

# **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.

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

1. MidAmerican Energy Company – Walter Scott Jr. Energy Center, located at 7215 Navajo Street, Council Bluffs, IA has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Richard Parker.
2. MidAmerican Energy Company – Walter Scott Jr. Energy Center is an electric services facility. This facility consists of 63 emission units with potential emissions of:

| <b>Pollutant</b>                              | <b>Abbreviation</b> | <b>Potential Emissions<br/>(Tons per Year)</b> |
|---|---------------------|--|
| Particulate Matter ( $\leq 2.5 \mu\text{m}$ ) | PM <sub>2.5</sub>   | 1,806.76                                       |
| Particulate Matter ( $\leq 10 \mu\text{m}$ )  | PM <sub>10</sub>    | 1,894.02                                       |
| Particulate Matter                            | PM                  | 2,229.27                                       |
| Sulfur Dioxide                                | SO <sub>2</sub>     | 6,734.79                                       |
| Nitrogen Oxides                               | NO <sub>x</sub>     | 8,973.39                                       |
| Volatile Organic Compounds                    | VOC                 | 265.36   |
| Carbon Monoxide                               | CO                  | 19,360.94                                      |
| Lead  | Lead                | 1.74   |
| Hazardous Air Pollutants <sup>(1)</sup>       | HAP                 | 245.67   |

<sup>(1)</sup> May include the following: See Permit Application.

3. MidAmerican Energy Company – Walter Scott Jr. Energy Center submitted a Title V Operating Permit renewal application on October 18, 2022. 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.

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

1. The public comment period for the draft permit will run from June 5, 2025 through July 5, 2025. 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.
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.

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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 Permit Review Notes**

|            |  |
|------------|--|
| Applicant: | <b>MidAmerican Energy Co. - Walter Scott Jr. Energy Center</b> |
| SIC Code:  | 4911 (Electric Services)                                       |
| City:      | Council Bluffs   |
| County:    | Pottawattamie  |
| EIQ#:      | 92-3600  |
| Facility#: | 78-01-026  |
| Permit #:  | 97-TV-001R4  |
| Reviewer:  | Derek Wedemeier  |
| Date:      | <b>**DATE**</b>  |

### **Facility Identification**

|                       |   |
|-----------------------|---|
| Facility Name:        | MidAmerican Energy Co. - Walter Scott Jr. Energy Center |
| Facility Location:    | 7215 Navajo Street, Council Bluffs, IA 51501            |
| Responsible Official: | Mr. Richard Parker                                      |
| Phone:                | (712) 352-5458  |

### **Background**

MidAmerican Energy Co. - Walter Scott Jr. Energy Center is an Electric Services plant (SIC 4911). MidAmerican Energy Co. - Walter Scott Jr. Energy Center has applied to renew their Part 70 Title V Operating Permit. This is the third renewal. The facility consists of 55 significant emission points, 63 emission units and 25 insignificant units.

Facility's name was changed from MidAmerican Energy Company Council Bluff Center to MidAmerican Energy –Walter Scott Jr. Energy Center per administrative modification application on 08/21/2007. The Title V contact person is Ms. Shannon Parks.

### **Regulatory Status**

- Title V Major Source Status by Pollutant

**Table 1: Title V Major Source by Pollutant**

| <b>Pollutant</b> | <b>Major for Title V?</b>           |
|------------------|-------------------------------------|
| PM <sub>10</sub> | <input checked="" type="checkbox"/> |
| SO <sub>2</sub>  | <input checked="" type="checkbox"/> |
| NO <sub>x</sub>  | <input checked="" type="checkbox"/> |
| VOC              | <input checked="" type="checkbox"/> |
| CO               | <input checked="" type="checkbox"/> |
| Lead             | <input type="checkbox"/>            |
| Individual HAP   | <input checked="" type="checkbox"/> |
| Total HAPs       | <input checked="" type="checkbox"/> |

This facility emits more than 25 ton/yr of HAPs. Refer to the application for the list of all the HAPs.

## Current Emission Points & Construction Permits

**Table 2: List of Current Emission Points & Construction Permits**

| <b>Emission Point Number</b> | <b>Emission Unit Number</b> | <b>Emission Unit Description</b>          | <b>DNR Construction Permit Number</b> |
|------------------------------|-----------------------------|---|---------------------------------------|
| EP-003                       | EU-003                      | WSEC 3 Boiler - Coal                      | 75-A-357-P10<br>(modified)            |
|                              |                             | WESC 3 Boiler - #2 Fuel Oil               |                                       |
| EP-006                       | EU-006                      | Dumper Building                           | 03-A-436-P2                           |
| EP-009                       | EU-009                      | Transfer House #1 - Coal Conveying        | 78-A-169-S5                           |
| EP-010                       | EU-010                      | Transfer House #2 - Coal Conveying        | 03-A-438-P2                           |
|                              | EU-117A                     | Emergency Reclaim Hopper to Belt 8        |                                       |
| EP-011                       | EU-011                      | Transfer House #3 - Coal Conveying        | 78-A-171-S2                           |
| EP-013                       | EU-013                      | Transfer House #4 - Coal Conveying        | 03-A-439-P2                           |
| EP-014                       | EU-014                      | East Coal Silo #3 - Coal Conveying        | 78-A-174-S4                           |
| EP-015                       | EU-015                      | West Coal Silo #3 - Coal Conveying        | 78-A-175-S3                           |
| EP-018                       | EU-018                      | Ash Haul Road                             | 03-A-425-P5<br>75-A-357-P10           |
| EP-019                       | EU-019A                     | CCR Monofill Disposal                     | None                                  |
|                              | EU-019B                     | CCR Monofill Grading                      |                                       |
|                              | EU-019C                     | CCR Monofill Erosion                      |                                       |
| EP-020                       | EU-020                      | Flyash Truck Loading #3                   | None                                  |
| EP-025                       | EU-025                      | Glycol System Expansion Tank              | None                                  |
| EP-027                       | EU-027                      | Unit 1, 2, &3 Diesel Engine for Fire Pump | None                                  |
| EP-030                       | EU-030                      | Stockout Conveyor 7 Coal Conveying        | 03-A-425-P5<br>78-A-169-S5            |
| EP-031                       | EU-031A                     | Stacker/Reclaimer                         | 03-A-425-P5                           |
|                              | EU-031B                     | Stacker/Reclaimer                         |                                       |
|                              | EU-031C                     | Stacker/Reclaimer                         |                                       |
|                              | EU-031D                     | Stacker/Reclaimer                         |                                       |
| EP-114                       | EU-114                      | Unit 3 Emergency Generator                | 11-A-610                              |
| EP-117B                      | EU-117B                     | Emergency Reclaim Hopper - Coal Dumping   | 78-A-172-S1                           |
| EP-141                       | EU-141                      | Unit #4 Boiler - #2 Fuel Oil              | 03-A-425-P5<br>(modified)             |
|                              |                             | Unit #4 Boiler – Sub-bituminous Coal      |                                       |
| EP-142                       | EU-142                      | Unit #4 AUX Boiler - Natural Gas          | 03-A-426-P2                           |
| EP-143                       | EU-143                      | Unit #4 Emergency Generator #2 Fuel Oil   | 03-A-428-P1                           |
| EP-144                       | EU-144                      | Unit #4 Diesel Fire Pump                  | 03-A-429-P1                           |
| EP-145                       | EU-145                      | Unit #4 Cooling Tower                     | 03-A-427-P1                           |
| EP-005                       | EU-005A                     | Coal Pile Bulldozing                      | 03-A-425-P5                           |
|                              | EU-005B                     | Inactive Coal Pile                        |                                       |
|                              | EU-005C                     | Active Coal Pile                          |                                       |
| EP-151                       | EU-151                      | Rail Unloading Stockout                   |                                       |
| EP-160                       | EU-160                      | Unit #4 Coal Silos                        | 03-A-440-P2                           |
| EP-161                       | EU-161                      | Unit #4 Lime Storage Day Bin              | 07-A-385-P                            |
| EP-162A                      | EU-162A                     | Unit #4 Lime Exhauster #1                 | 03-A-435-P1                           |
| EP-162B                      | EU-162B                     | Unit #4 Lime Exhauster #2                 | 07-A-386-P                            |
| EP-163                       | EU-163                      | Unit #4 Lime Silo                         | 03-A-434-P2                           |
| EP-164                       | EU-164                      | Unit #4 Urea Dissolver Tank               | 03-A-442-P2                           |
| EP-165A                      | EU-165A                     | Unit #4 Activated Carbon Silo             | 07-A-387-P                            |

| Emission Point Number | Emission Unit Number | Emission Unit Description                        | DNR Construction Permit Number |
|-----------------------|----------------------|--|--------------------------------|
| EP-165B               | EU-165B              | Unit #4 Activated Carbon Silo                    | 07-A-388-P                     |
| EP-167                | EU-167               | Unit #4 Flyash/FGD Waste Silo                    | 03-A-433-P3                    |
| EP-168                | EU-168               | Unit #4 Flyash/FGD Waste Exhauster#1             | 03-A-430-P2                    |
| EP-169                | EU-169               | Unit #4 Flyash/FGD Waste Exhauster#2             | 03-A-431-P2                    |
| EP-170                | EU-170               | Unit #4 Flyash/FGD Waste Exhauster#3             | 03-A-432-P2                    |
| EP-171                | EU-171               | Unit #4 Flyash/FGD Recycle Exhauster#1           | 07-A-389-P                     |
| EP-172                | EU-172               | Unit #4 Flyash/FGD Recycle Exhauster#2           | 07-A-390-P                     |
| EP-173                | EU-173               | Unit #4 Flyash/FGD Recycle Exhauster#3           | 07-A-391-P                     |
| EP-174                | EU-174               | Unit #4 Flyash/FGD Recycle Silo                  | 07-A-392-P2                    |
| EP-180                | EU-180               | Unit #4 Water Treatment Area Lime Storage Silo A | 07-A-393-P                     |
| EP-181                | EU-181               | Unit #4 Water Treatment Area Lime Storage Silo B | 07-A-394-P                     |
| EP-182                | EU-182               | Unit #4 Water Treatment - Soda Ash Silo          | 07-A-395-P                     |
| EP-200                | EU-200               | Unit #3 Flyash/FGD Waste Silo                    | 06-A-766-P1                    |
| EP-201                | EU-201               | Unit #3 Flyash/FGD Waste Exhauster#1             | 06-A-767-P1                    |
| EP-202                | EU-202               | Unit #3 Flyash/FGD Waste Exhauster#2             | 06-A-768-P1                    |
| EP-203                | EU-203               | Unit #3 Flyash/FGD Waste Exhauster#3             | 08-A-636-P                     |
| EP-204                | EU-204               | Unit #3 Lime Unloading Exhauster#1               | 06-A-769-P1                    |
| EP-205                | EU-205               | Unit #3 Lime Unloading Exhauster#2               | 06-A-770-P1                    |
| EP-207                | EU-207               | Unit #3 Lime Silo                                | 06-A-772-P1                    |
| EP-208                | EU-208               | Unit #3 Recycle Ash Silo                         | 06-A-773-P1                    |
| EP-209                | EU-209               | Unit #3 Flyash/FGD Recycle Exhauster#1           | 06-A-774-P1                    |
| EP-210                | EU-210               | Unit #3 Flyash/FGD Recycle Exhauster#2           | 06-A-775-P1                    |
| EP-211                | EU-211               | Unit #3 Flyash/FGD Recycle Exhauster#3           | 06-A-776-P1                    |
| EP-212                | EU-212               | Mercury (Hg) Control Sorbent Storage Silo        | 14-A-461-P1                    |

### **Program Applicability**

- ✓ PSD: YES
- ✓ Part 61 NESHAP: YES  
This facility is subject to Part 61 NESHAP Subpart A and Subpart M.
- ✓ Part 63 NESHAP:  
NESHAP Subpart A  
Units subject to the subparts listed below are also subject to Subpart A – General Provisions.  
NESHAP Subpart B:  
EP-141 is subject to NESHAP Subpart B.  
NESHAP Subpart ZZZZ:  
Stationary combustion engines at the facility (EP-114, EP-143, EP-144 and EP-027) are subject to National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE NESHAP) [40 CFR Part 63 Subpart ZZZZ].

NESHAP Subpart DDDDD:

EP-142 is subject to National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters (Boiler MACT) [40 CFR Part 63 Subpart DDDDD].

NESHAP Subpart UUUUU:

The boilers EP-003 and EP-141 are subject to National Emission Standards for Hazardous Air Pollutants from Coal- and Oil-fired Electric Utility Steam Generating Units [40 CFR 63 Subpart UUUUU]

✓ NSPS: YES

| NSPS Table |         |   |              |                 |
|------------|---------|---|--------------|-----------------|
| EP         | EU      | Source Description                      | Permit #     | NSPS            |
| EP-003     | EU-003  | WSEC #3 Boiler                          | 72-A-357-P10 | NSPS A; NSPS D  |
| EP-006     | EU-006  | Dumper Building                         | 03-A-436-P2  | NSPS A; NSPS Y  |
| EP-009     | EU-009  | Transfer House #1 - Coal Conveying      | 78-A-169-S5  | NSPS A; NSPS Y  |
| EP-010     | EU-010  | Transfer House #2 - Coal Conveying      | 03-A-438-P2  | NSPS A; NSPS Y  |
|            | EU-117A | Emergency Reclaim Hopper to Belt #8     |              |                 |
| EP-011     | EU-011  | Transfer House #3 - Coal Conveying      | 78-A-171-S2  | NSPS A; NSPS Y  |
| EP-013     | EU-013  | Transfer House #4 - Coal Conveying      | 03-A-439-P2  | NSPS A; NSPS Y  |
| EP-014     | EU-014  | East Coal Silo #3 - Coal Conveying      | 78-A-174-S4  | NSPS A; NSPS Y  |
| EP-015     | EU-015  | West Coal Silo #3 - Coal Conveying      | 78-A-175-S3  | NSPS A; NSPS Y  |
| EP-114     | EU-114  | Unit 3 Emergency Generator              | 11-A-610     | NSPS IIII       |
| EP-117B    | EU-117B | Emergency Reclaim Hopper - Coal Dumping | 78-A-172-S1  | NSPS A; NSPS Y  |
| EP-141     | EU-141  | Unit #4 Boiler                          | 03-A-425-P5  | NSPS A; NSPS Da |
| EP-160     | EU-160  | Unit #4 Coal Silos                      | 03-A-440-P2  | NSPS A; NSPS Y  |

✓ Acid Rain: YES

✓ CSAPR: YES

At the time of permit issuance these units (EP-003 and EP-141) are subject to the requirements of the Cross-State Air Pollution Rule (CSAPR) rule outlined in 40 CFR Part 97.

✓ Stratospheric Ozone Protection: YES

✓ Prevention of Accidental Releases: NO

✓ CAM: YES

**Emission Estimates**

| Potential Emissions in Tons per Year: |                  |          |                 |                 |        |           |      |            |
|---------------------------------------|------------------|----------|-----------------|-----------------|--------|-----------|------|------------|
| PM <sub>2.5</sub>                     | PM <sub>10</sub> | PM       | SO <sub>2</sub> | NO <sub>x</sub> | VOC    | CO        | Lead | Total HAPs |
| 1,806.76                              | 1,894.02         | 2,299.27 | 6,734.79        | 8,973.39        | 265.36 | 19,360.94 | 1.74 | 245.67     |
| Actual Emissions – 2024*              |                  |          |                 |                 |        |           |      |            |
| 345.13                                | 594.91           | 636.22   | 3,006.02        | 4,433.78        | 67.17  | 4,061.17  | 0.24 | 23.45      |

\*2024 values reported in SLEIS.

## **General Conditions**

### **Plant-Wide Conditions:**

See plant-wide conditions for general limits for opacity, SO<sub>2</sub>, particulate matters and fugitive emissions. NSPS and NESHAP requirements are also included in the Plant-Wide Condition section. See permit content for details.

**Application History:** this is the fourth Renewal Title V application of MidAmerican Energy Co. - Walter Scott Jr. Energy Center. MidAmerican Energy Co. - Walter Scott Jr. Energy Center submitted the fourth Title V renewal application on October 18, 2022.

## **Changes in Insignificant Activities**

### **Insignificant Units Added in the 2022 Application:**

| <b>EU</b> | <b>Emission Unit Description</b> |
|-----------|----------------------------------|
| EU-216    | Diesel Fuel AST                  |

### **EU-216:**

The facility has listed the diesel fuel AST in Form 1.3: Insignificant Activities of the application. EU-216 qualifies as an insignificant unit and is included in the Title V permit.

### **Removed Insignificant Units**

EU-130: Unit 1 & 2 Lube Oil Emergency, removed during facility review (3/26/2025)

EU-NR101: Fuel Oil UST (10,000 gallons), removed during facility review (3/26/2025).

Preplaced with EU-216.

## **Changes in Significant Activities**

| <b>EP</b> | <b>Construction Permit</b> | <b>Note</b>  |
|-----------|----------------------------|--|
| EP-003    | 75-A-357-P9                | Established Regional Haze SO <sub>2</sub> limit (P9 Version)<br>Modified approved chemical list in Condition 5, modify temp and airflow (P8 Version) |

### **Regional Haze Limit**

| <b>Pollutant</b>                  | <b>lb/hr</b>       | <b>tons/yr</b> | <b>Other Limits</b> | <b>Reference/Basis</b> |
|-----------------------------------|--------------------|----------------|---------------------|------------------------|
| Sulfur Dioxide (SO <sub>2</sub> ) | 770 <sup>1,2</sup> | NA             | NA                  | 567 IAC 22.9(6)        |

<sup>1</sup>Limit based on 72 percent reduction of SO<sub>2</sub> emissions from the baseline years of 2017 to 2019. Compliance with the limit is based on continuous emissions monitoring as specified in permit condition 6.

<sup>2</sup>Limit based on 30-day rolling average. Limit is applicable at all times including periods of Boiler 3 startup, shutdown, and malfunction.

- Emission limits section has been updated to include Regional Haze Limit established in P9 version of the construction permit. .
- List of approved mercury controls have been updated to match 75-A-357-P10.

- c. Several requirements of condition 5 of construction permit 75-A-357-P10 have been removed from EP003 and moved to fugitive sources which these requirements are specific to including EP-018, 019, 030, 031, 005, and 151.
- d. Condition 5M of construction permit 75-A-357-P10 was removed because Units 1 & 2 have been demolished (completed 1/26/2022).
- e. Regional Haze requirements were added to the Operational Limits & Reporting/Recordkeeping Requirements. The facility was granted a variant to extend the 60 day deadline an additional 60 days. The initial study results & operational monitoring plan were submitted 6/27/2024. IDNR and MEC met to discuss this plan 10/24/2024 and IDNR granted until 1/21/2025. On 3/25/2025 IDNR approved the plan.
- f. Operational Limits & Reporting/Recordkeeping were updated to match the most recent construction permit.
- g. Specific conditions for NESHAP UUUUU have been added.
- h. Emission point characteristics were updated to modify temperature and airflow.
- i. Stack testing will be required for PM and PM10. The first test will be required within 12 months of permit issuance and the 2<sup>nd</sup> test will be required between 30 months and 42 months of permit issuance.

#### EP-018

- a. References to Units 1 and 2 were removed. This equipment no longer exists.
- b. Several operating conditions specific to this equipment were moved from EP-003.

#### EP-019

- a. Operating conditions from 75-A-357-P10 specific to this equipment were moved to EP-19 section of Applicable Requirements.

#### EP-027

- a. Operation and Maintenance requirements referencing “annual” have been updated to “1 year + 30 days” to match the revised NESHAP ZZZZ requirements.

#### EP-141

- a. Specific conditions for NEHSAP UUUUU have been added.
- b. Operational conditions from the current construction permit version and the draft version of 03-A-425-P5 have been added to capture changes.
- c. Conditions 5.Y-DD of construction permit 03-A-425-S5 regarding fugitive emission sources have been moved to the applicable emission point. Conditions Y and BB have been included with EP-018. Condition HH has been moved to EP-019. Conditions Z & CC have been included with EP-030 & EP-031. Conditions AA and DD have been included with EP-005 & EP-151.
- d. Stack testing will be required for PM and PM10. The first test will be required within 12 months of permit issuance and the 2<sup>nd</sup> test will be required between 30 months and 42 months of permit issuance.

#### EP-144



- a. Operation and Maintenance requirements referencing “annual” have been updated to “1 year + 30 days” to match the revised NESHAP ZZZZ requirements.

No other changes have been made to this renewal permit.

**General Comments:**

Facility calculations for EP-114 used 500 hr of operation when determining PTE. The DNR PTE spreadsheet uses the operating limit 5,685hr of operation established by construction permit 11-A-610.

**Periodic Monitoring Table**

| Emission Point   | Construction Permit        | Control Equipment                               | Type of O&M Plan | Stack Test                                 | Previous Test Date |
|------------------|----------------------------|---|------------------|--|--------------------|
| EP-003           | 75-A-357-P9                | See Permit                                      | CAM              | Yes - See Permit/CEMS                      | 2021               |
| EP-006           | 03-A-436-P2                | CE-006: Baghouse                                | CAM              | 1 Test: PM & PM10                          | 2004               |
| EP-009           | 78-A-169-S5                | CE-010: Baghouse                                | CAM              | 1 Test: PM & PM10                          | 2008               |
| EP-010           | 03-A-438-P2                | CE-011: Baghouse                                | CAM              | 1 Test: PM                                 | 2009               |
| EP-011           | 78-A-171-S2                | CE-012: Baghouse                                | CAM              | PM – Waived <sup>(1)</sup><br>1 Test: PM10 | 2000               |
| EP-013           | 03-A-439-P2                | CE-013: Baghouse                                | CAM              | 1 Test: PM                                 | 2008               |
| EP-014           | 78-A-174-S4                | CE-014: Baghouse                                | CAM              | PM – Waived <sup>(1)</sup>                 | 2009               |
| EP-015           | 78-A-175-S3                | CE-015: Baghouse                                | CAM              | PM – Waived <sup>(1)</sup>                 | 2009               |
| EP-018           | 03-A-425-P4<br>75-A-357-P9 | CE-019: Water Spray/Sweeping & Dust Suppressant | Agency*          | NA   | NA                 |
| EP-030<br>EP-031 | 03-A-425-P4<br>78-A-169-P4 | CE-005: Dust Suppressant                        | Facility*        | NA   | NA                 |
| EP-141           | 03-A-425-P4                | See Permit                                      | CAM              | Yes – See Permit/CEMS                      | 2021               |
| EP-145           | 03-A-427-P1                | CE-145: Drift Eliminator                        | Facility         | NA   | NA                 |
| EP-160           | 03-A-440-P2                | CE-160: Baghouse                                | Facility         | No – Tested at <9% of the emission limit   | 2007               |
| EP-167           | 03-A-433-P3                | CE-167: Baghouse                                | Facility         | NA   | NA                 |
| EP-168           | 03-A-430-P2                | CE-168: Baghouse                                | Facility         | NA   | NA                 |
| EP-169           | 03-A-431-P2                | CE-169: Baghouse                                | Facility         | NA   | NA                 |
| EP-170           | 03-A-432-P2                | CE-168 or CE-169                                | Facility         | NA   | NA                 |
| EP-171           | 07-A-389-P                 | CE-171: Baghouse                                | Facility         | NA   | NA                 |
| EP-172           | 07-A-390-P                 | CE-172: Baghouse                                | Facility         | NA   | NA                 |
| EP-173           | 07-A-391-P                 | CE-171 or CE-172                                | Facility         | NA   | NA                 |
| EP-180           | 07-A-393-P                 | CE-180: Baghouse                                | None             | NA   | NA                 |
| EP-181           | 07-A-394-P                 | CE-181: Baghouse                                | None             | NA   | NA                 |
| EP-182           | 07-A-395-P                 | CE-182: Baghouse                                | None             | NA   | NA                 |
| EP-200           | 06-A-766-P1                | CE-200: Baghouse                                | Facility         | NA   | NA                 |
| EP-201           | 06-A-767-P1                | CE-201: Baghouse                                | Facility         | NA   | NA                 |
| EP-202           | 06-A-768-P1                | CE-201 or CE-202                                | Facility         | NA   | NA                 |
| EP-203           | 08-A-636-P                 | CE-202: Baghouse                                | Facility         | NA   | NA                 |
| EP-204           | 06-A-769-P1                | CE-204: Baghouse                                | Facility         | NA   | NA                 |
| EP-205           | 06-A-770-P1                |   |                  | NA   | NA                 |

| Emission Point | Construction Permit | Control Equipment       | Type of O&M Plan | Stack Test | Previous Test Date |
|----------------|---------------------|-------------------------|------------------|------------|--------------------|
| EP-207         | 06-A-772-P1         | CE-207: Baghouse        | Facility         | NA         | NA                 |
| EP-208         | 06-A-773-P1         | CE-208: Baghouse        | Facility         | NA         | NA                 |
| EP-209         | 06-A-774-P1         | CE-209: Baghouse        | Facility         | NA         | NA                 |
| EP-210         | 06-A-775-P1         | CE-209 or CE210         | Facility         | NA         | NA                 |
| EP-211         | 06-A-776-P1         | CE-210: Baghouse        | Facility         | NA         | NA                 |
| EP-212         | 14-A-461-P1         | CE-212: Bin Vent Filter | Facility         | NA         | NA                 |

\*Conditions within the Operating limits and Recordkeeping/Reporting meet the requirements of the suggested O&M Plan.

<sup>(1)</sup> Stack tests have been waived for PM at EP11, EP14, & EP15. These are baghouse controlled units with emission limits of 0.1gr/dscf. Baghouses are capable of achieving control down to and below 0.002 gr/dscf regularly. Based on this margin and the requirements of CAM, stack testing will not be required during this renewal.

### **CAM Requirements**

CAM applicability was determined using emission limits, AP-42 factors, and stack testing data. A CAM plan can be found following the emission point applicable requirements for EP-003 and EP-141 or in Appendix A of the permit for the following emission points: 006, 009, 010, 011, 013, 014, and 015.

=====END OF NOTES=====