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. Ag Processing Inc. Algona, located at 2108 140th Avenue, Algona, IA 50511 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Lou Rickers.
- 2. Ag Processing Inc. Algona is an industrial organic chemicals facility. This facility consists of 16 emission units with potential emissions of:

| Pollutant | Abbreviation | Potential Emissions (Tons per Year) |
|--|-------------------|--|
| Particulate Matter ($\leq 2.5 \mu m$) | PM _{2.5} | 13.37 |
| Particulate Matter ($\leq 10 \ \mu m$) | PM10 | 34.07 |
| Particulate Matter | PM | 91.07 |
| Sulfur Dioxide | SO ₂ | 15.37 |
| Nitrogen Oxides | NO _x | 66.83 |
| Volatile Organic Compounds | VOC | 47.31 |
| Carbon Monoxide | СО | 38.35 |
| Lead | Lead | 0 |
| Hazardous Air Pollutants ⁽¹⁾ | HAP | 22.07 |

⁽¹⁾ May include the following: Formaldehyde, hexane, methanol, toluene.

- 3. Ag Processing Inc. Algona submitted a Title V Operating Permit renewal application on November 20, 2024. 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:

- The public comment period for the draft permit will run from June 19, 2025 through July 19, 2025. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Zane Peters 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 Zane Peters 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.

Zane Peters Iowa Department of Natural Resources - Air Quality Bureau 6200 Park Ave Ste #200 Des Moines, Iowa 50321 Phone: (515) 808-0458 E-mail: zane.peters@dnr.iowa.gov

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 Renewa | l 1 | Review Notes |
|------------------------------|-----|---------------------|
|------------------------------|-----|---------------------|

| Facility Name: | Ag Processing Inc Algona |
|---------------------|--------------------------|
| City: | Algona |
| County: | Kossuth |
| Facility #: | 55-01-032 |
| EIQ #: | 92-6977 |
| Renewal Application | 11/20/2024 |
| Received: | |
| Permit #: | 15-TV-008R2 |
| Reviewer: | Zane Peters |

Background:

Ag Processing, Inc. - Algona is a biodiesel production facility (SIC 2869). Facility is permitted to process 72 million gallons per year of biodiesel. The facility consists of 6 emission points, 16 emissions units and 13 insignificant units. The Title V application for renewal was received on November 20, 2024.

Title V Applicability

| Pollutant | Major for Title V? |
|-----------------|--------------------|
| PM_{10} | |
| SO ₂ | |
| NO _x | |
| VOC | |
| СО | |
| Lead | |
| Individual HAP | \square |
| Total HAPs | |

Program Applicability

- PSD: No,
- Title V: Yes
- Part 60 NSPS: Yes
 - o 40 CFR 60 Subpart A General Provisions
 - 40 CFR 60 Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
 - 40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels)
 - 40 CFR 60 Subpart IIII Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

- 40 CFR 60 Subpart NNN Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations
- 40 CFR 60 Subpart RRR Standards of Performance for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes
- 40 CFR 60 Subpart VV Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006
- Part 61 NESHAP: No
- Major Source of HAPs: Yes.
- Part 63 NESHAP: Yes
 - 40 CFR 63 Subpart A National Emission Standards for Hazardous Air Pollutants for Source Categories – General Provisions
 - 40 CFR 63 Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters
 - 40 CFR 63 Subpart FFFF National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing
 - 40 CFR 63 Subpart UU National Emission Standards for Equipment Leaks -Control Level 2 Standards
 - 40 CFR 63 Subpart ZZZZ National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines
- Acid Rain: No.
- Stratospheric Ozone Protection: Yes.
- Prevention of Accidental Releases: No.

Changes Since the Last Issuance

General Changes

- Responsible Official and Director of Air Operating Permits updated (pp. 1)
- Permit number and relevant dates updated
- 567 IAC rule references updated throughout the permit in accordance with Executive Order 10
- General Conditions added (pp. 27)
- Appendix B: Executive Order 10 Rules Crosswalk added (pp. 43)

Emission Point-Specific Changes

- EU 6.117 Rated capacity updated (pp. 5)
- EU 8.233 removed from the Insignificant Activities Equipment List (pp. 5)

Periodic Monitoring Guidance

All periodic monitoring requirements are in accordance with the Department's Periodic Monitoring Guidance Document.

According to the calculations submitted in the renewal permit application, no CAM plans are required. EP 1 is exempt from CAM (Post 90 NSPS/NESHAP exemption).

Stack Testing

Testing is effective on the initial use of 100% biodiesel for PM, PM_{10} and CO for EP 2.00A and 2.00B.

EP 2.00 and 2.00B

- NO_x testing is required for each 20% increment of biodiesel blended fuel (i.e. biodiesel plus fuel oil #1 and/or fuel oil #2) and 100% pure biodiesel.
- The owner or operator shall obtain a sulfur (S) fuel analysis for each 20% increment of biodiesel blended fuel including 100% pure biodiesel combusted.
- Opacity Testing is required per 40 CFR §60.40c(c) and 40 CFR §60.8 and is required to be completed for fuel oil #1, fuel oil #2, and each type of blended fuel (i.e. biodiesel plus fuel oil #1, and/or fuel oil #2 in any percentage).