

Prepared Feeds Manufacturing Facilities

Permitting Guidance for a facility affected under the “7D NESHAP” (40 CFR Part 63 Subpart DDDDDDD) that has been using the **Small Unit Exemption**

Air Construction Permit – Directions for Obtaining a Construction Permit

Step One – Inventory the equipment or operations that have air emissions

- A. Make a list of every piece of equipment at the facility that has the potential to emit an air contaminant into the air. This includes, but is not limited to: grain receiving pits/areas, grain handling, feed mixers, grain cleaning equipment, roller mills, hammermills, pellet cooler, feed load-out operations into truck or rail, storage bins, and boilers. It is not necessary to include plant roadways.
- B. After the equipment list is complete, indicate if the equipment: 1.) exhausts to the outside air, or 2.) is located outside, or 3.) is located inside a building and exhausts inside¹.
- C. For the equipment that exhausts outside or is located outside, indicate if the equipment was installed after September 23, 1970. If the installation date is unknown, assume that it was installed after September 23, 1970.
- D. Determine if any of the equipment identified in Step C above was ever issued an air construction permit. Check your plant records, and if you are unsure, contact Michael Hermsen (515-725-9577) or John Curtin (515-725-9522) of the Iowa DNR, Air Quality Bureau.
- E. Determine if any of the equipment identified in Step C is currently under the Small Unit Exemption (SUE). To be eligible for the SUE, you must have a signed Exemption Justification Document.
- F. For the equipment identified in Step C that does not have an air construction permit or is currently under the SUE, go to Step Two below.

¹The Department is not pursuing permit applications for equipment that exhausts inside. A company may choose to permit this equipment, however, to limit its annual emissions.

Step Two – Determine if equipment is eligible for an exemption

- A. Check to see if an exemption from construction permitting applies. The exemptions can be found at 567 Iowa Administrative Code (IAC) rule 22.1. A copy of rule 22.1 is available on the DNR’s website at <http://www.iowadnr.gov/Environmental-Protection/Air-Quality/Air-Toxics-NESHAP> (click on Prepared Feeds) and at <http://www.iowadnr.gov/Environmental-Protection/Air-Quality/Construction-Permits/Construction-Permitting-Materials> (scroll to Specific Application Forms & Guidance and click on Prepared Feeds). Or, contact Michael Hermsen (515-725-9577) or John Curtin (515-725-9522) of the Iowa DNR.
- B. The following equipment must obtain a permit because there is not an applicable exemption in rule 567-22.1: ingredient bins, feed mixers, pellet making equipment, pellet coolers², feed handling, feed bagging operations, bulk loadout of feed. The SUE can no longer be used for this equipment because the equipment is subject to requirements under the 7D NESHAP and must obtain a permit. [PERMIT REQUIRED]
- C. The following equipment may still be eligible for a permit exemption: grain receiving pits/areas, grain storage bins, grain handling, grain grinding/milling equipment, and boilers. Review the list of exemptions in IAC 22.1(2) and confirm the applicability of the specific exemption. If the Small

Unit Exemption will be used, prepare a Small Unit Exemption Justification Document (EJD). If an exemption cannot be used, a permit must be obtained. [PERMIT MAY BE REQUIRED]

² If the pellet cooler is located at a facility whose average daily feed production is greater than 50 tons per day.

Step Three – Apply for Air Construction Permits and Modify EJD (if necessary)

- A. Apply for an air construction permit for the equipment identified in Step Two that is required to have a permit [PERMIT REQUIRED] or that is not eligible for an exemption [PERMIT MAY BE REQUIRED]. If your facility has been operating under the SUE, please inform the DNR of this on Form CP.
- B. If your facility had used one EJD to document compliance with the SUE, modify the EJD to include only the equipment that is still eligible for exemption (See B. and C. of Step Two).
- C. Application forms can be obtained from the DNR’s website at:
<http://www.iowadnr.gov/Environmental-Protection/Air-Quality/Construction-Permits/Construction-Permitting-Materials>

Complete the following forms³:

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| 1. Form FI – Facility Information | ┌ | |
| 2. Form AF – Construction Permit Application Fee | | |
| 3. Form CP – Application Cover Page | → | One of each form |
| 4. Form EI – Emission Inventory | | per submittal |
| 5. Form GHG – Greenhouse Gas Emission Inventory | └ | |
| 6. Form EU – Emissions Unit Information | → | One per equipment/operation |
| 7. Form EP – Emission Point Information | → | One per emission point |
| 8. Form EC or Excel calculation spreadsheet | → | One per equipment or submittal |
| 9. Form CE - Control Equipment Information | ┌ | |
| Form CE1 – Fabric Filter Information | → | One form for each control |
| Form CE2 – Cyclone Information | └ | device used |

³ Additional information may be required by the DNR review engineer.

- D. To complete each form, please follow the individual instructions contained on the forms. For the emissions calculations, requested of Form EC, please use the calculator provided by the Iowa DNR (available from the DNR’s website at <http://www.iowadnr.gov/Environmental-Protection/Air-Quality/Construction-Permits/Construction-Permitting-Materials> (scroll down and click on Prepared Feeds)). Complete the spreadsheet for the equipment you are permitting and print and submit the results along with forms. To use the spreadsheet, input the required information, indicated by highlighted (yellow) cells in the spreadsheet, and your emissions will be automatically calculated. If you are requesting an annual limit on hours or throughput to limit the annual emissions, input these limits as part of the required information in the spreadsheet.
- E. For assistance, contact Michael Hermsen Michael.Hermsen@dnr.iowa.gov (515-725-9577), John Curtin John.Curtin@dnr.iowa.gov (515-725-9522), or the Permit Help Line (1-877-AIR-IOWA). One signed copy of the completed forms should be submitted to: Iowa DNR – Air Quality Bureau, Permit Log In, 7900 Hickman Road, Suite 1, Windsor Heights, IA 50324.