP in the catalyst.

c. For the paint spray booths, VOC and total HAP emissions shall be determined by multiplying the amount of paint used (gallons) by the VOC and total HAP content of the paint (lbs/gal) then dividing by 2,000.

7. The permittee shall follow one of the methods from §63.5810, *Options for Meeting Standards*, in order to demonstrate compliance with the organic HAP limits for resin and for the different types of gel coat (i.e. tooling, white and pigmented). The permittee shall maintain a record of which compliance option from 40 CFR Part 63, Subpart WWWW is being used for the Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A). At the time of permit issuance, the permittee is using §63.5810 (c), *Weighted Average Emission Limit*. The necessary calculations must be completed within 30 days after the end of the month. The facility is allowed to change compliance options; however, the permittee shall notify the Iowa DNR – Air Quality Bureau and DNR Field Office 5 in a compliance report if the compliance option has changed.
8. The permittee shall submit all notifications required by Table 13 of Subpart WWWW.
9. The permittee shall submit all reports required by Table 14 of Subpart WWWW.
10. The permittee shall retain records in accordance with §63.5915. Records required by Subpart WWWW must be retained for a minimum of five years.
11. The permittee shall properly install, operate and maintain equipment to periodically monitor the differential pressure drop across the dry filters. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan. The pressure drop shall be recorded weekly.
12. The permittee shall maintain records on the maintenance performed on the dry filters. The permittee shall maintain records on when the filters are changed.

Authority for Requirement: DNR Construction Permit 15-A-039-S1 & 15-A-040-S1
40 CFR Part 63 Subpart WWWW
567 IAC 23.1(4)"cw"

NESHAP

This facility is subject to the requirements of 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production (567 IAC 23.1(4)"cw"). The facility is a new affected source as defined in §63.5795. In accordance with §63.5935, the Flat Gel Coat/Flat Chop Spray Booth (EU-2A) meets the definition of an open molding process used to make reinforced plastic parts. The facility is also subject to the applicable requirements of the General Provisions (Subpart A) per Table 15 of Subpart WWWW.

Authority for Requirement: DNR Construction Permits 15-A-039-S1 & 15-A-040-S1
40 CFR Part 63 Subpart WWWW
567 IAC 23.1(4)"cw"

Emission Point Characteristics

Each emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 30
Stack Opening, (inches, dia.): 24
Exhaust Flow Rate (scfm): 7,000
Exhaust Temperature (°F): 100
Discharge Style: Vertical Unobstructed
Authority for Requirement: DNR Construction Permits 15-A-039-S1 & 15-A-040-S1

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

Monitoring Requirements

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

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

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

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

Authority for Requirement: 567 IAC 24.108(3)

Emission Point ID Number: EP-3A & EP-3B

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-3A	Gel Coat Spray Area	CE-3A: Dry Filters	Gel coat and Catalyst	110 lbs/hr Gel Coat	15-A-041-S1, 15-A-042-S1

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)
The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 40%(1)
Authority for Requirement: DNR Construction Permits 15-A-041-S1 & 15-A-042-S1
567 IAC 23.3(2)"d"

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

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 0.20 lb/hr
Authority for Requirement: DNR Construction Permits 15-A-041-S1 & 15-A-042-S1

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.01 gr/dscf
Authority for Requirement: DNR Construction Permits 15-A-041-S1 & 15-A-042-S1
567 IAC 23.4(13)

Pollutant: Volatile Organic Compound (VOC)
Emission Limit(s): 120.0 tons/yr(2)
Authority for Requirement: DNR Construction Permits 15-A-041-S1 & 15-A-042-S1

Pollutant: Total HAP
Emission Limit(s): 95.0 tons/yr(2)(3)
Authority for Requirement: DNR Construction Permits 15-A-041-S1 & 15-A-042-S1
40 CFR Part 63 Subpart WWWW
567 IAC 23.1(4)"cw"

(2) Limits apply to the following emissions units: Resin Chop Spray Booth (EU-1A), Flat Gel Coat/Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Manual Gel Coat Spray Application (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15). The Total HAP limit is established so that the facility is not subject to the requirements of §63.5805(d)(1).
(3) For gel coat application, the organic HAP limit from 40 CFR Part 63, Subpart WWWW, Table 3 is: 440 lbs per ton of tooling gel coat, 267 lbs per ton of white/off white pigmented gel coat, 377 lbs per ton of pigmented gel coat, and 522 lbs per ton of clear production gel coat.

Operational Limits & Reporting/Record keeping Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

Operating Limits

1. A maximum of one spray gun shall be used in the Gel Coat Spray Booth (EU-3A) at any one time.
2. The dry filters (CE-3A) used in the Gel Coat Spray Booth (EU-3A) shall be operated and maintained in accordance with the recommendations of the manufacturer. A double filter system shall be used (i.e. two filters in series). The pressure drop across the dry filters shall be maintained within the range recommended by the manufacturer.
3. The clean-up solvent used in the Gel Coat Spray Booth (EU-3A) shall not contain any VOC or HAP.
4. The facility must be in compliance at all times with all applicable work practice standards from Table 4 of subpart WWWW. This includes:
    a. The permittee must keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
    b. Mixers used to blend or agitate HAP-containing materials in vessels larger than 5.0 gallons shall meet the following requirements:
        i. A cover shall be used on the mixer with no visible gaps, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;
        ii. The mixer vents shall be kept closed when actual mixing is occurring except that venting is allowed during the addition of materials or as necessary prior to adding materials or opening the cover for safety; and
        iii. The mixer covers shall be closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

Reporting and Recordkeeping

1. The permittee shall keep records on the identification, the HAP content, and the VOC content of each gel coat, catalyst material, and clean-up solvent used in the Gel Coat Spray Booth (EU-3A). The organic HAP content records may be based on MSDS, SDS or on resin specifications supplied by the resin supplier. The organic HAP content shall be determined in accordance with §63.5797.
2. The owner or operator shall maintain the following daily records on the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15).
    a. The identification of any VOC-containing and HAP-containing material used.
    b. The amount, in gallons or pounds, of each VOC-containing and HAP-containing material used. For the purpose of calculating material usage, all materials may be considered used on the day they are delivered to the plant or are removed from storage.

    [Authority for Requirement 2: DNR Construction Permit 25-A-065]
3. The permittee shall keep the following monthly records on the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10) and the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11)), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15):
    a. The identification of each VOC-containing and HAP-containing material used;
    b. The amount, either in gallons or pounds, of each VOC-containing and HAP-containing material used;
    c. The amount of VOC emissions (tons);
    d. The 12-month rolling total of the amount of VOC emissions (tons);

e. The amount of total HAP emissions (tons);
f. The 12-month rolling total of the amount of total HAP emissions (tons).

The permittee shall maintain these monthly records by the 30th day following the end of the previous month.

4. If the 12-month rolling total of the VOC emissions from the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10) and the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11)), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) exceeds 96.0 tons, the permittee shall keep the following daily records on the emission units:
   a. The amount of VOC emissions (tons);
   b. The 365-day rolling total of the amount of VOC emissions (tons);

   Daily calculation for VOC emissions shall continue until the 365-day rolling total of the amount of VOC emissions from these emission units drops below 96.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculations of VOC emission will cease per Recordkeeping and Reporting Requirement 4 of this permit. If the emissions once again exceed 96.0 tons, daily recordkeeping will be required per Recordkeeping and Reporting Requirement 4 of this permit.
5. If the 12-month rolling total of total HAP emissions from the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10) and the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11)), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) exceeds 76.0 tons, the permittee shall keep the following daily records on the emission units:
   a. The amount of total HAP emissions (tons);
   b. The 365-day rolling total of the amount of total HAP emissions (tons);

   Daily calculation for total HAP emissions shall continue until the 365-day rolling total of the amount of total HAP emissions from these emission units drops below 76.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculations of total HAP emission will cease per Recordkeeping and Reporting Requirement 5 of this permit. If the emissions once again exceed 76.0 tons, daily recordkeeping will be required per Recordkeeping and Reporting Requirement 5 of this permit.
6. Emissions of VOC and total HAP from Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10) and the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11)), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) shall be determined in the following way:
   a. For the resin chop spray booths and resin application, VOC and total HAP emissions shall be determined by multiplying the amount of resin used (tons) by the appropriate emission factor from Table 1 to Subpart WWWW of Part 63 for nonatomized mechanical resin application (lbs/ton resin) and then dividing by 2,000. VOC and HAP emissions from any catalyst used shall be estimated by assuming 100% loss of any VOC and HAP in the catalyst.
   b. For the Gel Coat spray booths and gel coat application, VOC and total HAP emissions shall be determined by multiplying the amount of gel coat used (tons) by the appropriate emission factor from Table 1 to Subpart WWWW of Part 63 for either atomized spray gel coat application or nonatomized spray gel coat application (lbs/ton resin) and then dividing by 2,000. VOC and HAP emissions from any catalyst used shall be estimated by assuming 100% loss of any VOC and HAP in the catalyst.
   c. For the paint spray booths, VOC and total HAP emissions shall be determined by multiplying the amount of paint used (gallons) by the VOC and total HAP content of the paint (lbs/gal) then dividing by 2,000.
7. The permittee shall follow one of the methods from §63.5810, *Options for Meeting Standards*, in order to demonstrate compliance with organic HAP limits from Table 3 to Subpart WWWW of Part 63. The

permittee shall maintain a record of which compliance option from 40 CFR Part 63, Subpart WWWW is being used for the Gel Coat Spray Booth (EU-3A). At the time of permit issuance, the permittee is using §63.5810 (c), *Weighted Average Emission Limit*. The necessary calculations must be completed within 30 days after the end of the month. The facility is allowed to change compliance options; however, the permittee shall notify the Iowa DNR – Air Quality Bureau and DNR Field Office 5 in a compliance report if the compliance option has changed.

8. The permittee shall submit all notifications required by Table 13 of Subpart WWWW.
9. The permittee shall submit all reports required by Table 14 of Subpart WWWW.
10. The permittee shall retain records in accordance with §63.5915. Records required by Subpart WWWW must be retained for a minimum of five years.
11. The permittee shall properly install, operate and maintain equipment to periodically monitor the differential pressure drop across the dry filters. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan. The pressure drop shall be recorded weekly.
12. The permittee shall maintain records on the maintenance performed on the dry filters. The permittee shall maintain records on when the filters are changed.

Authority for Requirements: DNR Construction Permit 15-A-041-S1 & 15-A-042-S1
40 CFR Part 63 Subpart WWWW
567 IAC 23.1(4)"cw"

NESHAP

This facility is subject to the requirements of 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production (567 IAC 23.1(4)"cw"). The facility is a new affected source as defined in §63.5795. In accordance with §63.5935, the Gel Coat Spray Booth (EU-3A) meets the definition of an open molding process used to make reinforced plastic parts. The facility is also subject to the applicable requirements of the General Provisions (Subpart A) per Table 15 of Subpart WWWW.

Authority for Requirement: DNR Construction Permits 15-A-041-S1 & 15-A-042-S1
40 CFR Part 63 Subpart WWWW
567 IAC 23.1(4)"cw"

Emission Point Characteristics

Each emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 30
Stack Opening, (inches, dia.): 24
Exhaust Flow Rate (scfm): 7,000
Exhaust Temperature (°F): 100
Discharge Style: Vertical Unobstructed
Authority for Requirement: DNR Construction Permits 15-A-041-S1 & 15-A-042-S1

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

Monitoring Requirements

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

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

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

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

Authority for Requirement: 567 IAC 24.108(3)

Emission Point ID Number: EP-4A & EP-4B

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-4A	Paint Spray Booth #1	CE-4A: Dry Filters	Primer, Topcoat, Reducer, Thinner, and Hardener	2.68 gal/hr Primer 4.7 gal/hr Paint	15-A-043-S1, 15-A-044-S1

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)
The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 40%[(1)]
Authority for Requirement: DNR Construction Permits 15-A-043-S1 & 15-A-044-S1
567 IAC 23.3(2)"d"

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

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 0.20 lb/hr
Authority for Requirement: DNR Construction Permits 15-A-043-S1 & 15-A-044-S1

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.01 gr/dscf
Authority for Requirement: DNR Construction Permits 15-A-043-S1 & 15-A-044-S1
567 IAC 23.4(13)

Pollutant: Volatile Organic Compound (VOC)
Emission Limit(s): 120.0 tons/yr[(2)]
Authority for Requirement: DNR Construction Permits 15-A-043-S1 & 15-A-044-S1

Pollutant: Total HAP
Emission Limit(s): 95.0 tons/yr[(2)], 1.9 lb Organic HAP/gallon coating solids
Authority for Requirement: DNR Construction Permits 15-A-043-S1 & 15-A-044-S1
40 CFR Part 63 Subpart MMMM
567 IAC 23.1(4)"cm"

[(2)] Limits apply to the following emissions units: Resin Chop Spray Booth (EU-1A), Flat Gel Coat/Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Manual Gel Coat Spray Application (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15). The Total HAP limit is established so that the facility is not subject to the requirements of §63.5805(d)(1).

Operational Limits & Reporting/Record keeping Requirements
The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

Operating Limits
1. The clean-up solvent used in Paint Spray Booth #1 (EU-4A) shall not contain any VOC or HAP.

2. A maximum of one spray gun shall be used in Paint Spray Booth #1 (EU-4A) at any one time.
3. The dry filters (CE-4A) used in Paint Spray Booth #1 (EU-4A) shall be operated and maintained in accordance with the recommendations of the manufacturer. The pressure drop across the dry filters shall be maintained within the range recommended by the manufacturer.
4. In order to comply with the organic HAP limit from 40 CFR Part 63, Subpart MMMM, the permittee must follow either compliance option (a) (Compliant Material Option) or compliance option (b) (Emission Rate Without Add-on Controls Option) from §63.3891. The permittee is not required to meet any work practice standards in accordance with §63.3893(a).

Reporting and Recordkeeping

1. The permittee shall keep records on the identification, the organic HAP content, and the VOC content (pounds per gallon) of each coating material and solvent used in Paint Spray Booth #1 (EU-4A). A record of the mix ratio shall be maintained for each coating material, as applicable. The as-applied VOC content of each coating material sprayed shall be calculated and recorded. Records on the HAP content of material shall be in accordance with §63.3930(b).
2. The owner or operator shall maintain the following daily records on the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15).
    a. The identification of any VOC-containing and HAP-containing material used.
    b. The amount, in gallons or pounds, of each VOC-containing and HAP-containing material used. For the purpose of calculating material usage, all materials may be considered used on the day they are delivered to the plant or are removed from storage.

    [Authority for Requirement 2: DNR Construction Permit 25-A-065]
3. The permittee shall keep the following monthly records on the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10) and the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11)), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15):
    a. The identification of each VOC-containing and HAP-containing material used;
    b. The amount, either in gallons or pounds, of each VOC-containing and HAP-containing material used;
    c. The amount of VOC emissions (tons);
    d. The 12-month rolling total of the amount of VOC emissions (tons);
    e. The amount of total HAP emissions (tons);
    f. The 12-month rolling total of the amount of total HAP emissions (tons).

    The permittee shall maintain these monthly records by the 30th day following the end of the previous month.
4. If the 12-month rolling total of the VOC emissions from the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10) and the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11)), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15): exceeds 96.0 tons, the permittee shall keep the following daily records on the emission units:
    a. The amount of VOC emissions (tons);
    b. The 365-day rolling total of the amount of VOC emissions (tons);

    Daily calculation for VOC emissions shall continue until the 365-day rolling total of the amount of VOC emissions from these emission units drops below 96.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculations of VOC emission will cease per

Recordkeeping and Reporting Requirement 4 of this permit. If the emissions once again exceed 96.0 tons, daily recordkeeping will be required per Recordkeeping and Reporting Requirement 4 of this permit.

5. If the 12-month rolling total of total HAP emissions from the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10) and the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11)), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15): exceeds 76.0 tons, the permittee shall keep the following daily records on the emission units:
    a. The amount of total HAP emissions (tons);
    b. The 365-day rolling total of the amount of total HAP emissions (tons);

   Daily calculation for total HAP emissions shall continue until the 365-day rolling total of the amount of total HAP emissions from these emission units drops below 76.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculations of total HAP emission will cease per Recordkeeping and Reporting Requirement 5 of this permit. If the emissions once again exceed 76.0 tons, daily recordkeeping will be required per Recordkeeping and Reporting Requirement 5 of this permit.
6. Emissions of VOC and total HAP from Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10) and the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11)), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15): shall be determined in the following way:
    a. For the resin chop spray booths and resin application, VOC and total HAP emissions shall be determined by multiplying the amount of resin used (tons) by the appropriate emission factor from Table 1 to Subpart WWWW of Part 63 for nonatomized mechanical resin application (lbs/ton resin) and then dividing by 2,000. VOC and HAP emissions from any catalyst used shall be estimated by assuming 100% loss of any VOC and HAP in the catalyst.
    b. For the Gel Coat spray booths and gel coat application, VOC and total HAP emissions shall be determined by multiplying the amount of gel coat used (tons) by the appropriate emission factor from Table 1 to Subpart WWWW of Part 63 for either atomized spray gel coat application or nonatomized spray gel coat application (lbs/ton resin) and then dividing by 2,000. VOC and HAP emissions from any catalyst used shall be estimated by assuming 100% loss of any VOC and HAP in the catalyst.
    c. For the paint spray booths, VOC and total HAP emissions shall be determined by multiplying the amount of paint used (gallons) by the VOC and total HAP content of the paint (lbs/gal) then dividing by 2,000.
7. The permittee shall follow one of the methods from §63.3891 in order to demonstrate compliance with the organic HAP limit of 1.9 pounds organic HAPs per gallon coating solids. The two options for meeting the standards for organic HAP emissions are in §63.3891: (a) Compliant material option or (b) Emission rate without add-on controls option. The permittee shall maintain a record of which compliance option from 40 CFR Part 63, Subpart MMMM is being used for the Paint Spray Booth #1 (EU-4A). Any necessary calculations must be completed within 30 days after the end of the month. The facility is allowed to change compliance options; however, the permittee shall notify the Iowa DNR – Air Quality Bureau and DNR Field Office 5 in a compliance report if the compliance option has changed.
8. In accordance with 40 CFR Part 63, Subpart MMMM, the permittee shall:
    a. submit the applicable notifications in accordance with §63.3910;
    b. submit the applicable reports in accordance with §63.3920;[(1)]
    c. maintain the necessary records in accordance with §63.3930 and §63.3931; and
    d. comply with the requirements in §63.3940 to §63.3942 if using the Compliant material option or comply with the requirements in §63.3950 to §63.3952 if using the Emission rate without add-on controls option.

9. The permittee shall properly install, operate and maintain equipment to periodically monitor the differential pressure drop across the dry filters. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan. The pressure drop shall be recorded weekly.
10. The permittee shall maintain records on the maintenance performed on the dry filters. The permittee shall maintain records on when the filters are changed.

(1) If the compliance option is switched during a reporting period, the permittee must report the beginning and ending dates for each compliance option used.

Authority for Requirement: DNR Construction Permit 15-A-043-S1 & 15-A-044-S1
40 CFR Part 63 Subpart MMMM
567 IAC 23.1(4)"cm"

NESHAP

This facility is subject to the requirements of 40 CFR Part 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products (567 IAC 23.1(4)"cm"). In accordance with §63.3882, the facility meets the definition of a new affected source that is used for surface coating of miscellaneous metal parts and products. The operations regulated by this standard are listed in §63.3882(b). Paint Spray Booth #1 (EU-4A) is a coating operation and is subject to the requirements of the standard. The facility is also subject to the applicable requirements of the General Provisions (Subpart A) per Table 2 of Subpart MMMM.

Authority for Requirement: DNR Construction Permits 15-A-043-S1 & 15-A-044-S1
40 CFR Part 63 Subpart MMMM
567 IAC 23.1(4)"cm"

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 30
Stack Opening, (inches, dia.): 30
Exhaust Flow Rate (scfm): 7,000
Exhaust Temperature (°F): 100
Discharge Style: Vertical Unobstructed
Authority for Requirement: DNR Construction Permits 15-A-043-S1 & 15-A-044-S1

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

Monitoring Requirements

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

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

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

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

Authority for Requirement: 567 IAC 24.108(3)

Emission Point ID Number: EP-9

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-9A	Hand Lay-up resin application	CE-09: Dry Filters	Gel Coat, Catalyst	110 lbs/hr	15-A-046-S2
EU-9B	Manual gel coat spray application			600 lbs/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: Particulate Matter (PM)
Emission Limit(s): 0.01 gr/dscf
Authority for Requirement: DNR Construction Permit 15-A-046-S2
567 IAC 23.4(13)

Pollutant: Volatile Organic Compound (VOC)
Emission Limit(s): 120.0 tons/yr[(2)]
Authority for Requirement: DNR Construction Permit 15-A-046-S2

Pollutant: Total HAP
Emission Limit(s): 95.0 tons/yr[(1)(2)]
Authority for Requirement: DNR Construction Permit 15-A-046-S2
40 CFR 63 Subpart WWWW
567 IAC 23.1(4)"cw"

[(1)] Limits apply to the following emissions units: Resin Chop Spray Booth (EU-1A), Flat Gel Coat/Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Manual Gel Coat Spray Application (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15). The Total HAP limit is established so that the facility is not subject to the requirements of §63.5805(d)(1).
[(2)] The organic HAP limit from 40 CFR Part 63, Subpart WWWW, the emission limit is dependent on the operations performed in this emission unit.

Operational Limits & Reporting/Record keeping Requirements
The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

A. The owner or operator shall keep records on the identification, the HAP content, and the VOC content of each resin, catalyst material, and clean-up solvent used in the Hand Lay-up resin application (EU-9A) and in the Interior Gel Coat Booth (EU-9B). The organic HAP content records may be based on MSDS, SDS or on resin specifications supplied by the resin supplier. The organic HAP content shall be determined in accordance with §63.5797.
B. The owner or operator shall maintain the following daily records on the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15):

1. The identification of any VOC-containing and HAP-containing material used; and,
2. The amount, in gallons or pounds, of each VOC-containing and HAP-containing material used. For the purpose of calculating material usage, all materials may be considered used on the day they are delivered to the plant or are removed from storage.

C. The owner or operator shall keep the following monthly records on the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15):
   1. The identification of each VOC-containing and HAP-containing material used.
   2. The amount, in gallons or pounds, of each VOC-containing and HAP-containing material used. For the purpose of calculating material usage, all materials may be considered used on the day they are delivered to the plant or are removed from storage.
   3. The amount of VOC emissions, in tons.
   4. The rolling 12-month total amount of VOC emissions, in tons.
   5. The amount of total HAP emissions, in tons; and,
   6. The rolling 12-month total amount of total HAP emissions, in tons.

   The owner or operator shall maintain these monthly records by the 30th day following the end of the previous month.

D. If the 12-month rolling total amount of VOC emissions from the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) exceeds 96.0 tons, the owner or operator shall immediately begin keeping the following daily records on the emission units:
   1. The total amount of VOC emissions, in tons; and,
   2. The 365-day rolling total of the amount of VOC emissions from the emission units, in tons.

   Daily calculations of VOC emissions shall continue until the 365-day rolling total of the amount of VOC emissions from these emission units drop below 96.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculations of VOC emissions will cease. If the VOC emissions once again exceed 96.0 tons, daily recordkeeping will be required per Condition 5.D. of this permit.

E. If the 12-month rolling total amount of Total HAP emissions from the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) exceeds 76.0 tons, the owner or operator shall immediately begin keeping the following daily records on the emission units:
   1. The total amount of Total HAP emissions, in tons; and,
   2. The 365-day rolling total amount of Total HAP emissions, in tons.

   Daily calculations of Total HAP emissions shall continue until the 365-day rolling total amount of Total HAP emissions from these emission units drop below 76.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculations of Total HAP emissions will cease. If the Total HAP emissions once again exceed 76.0 tons, daily recordkeeping will be required per Condition 5.E. of this permit.

F. The facility must be in compliance at all times with all applicable work practice standards from Table 4 of Subpart WWWW. This includes:
   1. The owner or operator must keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
   2. Mixers used to blend or agitate HAP-containing materials in vessels larger than 5.0 gallons shall meet the following requirements:
      a. A cover shall be used on the mixer with no visible gaps, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;
      b. The mixer vents shall be kept closed when actual mixing is occurring except that venting is allowed during the addition of materials or as necessary prior to adding materials or opening the cover for safety; and,
      c. The mixer covers shall be closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

G. VOC and total HAP emissions from Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) shall be determined in the following way:
   1. For the resin chop spray booths and resin application, VOC and total HAP emissions shall be determined by multiplying the amount of resin used (tons) by the appropriate emission factor from Table 1 to Subpart WWWW of Part 63 for nonatomized mechanical resin application (lbs/ton resin) and then dividing by 2000. VOC and HAP emissions from any catalyst used shall be estimated by assuming 100% loss of any VOC and HAP in the catalyst.
   2. For the gel coat spray booths and gel coat application, VOC and total HAP emissions shall be determined by multiplying the amount of gel coat used (tons) by the appropriate emission factor from Table 1 to Subpart WWWW of Part 63 for either atomized spray gel coat application or nonatomized spray gel coat application (lbs/ton resin) and then dividing by 2000. VOC and HAP emissions from any catalyst used shall be estimated by assuming 100% loss of any VOC and HAP in the catalyst.
   3. For the paint spray booths, VOC and total HAP emissions shall be determined by multiplying the amount of paint used (gallons) by the VOC and total HAP content of the paint (lbs/gal) and then dividing by 2000.

H. The owner or operator shall follow one of the methods from §63.5810, *Options for Meeting Standards*, in order to demonstrate compliance with the organic HAP limits from Table 3 to Subpart WWWW of Part 63. The owner or operator shall maintain a record of which compliance option from 40 CFR Part 63, Subpart WWWW is being used for the Hand Lay-up resin application (EU-9A) and the Interior Gel Coat Booth (EU-9B). At the time of permit issuance, the owner or operator is using §63.5810(c), *Weighted Average Emission Limit*. The necessary calculations must be completed within 30 days after the end of the month. The facility is allowed to change compliance options for Subpart WWWW; however, the owner or operator shall notify the Iowa DNR – Air Quality Bureau and DNR Field Office 5 in a compliance report if the compliance option has changed.

I. The owner or operator shall submit all notifications required by Table 13 of Subpart WWWW.

J. The owner or operator shall submit all reports required by Table 14 of Subpart WWWW.

K. The owner or operator shall retain records in accordance with §63.5915. Records required by Subpart WWWW must be retained for a minimum of five years.

L. The owner or operator shall operate and maintain the Dry Filters (CE-9) according to the manufacturer specifications. The owner or operator shall maintain a log of all maintenance and inspection activities performed on the Dry Filters (CE-9). This log shall include, but is not necessarily limited to:
   1. The date and time any inspection and/or maintenance was performed on the Dry Filters (CE-9);
   2. Any issues identified during the inspection and the date each issue was resolved;

3. Any issues identified during the maintenance activities and the date each issue was resolved; And
4. Identification of the staff member performing the maintenance or inspection.

M. The owner or operator shall properly install, operate and maintain equipment to periodically monitor the differential pressure drop across the Dry Filters (CE-9). The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan. The pressure drop shall be recorded weekly.

Authority for Requirement: DNR Construction Permit 15-A-046-S2
40 CFR 63 Subpart WWWW
567 IAC 23.1(4)"cw"

NESHAP

This facility is subject to the requirements of 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production (567 IAC 23.1(4)"cw"). The facility is a new affected source as defined in §63.5795. In accordance with §63.5935, Hand Lay-up resin application (EU-9A) and the Interior Gel Coat Booth (EU-9B) meet the definition of an open molding process used to make reinforced plastic parts. The facility is also subject to the applicable requirements of the General Provisions (Subpart A) per Table 15 of Subpart WWWW.

Authority for Requirement: DNR Construction Permit 15-A-046-S2
40 CFR Part 63 Subpart WWWW
567 IAC 23.1(4)"cw"

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 27
Stack Opening, (inches, dia.): 30
Exhaust Flow Rate (scfm): 4,000
Exhaust Temperature (°F): 70
Discharge Style: Vertical Unobstructed
Authority for Requirement: DNR Construction Permit 15-A-046-S2

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

Monitoring Requirements

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

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

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

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

Authority for Requirement: 567 IAC 24.108(3)

Emission Point ID Number: EP-10A & EP-10B

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-10	Mold Shop	CE-10: Dry Filters	Resin, Gel Coat, Fiberglass Chop, Catalyst	761 lbs/hr Resin, 110 lbs/hr Gel Coat	15-A-059-S1, 15-A-060-S1

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)
The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 40%[(1)]
Authority for Requirement: DNR Construction Permits 15-A-059-S1 & 15-A-060-S1
567 IAC 23.3(2)"d"

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

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 0.20 lb/hr
Authority for Requirement: DNR Construction Permits 15-A-059-S1 & 15-A-060-S1

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.01 gr/dscf
Authority for Requirement: DNR Construction Permits 15-A-059-S1 & 15-A-060-S1
567 IAC 23.4(13)

Pollutant: Volatile Organic Compound (VOC)
Emission Limit(s): 120.0 tons/yr[(2)]
Authority for Requirement: DNR Construction Permits 15-A-059-S1 & 15-A-060-S1

Pollutant: Total HAP
Emission Limit(s): 95.0 tons/yr[(2)(3)]
Authority for Requirement: DNR Construction Permits 15-A-059-S1 & 15-A-060-S1
40 CFR Part 63 Subpart WWWW
567 IAC 23.1(4)"cw"

[(2)] Limits apply to the following emissions units: Resin Chop Spray Booth (EU-1A), Flat Gel Coat/Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Manual Gel Coat Spray Application (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15). The Total HAP limit is established so that the facility is not subject to the requirements of §63.5805(d)(1).

[(3)] For resin application, the organic HAP limit from 40 CFR Part 63, Subpart WWWW, Table 3 is: 88 lbs per ton of resin (open molding – non-corrosion-resistant and/or high strength, mechanical resin application) and 254 lbs per ton of tooling resin. For gel coat application the following limits for organic HAP apply: 440 lbs per ton of tooling gel coat, 267 lbs per ton of white/off white pigmented gel coat, 377 lbs per ton of pigmented gel coat, and 522 lbs per ton of clear production gel coat (Subpart WWWW, Table 3)

Operational Limits & Reporting/Record keeping Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

Operating Limits:

1. Resin shall be applied in the Mold Shop (EU-10) by using a spray gun that meets the definition of nonatomized mechanical resin application from §63.5935 of Part 63, Subpart WWWW. The spray gun must be operated according to the manufacturer's directions, including instructions to prevent the operation of the spray gun at excessive spray pressure. Examples of nonatomized application include flow coaters, pressure fed rollers and fluid impingement spray guns. This operating limit does not apply to application of gel coat.
2. A maximum of one spray gun shall be used in the Mold Shop (EU-10) at any one time.
3. The dry filters (CE-10) used in the Mold Shop (EU-10) shall be operated and maintained in accordance with the recommendations of the manufacturer. A double filter system shall be used (i.e. two filters in series). The pressure drop across the dry filters shall be maintained within the range recommended by the manufacturer.
4. The clean-up solvent used in the Mold Shop (EU-10) shall not contain any VOC or HAP.
5. The facility must be in compliance at all times with all applicable work practice standards from Table 4 of subpart WWWW. This includes:
    a. The permittee must keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
    b. Mixers used to blend or agitate HAP-containing materials in vessels larger than 5.0 gallons shall meet the following requirements:
        i. A cover shall be used on the mixer with no visible gaps, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;
        ii. The mixer vents shall be kept closed when actual mixing is occurring except that venting is allowed during the addition of materials or as necessary prior to adding materials or opening the cover for safety; and
        iii. The mixer covers shall be closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

Reporting & Record keeping:

1. The permittee shall keep records on the identification, the HAP content, and the VOC content of each resin, gel coat, catalyst material, and clean-up solvent used in the Mold Shop (EU-10). The organic HAP content records may be based on MSDS, SDS or on resin specifications supplied by the resin supplier. The organic HAP content shall be determined in accordance with §63.5797.
2. The owner or operator shall maintain the following daily records on the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15).
    a. The identification of any VOC-containing and HAP-containing material used.
    b. The amount, in gallons or pounds, of each VOC-containing and HAP-containing material used. For the purpose of calculating material usage, all materials may be considered used on the day they are delivered to the plant or are removed from storage.

    [Authority for Requirement 2: DNR Construction Permit 25-A-065]
3. The permittee shall keep the following monthly records on the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10) and the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15):

a. The identification of each VOC-containing and HAP-containing material used;
b. The amount, either in gallons or pounds, of each VOC-containing and HAP-containing material used;
c. The amount of VOC emissions (tons);
d. The 12-month rolling total of the amount of VOC emissions (tons);
e. The amount of total HAP emissions (tons);
f. The 12-month rolling total of the amount of total HAP emissions (tons).

The permittee shall maintain these monthly records by the 30th day following the end of the previous month.

4. If the 12-month rolling total of the VOC emissions from the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10) and the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) exceeds 96.0 tons, the permittee shall keep the following daily records on the emission units:
    a. The amount of VOC emissions (tons);
    b. The 365-day rolling total of the amount of VOC emissions (tons);

    Daily calculation for VOC emissions shall continue until the 365-day rolling total of the amount of VOC emissions from these emission units drops below 96.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculations of VOC emission will cease per Recordkeeping and Reporting Requirement 4 of this permit. If the emissions once again exceed 96.0 tons, daily recordkeeping will be required per Recordkeeping and Reporting Requirement 4 of this permit.
5. If the 12-month rolling total of total HAP emissions from the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10) and the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) exceeds 76.0 tons, the permittee shall keep the following daily records on the emission units:
    a. The amount of total HAP emissions (tons);
    b. The 365-day rolling total of the amount of total HAP emissions (tons);

    Daily calculation for total HAP emissions shall continue until the 365-day rolling total of the amount of total HAP emissions from these emission units drops below 76.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculations of total HAP emission will cease per Recordkeeping and Reporting Requirement 5 of this permit. If the emissions once again exceed 76.0 tons, daily recordkeeping will be required per Recordkeeping and Reporting Requirement 5 of this permit.
6. Emissions of VOC and total HAP from Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) and the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11) shall be determined in the following way:
    a. For the resin chop spray booths and resin application, VOC and total HAP emissions shall be determined by multiplying the amount of resin used (tons) by the appropriate emission factor from Table 1 to Subpart WWWW of Part 63 for nonatomized mechanical resin application (lbs/ton resin) and then dividing by 2,000. VOC and HAP emissions from any catalyst used shall be estimated by assuming 100% loss of any VOC and HAP in the catalyst.
    b. For the Gel Coat spray booths and gel coat application, VOC and total HAP emissions shall be determined by multiplying the amount of gel coat used (tons) by the appropriate emission factor from Table 1 to Subpart WWWW of Part 63 for either atomized spray gel coat application or nonatomized spray gel coat application (lbs/ton resin) and then dividing by 2,000. VOC and HAP

emissions from any catalyst used shall be estimated by assuming 100% loss of any VOC and HAP in the catalyst.

c. For the paint spray booths, VOC and total HAP emissions shall be determined by multiplying the amount of paint used (gallons) by the VOC and total HAP content of the paint (lbs/gal) then dividing by 2,000.

7. The permittee shall follow one of the methods from §63.5810, Options for Meeting Standards, in order to demonstrate compliance with the organic HAP limits for resin and for the different types of gel coat (i.e. tooling, white and pigmented). The permittee shall maintain a record of which compliance option from 40 CFR Part 63, Subpart WWWW is being used for the Mold Shop (EU-10). At the time of permit issuance, the permittee is using §63.5810 (c), Weighted Average Emission Limit. The necessary calculations must be completed within 30 days after the end of the month. The facility is allowed to change compliance options; however, the permittee shall notify the Iowa DNR – Air Quality Bureau and DNR Field Office 5 in a compliance report if the compliance option has changed.
8. The permittee shall submit all notifications required by Table 13 of Subpart WWWW.
9. The permittee shall submit all reports required by Table 14 of Subpart WWWW.
10. The permittee shall retain records in accordance with §63.5915. Records required by Subpart WWWW must be retained for a minimum of five years.
11. The permittee shall maintain records on the maintenance performed on the dry filters. The permittee shall maintain records on when the filters are changed.

Authority for Requirement: DNR Construction Permits 15-A-059-S1 & 15-A-060-S1
40 CFR Part 63 Subpart WWWW
567 IAC 23.1(4)"cw"

NESHAP

This facility is subject to the requirements of 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production (567 IAC 23.1(4)"cw"). The facility is a new affected source as defined in §63.5795. In accordance with §63.5935, the Mold Shop (EU-10) meets the definition of an open molding process used to make reinforced plastic parts. The facility is also subject to the applicable requirements of the General Provisions (Subpart A) per Table 15 of Subpart WWWW.

Authority for Requirement: DNR Construction Permits 15-A-059-S1 & 15-A-060-S1
40 CFR Part 63 Subpart WWWW
567 IAC 23.1(4)"cw"

Emission Point Characteristics

Each emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 30
Stack Opening, (inches, dia.): 24
Exhaust Flow Rate scfm): 7,000
Exhaust Temperature (°F): 70
Discharge Style: Vertical Unobstructed
Authority for Requirement: DNR Construction Permits 15-A-059-S1 & 15-A-060-S1

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

Monitoring Requirements

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

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

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

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

Authority for Requirement: 567 IAC 24.108(3)

Emission Point ID Number: EP-11A & EP-11B

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-11	Flat Gel Coat/ Flat Chop Spray Booth #2	CE-11: Dry Filters	Resin, Gel Coat, Fiberglass Chop, Catalyst	761 lbs/hr Resin, 110 lbs/hr Gel Coat	15-A-061-S1, 15-A-062-S1

Applicable Requirements

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

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

Pollutant: Opacity
Emission Limit(s): 40%(1)
Authority for Requirement: DNR Construction Permits 15-A-061-S1 & 15-A-062-S1
567 IAC 23.3(2)"d"

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

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 0.20 lb/hr
Authority for Requirement: DNR Construction Permits 15-A-061-S1 & 15-A-062-S1

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.01 gr/dscf
Authority for Requirement: DNR Construction Permits 15-A-061-S1 & 15-A-062-S1
567 IAC 23.4(13)

Pollutant: Volatile Organic Compound (VOC)
Emission Limit(s): 120.0 tons/yr(2)
Authority for Requirement: DNR Construction Permits 15-A-061-S1 & 15-A-062-S1

Pollutant: Total HAP
Emission Limit(s): 95.0 tons/yr(2)(3)
Authority for Requirement: DNR Construction Permits 15-A-061-S1 & 15-A-062-S1
40 CFR Part 63 Subpart WWWW
567 IAC 23.1(4)"cw"

(2) Limits apply to the following emissions units: Resin Chop Spray Booth (EU-1A), Flat Gel Coat/Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Manual Gel Coat Spray Application (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15). The Total HAP limit is established so that the facility is not subject to the requirements of §63.5805(d)(1).

(3) For resin application, the organic HAP limit from 40 CFR Part 63, Subpart WWWW, Table 3 is: 88 lbs per ton of resin (open molding – non-corrosion-resistant and/or high strength, mechanical resin application). For gel coat application the following limits for organic HAP apply: 440 lbs per ton of tooling gel coat, 267 lbs per ton of white/off white pigmented gel coat, 377 lbs per ton of pigmented gel coat, and 522 lbs per ton of clear production gel coat. (Subpart WWWW, Table 3)

Operational Limits & Reporting/Record keeping Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

Operating Limits:

1. Resin shall be applied in the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11) by using a spray gun that meets the definition of nonatomized mechanical resin application from §63.5935 of Part 63, Subpart WWWW. The spray gun must be operated according to the manufacturer's directions, including instructions to prevent the operation of the spray gun at excessive spray pressure. Examples of nonatomized application include flow coaters, pressure fed rollers and fluid impingement spray guns. This operating limit does not apply to application of gel coat.
2. A maximum of one spray gun shall be used in Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11) at any one time.
3. The dry filters (CE-11) used in Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11) shall be operated and maintained in accordance with the recommendations of the manufacturer. A double filter system shall be used (i.e. two filters in series). The pressure drop across the dry filters shall be maintained within the range recommended by the manufacturer.
4. The clean-up solvent used in the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11) shall not contain any VOC or HAP.
5. The facility must be in compliance at all times with all applicable work practice standards from Table 4 of Subpart WWWW. This includes:
    a. The permittee must keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
    b. Mixers used to blend or agitate HAP-containing materials in vessels larger than 5.0 gallons shall meet the following requirements:
        i. A cover shall be used on the mixer with no visible gaps, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;
        ii. The mixer vents shall be kept closed when actual mixing is occurring except that venting is allowed during the addition of materials or as necessary prior to adding materials or opening the cover for safety; and
        iii. The mixer covers shall be closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

Reporting & Record keeping:

1. The permittee shall keep records on the identification, the HAP content, and the VOC content of each resin, gel coat, catalyst material, and clean-up solvent used in the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11). The organic HAP content records may be based on MSDS, SDS or on resin specifications supplied by the resin supplier. The organic HAP content shall be determined in accordance with §63.5797.
2. The owner or operator shall maintain the following daily records on the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15).
    a. The identification of any VOC-containing and HAP-containing material used.
    b. The amount, in gallons or pounds, of each VOC-containing and HAP-containing material used. For the purpose of calculating material usage, all materials may be considered used on the day they are delivered to the plant or are removed from storage.

    [Authority for Requirement 2: DNR Construction Permit 25-A-065]
3. The permittee shall keep the following monthly records on the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A),

Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10) and the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15):

a. The identification of each VOC-containing and HAP-containing material used;
b. The amount, either in gallons or pounds, of each VOC-containing and HAP-containing material used;
c. The amount of VOC emissions (tons);
d. The 12-month rolling total of the amount of VOC emissions (tons);
e. The amount of total HAP emissions (tons);
f. The 12-month rolling total of the amount of total HAP emissions (tons).

The permittee shall maintain these monthly records by the 30th day following the end of the previous month.

4. If the 12-month rolling total of the VOC emissions from the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10) and the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) exceeds 96.0 tons, the permittee shall keep the following daily records on the emission units:
    a. The amount of VOC emissions (tons);
    b. The 365-day rolling total of the amount of VOC emissions (tons);

    Daily calculation for VOC emissions shall continue until the 365-day rolling total of the amount of VOC emissions from these emission units drops below 96.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculations of VOC emission will cease per Recordkeeping and Reporting Requirement 4 of this permit. If the emissions once again exceed 96.0 tons, daily recordkeeping will be required per Recordkeeping and Reporting Requirement 4 of this permit.
5. If the 12-month rolling total of total HAP emissions from the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10) and the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) exceeds 76.0 tons, the permittee shall keep the following daily records on the emission units:
    a. The amount of total HAP emissions (tons);
    b. The 365-day rolling total of the amount of total HAP emissions (tons);

    Daily calculation for total HAP emissions shall continue until the 365-day rolling total of the amount of total HAP emissions from these emission units drops below 76.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculations of total HAP emission will cease per Recordkeeping and Reporting Requirement 5 of this permit. If the emissions once again exceed 76.0 tons, daily recordkeeping will be required per Recordkeeping and Reporting Requirement 5 of this permit.
6. Emissions of VOC and total HAP from Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10) and the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) shall be determined in the following way:
    a. For the resin chop spray booths and resin application, VOC and total HAP emissions shall be determined by multiplying the amount of resin used (tons) by the appropriate emission factor from Table 1 to Subpart WWWW of Part 63 for nonatomized mechanical resin application (lbs/ton resin) and then dividing by 2,000. VOC and HAP emissions from any catalyst used shall be estimated by assuming 100% loss of any VOC and HAP in the catalyst.
    b. For the Gel Coat spray booths and gel coat application, VOC and total HAP emissions shall be determined by multiplying the amount of gel coat used (tons) by the appropriate emission factor

from Table 1 to Subpart WWWW of Part 63 for either atomized spray gel coat application or nonatomized spray gel coat application (lbs/ton resin) and then dividing by 2,000. VOC and HAP emissions from any catalyst used shall be estimated by assuming 100% loss of any VOC and HAP in the catalyst.

c. For the paint spray booths, VOC and total HAP emissions shall be determined by multiplying the amount of paint used (gallons) by the VOC and total HAP content of the paint (lbs/gal) then dividing by 2,000.

7. The permittee shall follow one of the methods from §63.5810, Options for Meeting Standards, in order to demonstrate compliance with the organic HAP limits for resin and for the different types of gel coat (i.e. tooling, white and pigmented). The permittee shall maintain a record of which compliance option from 40 CFR Part 63, Subpart WWWW is being used for the Flat Gel Coat/ Flat Chop Spray Booth #2 (EU-11). At the time of permit issuance, the permittee is using §63.5810 (c), Weighted Average Emission Limit. The necessary calculations must be completed within 30 days after the end of the month. The facility is allowed to change compliance options; however, the permittee shall notify the Iowa DNR – Air Quality Bureau and DNR Field Office 5 in a compliance report if the compliance option has changed.
8. The permittee shall submit all notifications required by Table 13 of Subpart WWWW.
9. The permittee shall submit all reports required by Table 14 of Subpart WWWW.
10. The permittee shall retain records in accordance with §63.5915. Records required by Subpart WWWW must be retained for a minimum of five years.
11. The permittee shall properly install, operate and maintain equipment to periodically monitor the differential pressure drop across the dry filters. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan. The pressure drop shall be recorded weekly.
12. The permittee shall maintain records on the maintenance performed on the dry filters. The permittee shall maintain records on when the filters are changed.

Authority for Requirement: DNR Construction Permits 15-A-061-S1 & 15-A-062-S1
40 CFR Part 63 Subpart WWWW
567 IAC 23.1(4)"cw"

NESHAP

This facility is subject to the requirements of 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production (567 IAC 23.1(4)"cw"). The facility is a new affected source as defined in §63.5795. In accordance with §63.5935, the Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11) meets the definition of an open molding process used to make reinforced plastic parts. The facility is also subject to the applicable requirements of the General Provisions (Subpart A) per Table 15 of Subpart WWWW.

Authority for Requirement: DNR Construction Permits 15-A-061-S1 & 15-A-062-S1
40 CFR Part 63 Subpart WWWW
567 IAC 23.1(4)"cw"

Emission Point Characteristics

Each emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 30
Stack Opening, (inches, dia.): 30
Exhaust Flow Rate (scfm): 7,000
Exhaust Temperature (°F): 100
Discharge Style: Vertical Unobstructed
Authority for Requirement: DNR Construction Permits 15-A-061-S1 & 15-A-062-S1

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

Monitoring Requirements

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

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

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

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

Authority for Requirement: 567 IAC 24.108(3)

Emission Point ID Number: EP-13

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material	Rated Capacity	Construction Permit
EU-13	Spray Touch-up & Repair	Gelcoat, Catalyst	15.2 ounces/minute	23-A-176-S1

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)
The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 40%[(1)]
Authority for Requirement: DNR Construction Permits 23-A-176-S1
567 IAC 23.3(2)"d"

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

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.01 gr/dscf
Authority for Requirement: DNR Construction Permits 23-A-176-S1
567 IAC 23.4(13)

Pollutant: Volatile Organic Compound (VOC)
Emission Limit(s): 120.0 tons/yr[(2)]
Authority for Requirement: DNR Construction Permits 23-A-176-S1

Pollutant: Total HAP
Emission Limit(s): 95.0 tons/yr[(2]
Authority for Requirement: DNR Construction Permits 23-A-176-S1
40 CFR Part 63 Subpart WWWW
567 IAC 23.1(4)"cw"

[(2)] Limits apply to the following emissions units: Resin Chop Spray Booth (EU-1A), Flat Gel Coat/Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Manual Gel Coat Spray Application (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15). The Total HAP limit is established so that the facility is not subject to the requirements of §63.5805(d)(1).

Operational Limits & Reporting/Record keeping Requirements
The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

A. The owner or operator shall keep records on the identification, the HAP content, and the VOC content of each resin, catalyst material, and clean-up solvent used in the Spray Touch-up and Repair Operations (EU-13). The organic HAP content records may be based on MSDS, SDS or on resin specifications supplied by the resin supplier. The organic HAP content shall be determined in accordance with §63.5797.
B. The owner or operator shall maintain the following daily records on the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray

Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15):

1. The identification of any VOC-containing and HAP-containing material used; and,
2. The amount, in gallons or pounds, of each VOC-containing and HAP-containing material used. For the purpose of calculating material usage, all materials may be considered used on the day they are delivered to the plant or are removed from storage.

C. The owner or operator shall keep the following monthly records on the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15):

1. The identification of each VOC-containing and HAP-containing material used.
2. The amount, in gallons or pounds, of each VOC-containing and HAP-containing material used. For the purpose of calculating material usage, all materials may be considered used on the day they are delivered to the plant or are removed from storage.
3. The amount of VOC emissions, in tons.
4. The rolling 12-month total amount of VOC emissions, in tons.
5. The amount of total HAP emissions, in tons; and,
6. The rolling 12-month total amount of total HAP emissions, in tons.

The owner or operator shall maintain these monthly records by the 30th day following the end of the previous month.

D. If the 12-month rolling total amount of VOC emissions from the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) exceeds 96.0 tons, the owner or operator shall immediately begin keeping the following daily records on the emission units:

1. The total amount of VOC emissions, in tons; and,
2. The 365-day rolling total of the amount of VOC emissions from the emission units, in tons.

Daily calculations of VOC emissions shall continue until the 365-day rolling total of the amount of VOC emissions from these emission units drop below 96.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculations of VOC emissions will cease. If the VOC emissions once again exceed 96.0 tons, daily recordkeeping will be required per Condition D. of this permit.

E. If the 12-month rolling total amount of Total HAP emissions from the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) exceeds 76.0 tons, the owner or operator shall immediately begin keeping the following daily records on the emission units:

1. The total amount of Total HAP emissions, in tons; and,
2. The 365-day rolling total amount of Total HAP emissions, in tons.

Daily calculations of Total HAP emissions shall continue until the 365-day rolling total amount of Total HAP emissions from these emission units drop below 76.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculations of Total HAP

emissions will cease. If the Total HAP emissions once again exceed 76.0 tons, daily recordkeeping will be required per Condition E. of this permit.

F. The facility must be in compliance at all times with all applicable work practice standards from Table 4 of Subpart WWWW. This includes:
   1. The owner or operator must keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
   2. Mixers used to blend or agitate HAP-containing materials in vessels larger than 5.0 gallons shall meet the following requirements:
      a. A cover shall be used on the mixer with no visible gaps, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;
      b. The mixer vents shall be kept closed when actual mixing is occurring except that venting is allowed during the addition of materials or as necessary prior to adding materials or opening the cover for safety; and,
      c. The mixer covers shall be closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

G. VOC and total HAP emissions from Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) shall be determined in the following way:
   1. For the resin chop spray booths and resin application, VOC and total HAP emissions shall be determined by multiplying the amount of resin used (tons) by the appropriate emission factor from Table 1 to Subpart WWWW of Part 63 for nonatomized mechanical resin application (lbs/ton resin) and then dividing by 2000. VOC and HAP emissions from any catalyst used shall be estimated by assuming 100% loss of any VOC and HAP in the catalyst.
   2. For the gel coat spray booths and gel coat application, VOC and total HAP emissions shall be determined by multiplying the amount of gel coat used (tons) by the appropriate emission factor from Table 1 to Subpart WWWW of Part 63 for either atomized spray gel coat application or nonatomized spray gel coat application (lbs/ton resin) and then dividing by 2000. VOC and HAP emissions from any catalyst used shall be estimated by assuming 100% loss of any VOC and HAP in the catalyst.
   3. For the paint spray booths, VOC and total HAP emissions shall be determined by multiplying the amount of paint used (gallons) by the VOC and total HAP content of the paint (lbs/gal) and then dividing by 2000.

H. The owner or operator shall follow one of the methods from §63.5810, *Options for Meeting Standards*, in order to demonstrate compliance with the organic HAP limits from Table 3 to Subpart WWWW of Part 63. The owner or operator shall maintain a record of which compliance option from 40 CFR Part 63, Subpart WWWW is being used for the Spray Touch-up and Repair Operations (EU-13). At the time of permit issuance, the owner or operator is using §63.5810(c), *Weighted Average Emission Limit*. The necessary calculations must be completed within 30 days after the end of the month. The facility is allowed to change compliance options for Subpart WWWW; however, the owner or operator shall notify the Iowa DNR – Air Quality Bureau and DNR Field Office 5 in a compliance report if the compliance option has changed.

I. The owner or operator shall submit all notifications required by Table 13 of Subpart WWWW.

J. The owner or operator shall submit all reports required by Table 14 of Subpart WWWW.

K. The owner or operator shall retain records in accordance with §63.5915. Records required by Subpart WWWW must be retained for a minimum of five years.

Authority for Requirement: DNR Construction Permit 23-A-176-S1

Emission Point Characteristics
The emission point shall conform to the specifications listed below.

Stack Opening, (inches, dia.): Vents Inside
Exhaust Temperature (°F): Building Ambient
Authority for Requirement: DNR Construction Permit 23-A-176-S1

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

Monitoring Requirements

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 24.108(3)

Emission Point ID Number: EP-14

Associated Equipment

Emission Unit	Emission Unit Description	Raw Material	Rated Capacity	Construction Permit
EU-14	Hand Lay-up Operations	Gelcoat, Catalyst	NA	23-A-177-S1

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: Volatile Organic Compound (VOC)
Emission Limit(s): 120.0 tons/yr[(2)]
Authority for Requirement: DNR Construction Permits 23-A-177-S1

Pollutant: Total HAP
Emission Limit(s): 95.0 tons/yr[(1)]
Authority for Requirement: DNR Construction Permits 23-A-177-S1
40 CFR Part 63 Subpart WWWW
567 IAC 23.1(4)"cw"

[(1)] Limits apply to the following emissions units: Resin Chop Spray Booth (EU-1A), Flat Gel Coat/Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Manual Gel Coat Spray Application (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15). The Total HAP limit is established so that the facility is not subject to the requirements of §63.5805(d)(1).

Operational Limits & Reporting/Record keeping Requirements
The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

A. The owner or operator shall keep records on the identification, the HAP content, and the VOC content of each resin, catalyst material, and clean-up solvent used in the Hand Lay-up Operations (EU-14). The organic HAP content records may be based on MSDS, SDS or on resin specifications supplied by the resin supplier. The organic HAP content shall be determined in accordance with §63.5797.
B. The owner or operator shall maintain the following daily records on the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15):
    1. The identification of any VOC-containing and HAP-containing material used; and,
    2. The amount, in gallons or pounds, of each VOC-containing and HAP-containing material used. For the purpose of calculating material usage, all materials may be considered used on the day they are delivered to the plant or are removed from storage.
C. The owner or operator shall keep the following monthly records on the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15):
    1. The identification of each VOC-containing and HAP-containing material used.

2. The amount, in gallons or pounds, of each VOC-containing and HAP-containing material used. For the purpose of calculating material usage, all materials may be considered used on the day they are delivered to the plant or are removed from storage.
3. The amount of VOC emissions, in tons.
4. The rolling 12-month total amount of VOC emissions, in tons.
5. The amount of total HAP emissions, in tons; and,
6. The rolling 12-month total amount of total HAP emissions, in tons.

The owner or operator shall maintain these monthly records by the 30th day following the end of the previous month.

D. If the 12-month rolling total amount of VOC emissions from the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) exceeds 96.0 tons, the owner or operator shall immediately begin keeping the following daily records on the emission units:
   1. The total amount of VOC emissions, in tons; and,
   2. The 365-day rolling total of the amount of VOC emissions from the emission units, in tons.

   Daily calculations of VOC emissions shall continue until the 365-day rolling total of the amount of VOC emissions from these emission units drop below 96.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculations of VOC emissions will cease. If the VOC emissions once again exceed 96.0 tons, daily recordkeeping will be required per Condition D. of this permit.

E. If the 12-month rolling total amount of Total HAP emissions from the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) exceeds 76.0 tons, the owner or operator shall immediately begin keeping the following daily records on the emission units:
   1. The total amount of Total HAP emissions, in tons; and,
   2. The 365-day rolling total amount of Total HAP emissions, in tons.

   Daily calculations of Total HAP emissions shall continue until the 365-day rolling total amount of Total HAP emissions from these emission units drop below 76.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculations of Total HAP emissions will cease. If the Total HAP emissions once again exceed 76.0 tons, daily recordkeeping will be required per Condition E. of this permit.

F. The facility must be in compliance at all times with all applicable work practice standards from Table 4 of Subpart WWWW. This includes:
   1. The owner or operator must keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
   2. Mixers used to blend or agitate HAP-containing materials in vessels larger than 5.0 gallons shall meet the following requirements:
      a. A cover shall be used on the mixer with no visible gaps, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;
      b. The mixer vents shall be kept closed when actual mixing is occurring except that venting is

allowed during the addition of materials or as necessary prior to adding materials or opening the cover for safety; and,

c. The mixer covers shall be closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

G. VOC and total HAP emissions from Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) shall be determined in the following way:

1. For the resin chop spray booths and resin application, VOC and total HAP emissions shall be determined by multiplying the amount of resin used (tons) by the appropriate emission factor from Table 1 to Subpart WWWW of Part 63 for nonatomized mechanical resin application (lbs/ton resin) and then dividing by 2,000. VOC and HAP emissions from any catalyst used shall be estimated by assuming 100% loss of any VOC and HAP in the catalyst.
2. For the gel coat spray booths and gel coat application, VOC and total HAP emissions shall be determined by multiplying the amount of gel coat used (tons) by the appropriate emission factor from Table 1 to Subpart WWWW of Part 63 for either atomized spray gel coat application or nonatomized spray gel coat application (lbs/ton resin) and then dividing by 2000. VOC and HAP emissions from any catalyst used shall be estimated by assuming 100% loss of any VOC and HAP in the catalyst.
3. For the paint spray booths, VOC and total HAP emissions shall be determined by multiplying the amount of paint used (gallons) by the VOC and total HAP content of the paint (lbs/gal) and then dividing by 2,000.

H. The owner or operator shall follow one of the methods from §63.5810, *Options for Meeting Standards*, in order to demonstrate compliance with the organic HAP limits from Table 3 to Subpart WWWW of Part 63. The owner or operator shall maintain a record of which compliance option from 40 CFR Part 63, Subpart WWWW is being used for the Hand Lay-up Operations (EU-14). At the time of permit issuance, the owner or operator is using §63.5810(c), *Weighted Average Emission Limit*. The necessary calculations must be completed within 30 days after the end of the month. The facility is allowed to change compliance options for Subpart WWWW; however, the owner or operator shall notify the Iowa DNR – Air Quality Bureau and DNR Field Office 5 in a compliance report if the compliance option has changed.

I. The owner or operator shall submit all notifications required by Table 13 of Subpart WWWW.

J. The owner or operator shall submit all reports required by Table 14 of Subpart WWWW.

K. The owner or operator shall retain records in accordance with §63.5915. Records required by Subpart WWWW must be retained for a minimum of five years.

Authority for Requirement: DNR Construction Permit 23-A-177-S1

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Opening, (inches, dia.): Vents Inside
Exhaust Temperature (°F): Building Ambient
Authority for Requirement: DNR Construction Permit 23-A-177-S1

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

Monitoring Requirements

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

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

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

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

Authority for Requirement: 567 IAC 24.108(3)

Emission Point ID Number: EP-15

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-15	Paint Spray Booth #2	CE-15A: Pre-Filter, CE-15B: Pocket Filter	Paint, Solvent, Primer	1 Spray Gun at 4.2 gal/hr	25-A-065

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)
The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 40%
Authority for Requirement: DNR Construction Permit 25-A-065

Pollutant: Particulate Matter ($PM_{2.5}$)
Emission Limit(s): 0.17 lb/hr
Authority for Requirement: DNR Construction Permit 25-A-065

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 0.17 lb/hr
Authority for Requirement: DNR Construction Permit 25-A-065

Pollutant: Particulate Matter (PM)
Emission Limit(s): 0.17 lb/hr, 0.01 gr/scf
Authority for Requirement: DNR Construction Permit 25-A-065
567 IAC 23.4(13)

Pollutant: Volatile Organic Compound (VOC)
Emission Limit(s): 120.0 tons/yr[(2)]
Authority for Requirement: DNR Construction Permits 25-A-065

Pollutant: Total HAP
Emission Limit(s): 95.0 tons/yr[(1)(2)]
Authority for Requirement: DNR Construction Permits 25-A-065
40 CFR Part 63 Subpart MMMM
567 IAC 23.1(4)"cm"

[(1)] Limits apply to the following emissions units: Resin Chop Spray Booth (EU-1A), Flat Gel Coat/Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth (EU-4A), Hand Lay-up resin application (EU-9A), Manual Gel Coat Spray Application (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15). The Total HAP limit is established so that the facility is not subject to the requirements of §63.5805(d)(1).
[(2)] The limit from 40 CFR Part 63, Subpart MMMM is 1.9 pounds organic HAPs per gallon coating solids used during each 12-month compliance period.

Operational Limits & Reporting/Record keeping Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

1. The clean-up solvent used in Paint Spray Booth #2 (EU-15) shall not contain any VOC or HAP.
2. The owner or operator shall keep records on the identification, the HAP content, and the VOC content of each coating material and clean-up solvent used in Paint Spray Booth #2 (EU-15). The organic HAP content records may be based on the Safety Data Sheets (SDS). The organic HAP content shall be determined in accordance with 40 CFR §63.3930(b).
3. The owner or operator shall maintain the following daily records on the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15).
   c. The identification of any VOC-containing and HAP-containing material used.
   d. The amount, in gallons or pounds, of each VOC-containing and HAP-containing material used. For the purpose of calculating material usage, all materials may be considered used on the day they are delivered to the plant or are removed from storage.
4. The owner or operator shall keep the following monthly records on the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15):
   a. The identification of each VOC-containing and HAP-containing material used.
   b. The amount, in gallons or pounds, of each VOC-containing and HAP-containing material used. For the purpose of calculating material usage, all materials may be considered used on the day they are delivered to the plant or are removed from storage.
   c. The amount of VOC emissions, in tons.
   d. The rolling 12-month total amount of VOC emissions, in tons.
   e. The amount of total HAP emissions, in tons.
   f. The rolling 12-month total amount of total HAP emissions, in tons.
   The owner or operator shall maintain these monthly records by the 30th day following the end of the previous month.
5. If the 12-month rolling total amount of VOC emissions from the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) exceeds 96.0 tons, the permittee shall immediately begin keeping the following daily records on the emission units.
   a. The total amount of VOC emissions, in tons.
   b. The 365-day rolling total of the amount of VOC emissions from the emission units, in tons.

Daily calculations for VOC emissions shall continue until the 365-day rolling total of the amount of VOC emissions from these emission units drops below 96.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculation of VOC emissions will cease per Condition 5 of this permit. If the VOC emissions once again exceed 96.0 tons, daily recordkeeping will be required per Condition 5 of this permit.

6. If the 12-month rolling total amount of Total HAP emissions from the Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold

Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) exceeds 76.0 tons, the permittee shall immediately begin keeping the following daily records on the emission units.

a. The amount of emissions of Total HAP, in tons.
b. The 365-day rolling total of the amount of emissions of Total HAP, in tons.

Daily calculations of Total HAP emissions shall continue until the 365-day rolling total of the amount of emissions of each Total HAP from these emission units drops below 76.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculation of emissions of each Total HAP will cease per Condition 6 of this permit. If the emissions once again exceed 96.0 tons, daily recordkeeping will be required per Condition 6 of this permit.

7. In order to comply with the organic HAP limit from 40 CFR Part 63, Subpart MMMM, the permittee must follow either compliance option (a) (Compliant Material Option) or compliance option (b) (Emission Rate Without Add-on Controls Option) from §63.3891. The permittee is not required to meet any work practice standards in accordance with §63.3893(a). The permittee shall follow one of the methods from §63.3891 in order to demonstrate compliance with the organic HAP limit of 1.9 pounds organic HAPs per gallon coating solids. The two options for meeting the standards for organic HAP emissions are in §63.3891: (a) Compliant material option or (b) Emission rate without add-on controls option. The permittee shall maintain a record of which compliance option from 40 CFR Part 63, Subpart MMMM is being used for the Paint Spray Booth #2 (EU-15). Any necessary calculations must be completed within 30 days after the end of the month. The facility is allowed to change compliance options; however, the permittee shall notify the Iowa DNR – Air Quality Bureau and DNR Field Office 5 in a compliance report if the compliance option has changed.
8. In accordance with 40 CFR Part 63, Subpart MMMM, the permittee shall:
   a. submit the applicable notifications in accordance with §63.3910;
   b. submit the applicable reports in accordance with §63.3920;
   c. maintain the necessary records in accordance with §63.3930 and §63.3931; and
   d. comply with the requirements in §63.3940 to §63.3942 if using the Compliant material option or comply with the requirements in §63.3950 to §63.3952 if using the Emission rate without add-on controls option.

   If the compliance option is switched during a reporting period, the permittee must report the beginning and ending dates for each compliance option used.
9. Emissions of VOC and total HAP from Resin Chop Spray Booth (EU-1A), Flat Gel Coat/ Flat Chop Spray Booth #1 (EU-2A), Gel Coat Spray Booth (EU-3A), Paint Spray Booth #1 (EU-4A), Hand Lay-up resin application (EU-9A), Interior Gel Coat Booth (EU-9B), Mold Shop (EU-10), Flat Gel Coat/Flat Chop Spray Booth #2 (EU-11), Spray Touch-up & Repair (EU-13), Hand Lay-up Operations (EU-14), and Paint Spray Booth #2 (EU-15) shall be determined in the following way:
   a. For the resin chop spray booths and resin application, VOC and total HAP emissions shall be determined by multiplying the amount of resin used (tons) by the appropriate emission factor from Table 1 to Subpart WWWW of Part 63 for nonatomized mechanical resin application (lbs/ton resin) and then dividing by 2,000. VOC and HAP emissions from any catalyst used shall be estimated by assuming 100% loss of any VOC and HAP in the catalyst.
   b. For the Gel Coat spray booths and gel coat application, VOC and total HAP emissions shall be determined by multiplying the amount of gel coat used (tons) by the appropriate emission factor from Table 1 to Subpart WWWW of Part 63 for either atomized spray gel coat application or nonatomized spray gel coat application (lbs/ton resin) and then dividing by 2,000. VOC and HAP emissions from any catalyst used shall be estimated by assuming 100% loss of any VOC and HAP in the catalyst.
   c. For the paint spray booths, VOC and total HAP emissions shall be determined by multiplying the amount of paint used (gallons) by the VOC and total HAP content of the paint (lbs/gal) then dividing

by 2,000.

10. The owner or operator shall operate and maintain the Pre-Filter (CE-15A) and Pocket Filter (CE-15B) according to the manufacturer specifications. The owner or operator shall maintain a log of all maintenance and inspection activities performed on the Pre-Filter (CE-15A) and Pocket Filter (CE-15B). This log shall include, but is not necessarily limited to:
    a. The date and time any inspection and/or maintenance was performed on the Pre-Filter (CE-15A) and Pocket Filter (CE-15B));
    b. Any issues identified during the inspection and the date each issue was resolved;
    c. Any issues identified during the maintenance activities and the date each issue was resolved; And
    d. Identification of the staff member performing the maintenance or inspection.
11. The owner or operator shall only use 1 spray gun at one time in Paint Spray Booth #2 (EU-15).

Authority for Requirement: DNR Construction Permit 25-A-065
40 CFR Part 63 Subpart MMMM
567 IAC 23.1(4)"cm"

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft., from the ground): 35.3
Stack Opening, (inches, dia.): 28
Exhaust Flow Rate (scfm): 17,500
Exhaust Temperature (°F): Ambient
Discharge Style: Vertical, Unobstructed
Authority for Requirement: DNR Construction Permit 25-A-065

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

Monitoring Requirements

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

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

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

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

Authority for Requirement: 567 IAC 24.108(3)

Emission Point ID Number: EP-16

Associated Equipment

Emission Unit	Emission Unit Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EU-16	North Building Welders	CE-16: Cartridge Filter	Welding Wire	35 welders; 131.6 lb welding wire per hour	25-A-066-S1
	South Building Welders	NA		25 welders; 94.0 lb welding wire per hour	

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)
The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity
Emission Limit(s): 40%
Authority for Requirement: DNR Construction Permit 25-A-066-S1
567 IAC 23.3(2)"d"
An exceedance of the indicator opacity of 'No Visible Emissions' will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter ($PM_{2.5}$)
Emission Limit(s): 3.42 lb/hr
Authority for Requirement: DNR Construction Permit 25-A-066-S1

Pollutant: Particulate Matter (PM_{10})
Emission Limit(s): 3.42 lb/hr
Authority for Requirement: DNR Construction Permit 25-A-066-S1

Pollutant: Particulate Matter (PM)
Emission Limit(s): 3.42 lb/hr, 0.1 gr/scf
Authority for Requirement: DNR Construction Permit 25-A-066-S1
567 IAC 23.3(2)"a"(1)

Operational Limits & Reporting/Record keeping Requirements
The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.

A. The owner or operator shall purchase a maximum of 52,000 pounds of welding electrode at this facility (Plant Number: 53-02-009) in any rolling 12-month period. On a monthly basis, the owner or operator shall:
    1. Record the total amount of welding electrode, in pounds, purchased at this facility during the previous month; and
    2. Calculate and record the total amount of welding electrode, in pounds, purchased at this facility during the previous rolling 12-month period.
B. The welding electrode types used at this facility (Plant Number: 53-02-009) shall be limited to a maximum emission factor of 24.1 pounds of PM emissions per thousand pounds of electrode consumed ($lb/10^3$ lb), as specified in Table 12.19-1 of EPA's *AP-42: Compilation of Air Emission Factors*. The

owner or operator shall maintain documentation that specifies each type of electrode used at this facility and the corresponding AP-42 PM emission factor.

C. The owner or operator shall operate and maintain the Cartridge Filters (CE-16) according to the manufacturer specifications. The owner or operator shall maintain a log of all maintenance and inspection activities performed on the Cartridge Filters (CE-16). This log shall include, but is not necessarily limited to:
    1. The date and time any inspection and/or maintenance was performed on the Cartridge Filters (CE-16);
    2. Any issues identified during the inspection and the date each issue was resolved;
    3. Any issues identified during the maintenance activities and the date each issue was resolved; And
    4. Identification of the staff member performing the maintenance or inspection.

Authority for Requirement: DNR Construction Permit 25-A-066-S1

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Opening, (inches, dia.): Vents Inside
Exhaust Temperature (°F): Building Ambient
Authority for Requirement: DNR Construction Permit 25-A-066-S1

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

Monitoring Requirements

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

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

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

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

Authority for Requirement: 567 IAC 24.108(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 24.

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 24.108(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 24.105(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 24.108(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 24.108(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 24.108(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 24.108(15)"c"*

G2. Permit Expiration

1. Except as provided in rule 567—24.104(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—24.105(455B). *567 IAC 24.116(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. 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 24.105(2). *567 IAC 24.105*

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 24.107(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 24.108(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 24.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. *567 IAC 24.108 (5)*

G6. Annual Fees

1. The permittee is required under subrule 567 IAC 30.4(2) to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. 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.

    a. 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.

    b. The emissions inventory shall be submitted annually by March 31 with forms specified by the department documenting actual emissions for the previous calendar year.

    c. The fee shall be submitted annually by July 1 with forms specified by the department.

    d. 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.

    e. 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.

    f. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 24.115(1)"d".

2. The permittee is required under subrule 567 IAC 30.4(3) to pay an annual base fee based on the fee schedule approved by the commission and posted on the department’s website. Beginning July 1, 2026, Title V operating base fees will be paid on July 1 of each year.

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 24.108 (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 24.108 (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 21.8(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 24.108(4), 567 IAC 24.108(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 24;
    b. Compliance test methods specified in 567 Chapter 21; 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 24.108(6)*

G13. Hazardous Release

Any permittee manufacturing, storing, handling, transporting, or disposing of a hazardous substance shall report a hazardous condition to the department at (515) 725-8694 and either the local police department or the office

of the sheriff of the county where the hazardous condition occurred. The initial report shall be made as soon as possible but not later than six hours after the onset or discovery of the hazardous condition. This initial report must be followed up with a written report as indicated in 567 IAC 105.5(2). *567 IAC Chapter 105-State Only*

G14. Excess Emissions and Excess Emissions Reporting Requirements

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control measures. Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. A variance from this subrule may be available as provided for in Iowa Code section 455B.143. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

2. Excess Emissions Reporting

a. Initial Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 21.10(6). An initial report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 21.10(1)) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable emission standard by more than 10 percent or the applicable visible emission standard by more than 10 percent opacity. The initial report may be made by electronic mail (E-mail), in person, or by telephone and shall include as a minimum the following:

i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.

ii. The estimated quantity of the excess emission.

iii. The time and expected duration of the excess emission.

iv. The cause of the excess emission.

v. The steps being taken to remedy the excess emission.

vi. The steps being taken to limit the excess emission in the interim period.

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

i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.

ii. The estimated quantity of the excess emission.

iii. The time and duration of the excess emission.

iv. The cause of the excess emission.

v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess

emission.

vi. The steps that were taken to limit the excess emission.

vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. *567 IAC 21.7(1)-567 IAC 21.7(4)*

3. Emergency Defense for Excess Emissions. For the purposes of this permit, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:

a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;

b. The facility at the time was being properly operated;

c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and

d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice fulfills the requirement of paragraph 24.108(5)"b." – See G15. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or upset provision contained in any applicable requirement. *567 IAC 24.108(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 24.108(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 24.

b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);

c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);

d. The changes are not subject to any requirement under Title IV of the Act (revisions affecting Title IV

permitting are addressed in rules 567—24.140(455B) through 567 - 24.144(455B));.

e. The changes comply with all applicable requirements.

f. For each such change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:

i. A brief description of the change within the permitted facility,

ii. The date on which the change will occur,

iii. Any change in emission as a result of that change,

iv. The pollutants emitted subject to the emissions trade

v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.

vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and

vii. Any permit term or condition no longer applicable as a result of the change.

567 IAC 24.110(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 24.110(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 24.110(1). *567 IAC 24.110(3)*

4. The permit shield provided in subrule 24.108(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 24.110(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 24.108(11)*

G18. Duty to Modify a Title V Permit

1. Administrative Amendment.

a. An administrative permit amendment is a permit revision that does any of the following:

i. Correct typographical errors

ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source;

iii. Require more frequent monitoring or reporting by the permittee; or

iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.

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

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

2. Minor Title V Permit Modification.

a. Minor Title V permit modification procedures may be used only for those permit modifications that satisfy all of the following:

i. Do not violate any applicable requirement;

ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping

requirements in the Title V permit;

iii. Do not require or change a case by case determination of an emission limitation or other standard, or an increment analysis;

iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act;

v. Are not modifications under any provision of Title I of the Act; and

vi. Are not required to be processed as significant modification under rule 567 - 24.113(455B).

b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:

i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;

ii. The permittee's suggested draft permit;

iii. Certification by a responsible official, pursuant to 567 IAC 24.107(4), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and

iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 24.107(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 24.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against the facility.

3. Significant Title V Permit Modification.

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 24, including those for applications, public participation, review by affected states, and review by the administrator, as those requirements that apply to Title V issuance and renewal.

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 24.111-567 IAC 24.113*

G19. Duty to Obtain Construction Permits

Unless exempted in 567 IAC 22.1(2) or to meet the parameters established in 567 IAC 22.1(1)"c", the permittee shall not construct, install, reconstruct or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, or conditional permit, or permit pursuant to rule 567 IAC 22.8, or permits required pursuant to rules 567 IAC 22.4, 567 IAC 22.5, 567 IAC 31.3, and 567 IAC 33.3 as required in 567 IAC 22.1(1). A permit shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source or anaerobic lagoon. *567 IAC 22.1(1)*

G20. Asbestos

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

G21. Open Burning

The permittee is prohibited from conducting open burning, except as provided in 567 IAC 23.2. *567 IAC 23.2 except 23.2(3)"j"; 567 IAC 23.2(3)"j" - State Only*

G22. Acid Rain (Title IV) Emissions Allowances

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 24.108(7)*

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

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
    a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.
    b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
    c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
    d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.
2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
    a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
    b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
    c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
    d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)
    e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
    f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.
3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not

include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,

5. The permittee shall be allowed to switch from any ozone-depleting or greenhouse gas generating substances to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *40 CFR part 82*

G24. Permit Reopenings

1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. *567 IAC 24.108(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 24.108(17)"a", 567 IAC 24.108(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 24.114*

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 24.114*

5. A notice of intent shall be provided to the Title V source at least 30 days in advance of the date the permit is to be reopened, except that the director may provide a shorter time period in the case of an emergency. *567 IAC 24.114*

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 24.108 (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 24.108 (8)*

G27. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. *567 IAC 24.108 (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 consistent with the requirements of 567 IAC 24.111(1). *567 IAC 24.111 (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. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. If the owner or operator does not provide timely notice to the department, the department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with applicable rules or permit conditions. Upon written request, the department may allow a notification period of less than 30 days. At the department’s request, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. A testing protocol shall be submitted to the department no later than 15 days before the owner or operator conducts the compliance demonstration. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks (42 days) 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
6200 Park Ave
Suite 200
Des Moines, IA 50321
(515) 343-6589

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 21.10(7)"a", 567 IAC 21.10(9)

G31. Prevention of Air Pollution Emergency Episodes

The permittee shall comply with the provisions of 567 IAC Chapter 21 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 21.14*

G32. Contacts List

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

Iowa Compliance Officer
Air Branch
Enforcement and Compliance Assurance Division
U.S. EPA Region 7
11201 Renner Blvd.
Lenexa, KS 66219
(913) 551-7020

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
6200 Park Ave
Suite 200
Des Moines, IA 50321
(515) 313-8325

Reports or notifications to the DNR Field Offices shall be directed to the supervisor at the appropriate field office or local program. The current address and phone number is:

Field Office 5
6200 Park Ave
Suite 200
Des Moines, IA 50321
(515) 725-0268

V. Appendix A: NESHAP

- 40 CFR 63 Subpart A – General Provisions
  https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-A

- 40 CFR 63 Subpart MMMM—National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products
  https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-MMMM

- 40 CFR 63 Subpart WWWW—National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production
  https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-WWWW

Iowa Department of Natural Resources
Draft Title V Operating Permit Fact Sheet

This document has been prepared to fulfill the public participation requirements of 40 CFR Part 70 and 567 Iowa Administrative Code (IAC) 24.107(6). 40 CFR Part 70 contains operating permit regulations pursuant to Title V of the Clean Air Act.

The Iowa Department of Natural Resources (DNR) finds that:

1. Altec Industries, Inc., located at 1001 Furnas Drive, Osceola, Iowa 50213 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Tyler Sheeley.
2. Altec Industries, Inc. is a lightweight fiberglass composite truck bodies and related products manufacturer. This facility consists of 12 emission units with potential emissions of:

Pollutant	**Abbreviation**	**Potential Emissions** (Tons per Year)
Particulate Matter (≤ 2.5 μm)	$PM_{2.5}$	13.40
Particulate Matter (≤ 10 μm)	PM_{10}	13.40
Particulate Matter	PM	22.16
Sulfur Dioxide	SO_2	0.00
Nitrogen Oxides	NO_x	0.00
Volatile Organic Compounds	VOC	120.00
Carbon Monoxide	CO	0.00
Lead	Lead	0.00
Hazardous Air Pollutants [(1)]	HAP	95.00

[(1)] May include the following: Arsenic, Benzene, Beryllium, Cadmium, Chromium, Cobalt, Dimethyl Phthalate, Ethylbenzene, Formaldehyde, Hexane, Manganese, Mercury, Naphthalene, Nickel, Styrene, Toluene, and Xylenes.

3. Altec Industries, Inc. submitted a Title V Operating Permit renewal application on 2/27/2026. Based on the information provided in these documents, DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 24.107.
4. DNR has complied with the procedures set forth in 567 IAC 24.107, including those regarding public notice, opportunity for public hearing, and notification of EPA and surrounding state and local air pollution programs.

DNR procedures for reaching a final decision on the draft permit:

1. The public comment period for the draft permit will run from 11/19/2026 through 12/19/2026. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Derek Wedemeier at the DNR address shown below. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period.
2. Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to Derek Wedemeier at the DNR address shown below.

Derek Wedemeier
IOWA DEPARTMENT OF NATURAL RESOURCES - AIR QUALITY BUREAU
6200 PARK AVE STE 200
DES MOINES IA 50321
Phone: (515) 725-9520
E-mail: Derek.Wedemeier@dnr.iowa.gov

3. DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the renewal application. The responsiveness summary and the final permit will be available to the public upon request.

DNR concludes that:

1. DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 21-33, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.
2. DNR has the authority to issue operating permits for air contaminant sources and to include conditions in such permits under 455B.134 Code of Iowa.
3. The emission limits included in this permit are authorized by 455B.133 Code of Iowa and 567 IAC Chapters 21-33.
4. DNR is required to comply with 567 IAC Chapter 24 in conjunction with issuing a Title V Operating Permit.
5. The issuance of this permit does not preclude the DNR from pursuing enforcement action for any violation.

Title V Application Review Notes R3

Applicant:	**Altec Industries, Inc.**
SIC Code:	**3713**
City:	Osceola
County:	Clarke, Field Office 5
EIQ#:	92-4329
Facility#:	20-01-018
Permit Number	09-TV-003R3
Reviewer:	Derek Wedemeier
Date:	**DATE**

Facility Identification

Facility Name:	**Altec Industries, Inc**
Facility Location:	1001 Furnas Drive, Osceola, Iowa 50213
Responsible Official:	Mr. Tyler Sheeley
Phone:	641-223-8766

Background

The Part 70 Title V Operating Permit for Altec Industries, Inc. The facility is lightweight fiberglass composite truck bodies and related products manufacturer. The Altec Industries, Inc has 12 significant emission units and 44 insignificant emission units.

Regulatory Status:

Title V Major Source Status by Pollutant is shown in the following table:

Pollutant	**Major for Title V?**
PM_{10}	☐
SO_2	☐
NO_x	☐
VOC	☒
CO	☐
Lead	☐
Individual HAP	☒
Total HAPs	☒

Construction Permits:

The description of emission units and their updated construction permits are listed below.

Emission Point Number	**Emission Unit Number**	**Emission Unit Description**	**Construction Permit Number**
EP-1A	EU-1A	Resin Chop Spray Booth	15-A-037-S1
EP-1B			15-A-038-S1
EP-2A	EU-2A	Flat Gel Coat/Flat Chop Spray Booth	15-A-039-S1
EP-2B			15-A-040-S1
EP-3A	EU-3A	Gel Coat Spray Booth	15-A-041-S1
EP-3B			15-A-042-S1
EP-4A	EU-4A	Paint Spray Booth #1	15-A-043-S1
EP-4B			15-A-044-S1
EP-9	EU-9A	Body Shop	15-A-046-S2
	EU-9B	Interior Gel Coat Booth	

Emission Point Number	Emission Unit Number	Emission Unit Description	Construction Permit Number
EP-10A	EU-10	Mold Shop	15-A-059-S1
EP-10B			15-A-060-S1
EP-11A	EU-11	Flat Gel Coat/Flat Chop Spray Booth #2	15-A-061-S1
EP-11B			15-A-062-S1
EP-13	EU-13	Spray Touch-Up and Repair	23-A-176-S1
EP-14	EU-14	Hand Lay-up	23-A-177-S1
EP-15	EU-15	Paint Spray Booth #2	25-A-065
EP-16	EU-16	Welding	25-A-066-S1

Program Applicability:

- ✓ PSD: No
- ✓ Part 61 NESHAP: No
- ✓ NSPS: No
- ✓ Part 63 NESHAP: Yes
    1. 40 CFR 63 Subpart MMMM
    2. 40 CFR 63 Subpart WWWW
- ✓ Acid Rain: No
- ✓ Stratospheric Ozone Protection: No
- ✓ Prevention of Accidental Releases: No
- ✓ CAM: No

Emission Estimates:

Potential and actual emissions are listed below.

Potential Emissions:

PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	Lead	Total HAPs	Single HAP*
Potential Emissions									
22.16	13.40	13.40	0.00	0.00	120.00	0.00	0.00	95.00	92.00
Actual Emissions 2025									
0.00	0.00	0.00	0.00	0.00	46.15	0.00	0.00	30.24	28.21

*Includes Styrene

General Conditions

General Changes:

- Permit number has been updated to 09-TV-003R3
- Updated Supervisor of Air Operating Permits Section to Corey McCoid.
- Updated Equipment List and Insignificant Activities equipment list (pp. 5)
- Removed all remaining language referencing EP-8
- General Conditions were updated.
- Changed general permit formatting

Altec submitted a supplemental modification during the renewal process to incorporate changes from construction project 26-205 issued on 10/6/2026.

Periodic Monitoring and Stack Testing:

Periodic Monitoring requirements were evaluated on the Department's Periodic Monitoring Guidance. An Agency O&M plan is typically required for all surface coating operations controlled by fabric filters. However,

no additional monitoring is required because the operating conditions listed in the corresponding construction permits meet the requirements of an Agency O&M plan. Additionally, periodic monitoring guidance would not support the recommendation of an Agency O&M plan based on pre-control potential emission totals. There is no stack testing required by construction permits or this Title V permit at this time. CAM does not apply to these units because precontrol emissions do not exceed the major source threshold for any emission unit.

Emission Point – Specific Conditions

All emission points excluding EP-16 are subject to the facility-wide limits for VOC, 120tpy, and Total HAP, 95.0 tpy.

The facility requested a change to the condition requiring daily record keeping of VOC and HAP containing materials. They request stated the facility's actual annual emissions are significantly less than the facility wide thresholds that require 365-day rolling total records and that daily requirement has become cumbersome. Construction permits for EP-13, EP-14, and EP-15 require daily recordkeeping and specifically require daily recordkeeping for all units, EP-1 through EP-15. These construction permits supersede the requirements listed in the permits for EP-1 through EP-11 since these are the most recently issued construction permits. This change cannot be made within the Title V permit without the modification of the construction permits.

Condition 5.C of 25-A-065 referencing daily recordkeeping has been added to EP-1 through EP-11.

Condition 6.C of EP-1A/B, 2A/B, 3A/B, 4A/B, 10A/B, 11A/B and 9.c. of EP-15 have been updated to references "the paint spray booths" to match the language of the most recently issued construction permits. Previously, only 1 paint booth was referenced.

EP-1A & EP-1B

These emission points are a resin chop spray booth. Associated emission unit is EU-1A. The raw materials are resin, catalyst and fiberglass. The control equipment associated is CE-1A, dry filters. This equipment is subject to NESHAP WWWW.
Opacity limit is 40%.
Emission limit for PM is 0.1 gr/dscf and 1.20 lb/hr.
Emission limit for PM_{10} is 0.20 lb/hr

EP-2A & EP-2B

These emission points are for the Flat Gel Coat/Flat Chop Spray Booth #1. Associated emission unit is EU-2A. The raw materials are resin, gel coat, catalyst, and fiberglass. The control equipment associated is CE-2A, dry filters. This equipment is subject to NESHAP WWWW.
Opacity limit is 40%.
Emission limit for PM is 0.01 gr/dscf
Emission limit for PM_{10} is 0.20 lb/hr
See permit detail for operational limits.

EP-3A & EP-3B

These emission points are for the Gel Coat Spray Booth. Associated emission unit is EU-3A. The raw materials are gel coat, and catalyst. The control equipment associated is CE-3A, dry filters. This equipment is subject to NESHAP WWWW.
Opacity limit is 40%.
Emission limit for PM is 0.01 gr/dscf
Emission limit for PM_{10} is 0.20 lb/hr
See permit detail for operational limits.

EP-4A & EP-4B

These emission points are for a Paint Spray Booth. Associated emission unit is EU-4A. The raw materials are primer, topcoat, reducer, thinner, and hardener. The control equipment associated is CE-4A, dry filters. Opacity limit is 40%. This equipment is subject to NESHAP MMMM. Application forms list the rated capacity for the primer as 5.95 gal/hr. This change was not included because the construction permit sets the applicable requirement and cannot be changes without first modifying 15-A-034-S1 and 15-A-044-S1.
Emission limit for PM is 0.01 gr/dscf
Emission limit for PM_{10} is 0.20 lb/hr
See permit detail for operational limits.

EP-9

The descriptions for the equipment associated with EP-9 were updated in construction project 26-205. This change has been updated throughout the permit. Associated emission units are EU-9A and EU-9B. The raw materials are gel coat and catalyst. The control equipment associated is CE-9, dry filters. Application forms list the rated capacity as 3.2 lb/hr for EU-9A and 17.12 lb/hr for EU-9B in the modification application. This change was not included because the construction permit sets the applicable requirement and cannot be changes without first modifying 15-A-046-S2.
This equipment is subject to NESHAP WWWW.
Emission limit for PM is 0.01 gr/dscf.
See permit detail for operational limits.

EP-10A & EP-10B

The emission point is a mold shop. Associated emission unit is EU-10. The raw materials are resin, gel coat, fiberglass chop, and catalyst. The control equipment associated is CE-10, dry filters. Operating condition 15.E.iii from construction permits 15-A-059-S1 and 15-A-060-S1 has not been included because it references equipment that no longer exists. This equipment is subject to NESHAP WWWW.
Opacity limit is 40%.
Emission limit for PM is 0.01 gr/dscf
Emission limit for PM_{10} is 0.20 lb/hr
See permit detail for operational limits.

EP-11A & EP11B

The emission point is Flat Gel Coat/Flat Chop Spray Booth #2. Associated emission unit is EU-11. The raw materials are resin, gel coat, fiberglass chop, and catalyst. The control equipment associated is CE-11, dry filters. Operating condition 15.E.iii from construction permits 15-A-061-S1 and 15-A-062-S1 has not been included because it references equipment that no longer exists. This equipment is subject to NESHAP WWWW.
Opacity limit is 40%.
Emission limit for PM is 0.01 gr/dscf
Emission limit for PM_{10} is 0.20 lb/hr
See permit detail for operational limits.

EP-13

This is emission point is for Spray Touch-up & Repair emission unit, EU-13 Raw materials include gelcoat and catalyst. No control equipment is present for this unit. EU-13 requires strict recordkeeping and monitoring established under NESHAP WWWW. Operating conditions were updated in the S1 version of the construction permit.
Opacity limit is 40%.
Emission limit for PM is 0.01 gr/dscf
See permit detail for operational limits.

EP-14

This is emission point is for Hand Lay-up Operations emission unit, EU-14 Raw materials include gelcoat and catalyst. No control equipment is present for this unit. EU-14 requires strict recordkeeping and monitoring established under NESHAP WWWW. The construction permit for EP-14 was modified in 2026 to update the operating limits. See permit details.

EP-15

New Unit. This is emission point is for Paint Spray Booth #2 emission unit, EU-15 Raw materials include paint solvent and primer. Particulate emissions are controlled by CE-15A and CE-15B, pre-filter and pocket filters. EU-15 requires strict recordkeeping and monitoring established under NESHAP MMMM. Similar to EP-13, cross references to daily and monthly requirements have been updated to match the corresponding requirement. Opacity limit is 40%. References to EU-8 within the operating conditions have been removed. These were errantly included in permit 25-A-065. The vacuum molding area process was removed and permit 15-A-045-S1 was rescinded 3/3/2017.
Emission limit for PM is 0.01 gr/dscf
Emission limit for PM, PM_{10}, and $PM_{2.5}$ is 0.17 lb/hr
See permit detail for operational limits.

EP-16

New Unit. This is emission point is for welding operations, EU-16. Particulate emissions for the North Building Welder are controlled by CE-16, cartridge filters and are fugitive and vented inside the building. The welders are limited to 52,000lb of welding electrode in any rolling 12-month period. Precontrol emissions do not exceed the major source threshold. CAM does not apply. Operating conditions meet the requirements of a facility O&M plan. No additional monitoring is recommended.
Opacity limit is 40%.
Emission limit for PM is 0.1 gr/dscf
Emission limit for PM, PM_{10}, and $PM_{2.5}$ is 3.42 lb/hr
See permit detail for operational limits.