Iowa Department of Natural Resources
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. John Deere Des Moines Works, located at 825 SW Irvinedale Drive, Ankeny, IA 50023 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Rosalind Fox.
2. John Deere Des Moines Works is a farm machinery and equipment manufacturer. This facility consists of 97 significant emission units with potential emissions of:

Pollutant	**Abbreviation**	**Potential Emissions** (Tons per Year)
Particulate Matter (≤ 2.5 μm)	$PM_{2.5}$	39.80
Particulate Matter (≤ 10 μm)	PM_{10}	40.02
Particulate Matter	PM	41.29
Sulfur Dioxide	SO_2	2.31
Nitrogen Oxides	NO_x	104.10
Volatile Organic Compounds	VOC	227.58
Carbon Monoxide	CO	70.25
Lead	Lead	0.01
Hazardous Air Pollutants [(1)]	HAP	15.26

[(1)]May include the following: acetaldehyde, acrolein, chromium compounds, cobalt compounds, cumene, ethyl benzene, formaldehyde, glycol ethers, hexane, manganese compounds, methanol, methyl isobutyl ketone, naphthalene, nickel, propionaldehyde, toluene, and xylenes.

3. John Deere Des Moines Works submitted a Title V Operating Permit renewal application on February 14, 2025. 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 July 31, 2025 through August 30, 2023. 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. During this time, anyone may submit written comments on the permit. Mail signed comments to Jeff Gabby at the Polk County address shown below.
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 Jeff Gabby at the Polk County 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 20-35, 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 20-35.
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 or Polk County from pursuing enforcement action for any violation.

Worksheet of Air Operating Permit **Farm Machinery and Equipment Manufacturer**

(SIC 3523) (NAICS 333111)

Applicant: John Deere Des Moines Works
EIQ #: 92-6800
Facility File Number: 77-01-035
Reviewing Engineer: Jeff Gabby

A. Project Briefing:

John Deere Des Moines Works is located at 825 SW Irvinedale Drive, Ankeny Iowa. John Deere Des Moines Works is engaged in manufacturing farm machinery and equipment, for use in the preparation and maintenance of soil; planting and harvesting of crop; preparing crops for market on the farm; or for use in performing other farm operations and processes. Equipment manufactured at the facility include sprayers, cotton pickers, tillage, and grain drills. This project requires a Part 70 Title V R3 Renewal Permit to operate the following significant emission units:
(EU 02-10 / EP 02-P10)(EU 02-32 / EP 02-32, 02-37)(EU 02-35/EP 02-35)(EU 02-38/EP 02-38)(EU 02-39/EP 02-39)(EU 03-02/EP 03-02) (EU 02-OX2 / CE 02-OX / EP 02-OXf) (EU 03-OX1 / CE 03-OX / EP 03-OXf) (EU 03-27/EP 03-27)(EU 03-30/EP 03-30)(EU 03-31/EP 03-31)(EU 11-08 / CE 11-08 / EP 11-08) (EU 11-09 / EP 11-09)(EU 11-10 / EP 11-10, 11-11) (EU 11-13 / EP 11-13, 11-14)(EU 11-15 / EP 11-15)(EU 11-20 / CE 11-20 / EP 11-20)(EU 16-01 / EP 16-01) (EU 26-01 / CE 26-01 / EP 26-01) (EU 40-01 / EP 40-01) (EU 2X-Gen / EP 2X-Gen) , (EU 10-Gen / EP 10-Gen) (EU 57-Gen / EP 57-Gen) (EU CT-02 / EP CT-02) [(EU 02-G1 / CE 02/G1 / EP 02-G1) (EU 02-G2A, 02-G2B / CE 02-G2 / EP 02-G2) (EU 02-G3B, 02-G3C / CE 02-G3 / EP 02-G3) (EU 02-G8 / CE 02-G8 / EP 02-G8) (EU 02-G9 / CE 02-G9 / EP 02-G9) (EU 02-G10 / CE 02-G10 / EP 02-G10) (EU 02-G11 / CE 02-G11 / EP 02-G11) (EU 02-G12 / CE 02-G12 / EP 02-G12) (EU 02-G13 / CE 02-G13 / EP 02-G13) (EU 02-G17 / CE 02-G17 / EP 02-G17) (EU 02-G18 / CE 02-G18 / EP 02-G18) (EU 02-G19 / CE 02-G19 / EP 02-G19) (EU 02-G20 / CE 02-G20 / EP 02-G20) (EU 02-G21 / CE 02-G21 / EP 02-G21) (EU 02-G24, 02-G25 / CE 02-G24 / EP 02-G24) (EU 02-G26 / CE 02-G26 / EP 02-G26) (EU 02-G27 / CE 02-G27 / EP 02-G27) (EU 02-G28 / CE 02-G28 / EP 02-G28) (EU 02-G29 / CE 02-G29 / EP 02-G29) (EU 02-G30 / CE 02-G30 / EP 02-G30) (EU 02-G31 / CE 02-G31 / EP 02-G31) (EU 02-G32 / CE 02-G32 / EP 02-G32) (EU 02-G33 / CE 02-G33 / EP 02-G33) (EU 02-G34 / CE 02-G34 / EP 02-G34) (EU 02-G35 / CE 02-G35 / EP 02-G35) (EU 02-G36 / CE 02-G36 / EP 02-G36) (EU 02-G37 / CE 02-G37 / EP 02-G37) (EU 02-G38 / CE 02-G38 / EP 02-G38) (EU 12-G01 / CE 12-G01 / EP 12-G01) (EU 12-G02 / CE 12-G02 / EP 12-G02) (EU 12-G03 / CE 12-G03 / EP 12-G03) (EU 12-G04 / CE 12-G04 / EP 12-G04) (EU 12-G05 / CE 12-G05 / EP 12-G05) (EU 12-G06 / CE 12-G06 / EP 12-G06)] {(EU / CE 01-LC3, 01-LC4, 01-LC5, 01-LC6, 01-LC9, 01-LC10, 02-LC5, 26-LC6, 26-LC7, 01-LC12], 01-LC13, 01-LC14, 01-LC15, 01-LC16, 01-LC17, 01-LC18, 01-LC19 / EP LCf}, {Coating Operations, consisting of [EP 01-TU1, 01-TU2/ EU 01-TU]; [EP 02-18, 02-19, 02-20, 02-21, 02-22, 02-23, 02-24, 02-25, 02-26, 02-31, 02-61 / EU 02-30. EU 02-31]; [EP / CE / EU 03-03]; [EP 03-06, 03-07, 03-08, 03-15, 03-20, 04-01 / EU 03-04]; [EP 03-21, 03-22, 03-24, 03-25, 03-36, 03-37 /CE 03-21 / EU 03-21]; [EP 03-21, 03-22, 03-24, 03-25 / CE 03-25 / EP 03-25]; EU 03-AMUN; EU 03-AMUS;

EU 03-AMUV; and EU 12-05}; (EU Weld01 / EP Weld01f; EU Weld02 / EP Weld02f; EU Weld03 / EP Weld03f); (EU T-59 / EP T-59); (EU 28-MB / EP 28-MB); (EU 28-C1 / EP 28-C1); (EP WH-01 / EU WH-01); and (EP 03-05 / EU 03-05).

Conditions transfer into the Title V Operating Permit from the following Polk County Air Quality Construction Permits: (PC# 2273 for EU 02-10 / EP 02-P10); (PC# 1827 Modified for EU 02-32 / EP 02-32, 02-37); (PC#2032 Modified for EP 02-35/EU 02-35); [PC # 3259 for (EP 02-38/EU 02-38), (EU 02-39 / EP 02-39), (EU 03-02 / EP 03-02)]; (PC# 2103 Modified for [(EU 02-OX2 / CE 02-OX / EP 02-OXf) (EU 03-OX1 / CE 03-OX / EP 03-OXf)]); (PC# 1825 Modified for EU 03-27/EP 03-27); (PC # 1608 Modified #2 for EU 03-30/EP 03-30 and EU 03-31/EP 03-31); (PC #2088 for EU 11-08 / CE 11-08 / EP 11-08); (PC# 1830 Modified #2 for (EU 11-09 / EP 11-09)(EU 11-10 / EP 11-10, 11-11); (PC# 2334 Modified Modified for [(EU 11-13 / EP 11-13, 11-14)(EU 11-15 / EP 11-15)]); (PC # 2919 Modified for EU 11-20 / CE 11-20 / EP 11-20); (PC #1826 Modified Modified for EU 16-01 / EP 16-01); (PC #1816 Modified Modified for EU 26-01 / CE 26-01 / EP 26-01); (PC #2526 for EU 40-01 / EP 40-01); [Exempt:(EU 2X-Gen / EP 2X-Gen) , (EU 10-Gen / EP 10-Gen) (EU 57-Gen / EP 57-Gen)]; (PC#2527 for EU CT-02 / EP CT-02); {PC#2122 Modified #12 for [(EU 02-G1 / CE 02/G1 / EP 02-G1) (EU 02-G2A, 02-G2B / CE 02-G2 / EP 02-G2) (EU 02-G3B, 02-G3C / CE 02-G3 / EP 02-G3) (EU 02-G8 / CE 02-G8 / EP 02-G8) (EU 02-G9 / CE 02-G9 / EP 02-G9) (EU 02-G10 / CE 02-G10 / EP 02-G10) (EU 02-G11 / CE 02-G11 / EP 02-G11) (EU 02-G12 / CE 02-G12 / EP 02-G12) (EU 02-G13 / CE 02-G13 / EP 02-G13) (EU 02-G17 / CE 02-G17 / EP 02-G17) (EU 02-G18 / CE 02-G18 / EP 02-G18) (EU 02-G19 / CE 02-G19 / EP 02-G19) (EU 02-G20 / CE 02-G20 / EP 02-G20) (EU 02-G21 / CE 02-G21 / EP 02-G21) (EU 02-G24, 02-G25 / CE 02-G24 / EP 02-G24) (EU 02-G26 / CE 02-G26 / EP 02-G26) (EU 02-G27 / CE 02-G27 / EP 02-G27) (EU 02-G28 / CE 02-G28 / EP 02-G28) (EU 02-G29 / CE 02-G29 / EP 02-G29) (EU 02-G30 / CE 02-G30 / EP 02-G30) (EU 02-G31 / CE 02-G31 / EP 02-G31) (EU 02-G32 / CE 02-G32 / EP 02-G32) (EU 02-G33 / CE 02-G33 / EP 02-G33) (EU 02-G34 / CE 02-G34 / EP 02-G34) (EU 02-G35 / CE 02-G35 / EP 02-G35) (EU 02-G36 / CE 02-G36 / EP 02-G36) (EU 02-G37 / CE 02-G37 / EP 02-G37) (EU 02-G38 / CE 02-G38 / EP 02-G38) (EU 12-G01 / CE 12-G01 / EP 12-G01) (EU 12-G02 / CE 12-G02 / EP 12-G02) (EU 12-G03 / CE 12-G03 / EP 12-G03) (EU 12-G04 / CE 12-G04 / EP 12-G04) (EU 12-G05 / CE 12-G05 / EP 12-G05) (EU 12-G06 / CE 12-G06 / EP 12-G06)]}; {PC#2069 Modified #12 for {(EU / CE 01-LC3, 01-LC4, 01-LC5, 01-LC6, 01-LC9, 01-LC10, 02-LC5, 26-LC6, 26-LC7, 01-LC12], 01-LC13, 01-LC14, 01-LC15, 01-LC16, 01-LC17, 01-LC18, 01-LC19 / EP LCf}; {2233 Modified #8 for Coating Operations, consisting of [EP 01-TU1, 01-TU2/ EU 01-TU]; [EP 02-18, 02-19, 02-20, 02-21, 02-22, 02-23, 02-24, 02-25, 02-26, 02-31, 02-61 / EU 02-30. EU 02-31]; [EP / CE / EU 03-03]; [EP 03-06, 03-07, 03-08, 03-15, 03-20, 04-01 / EU 03-04]; [EP 03-21, 03-22, 03-24, 03-25, 03-36, 03-37 /CE 03-21 / EU 03-21]; [EP 03-21, 03-22, 03-24, 03-25 / CE 03-25 / EP 03-25]; EU 03-AMUN; EU 03-AMUS; EU 03-AMUV; and EU 12-05}; (PC #2596 Modified for (EU Weld01 / EP Weld01f, EU Weld02 / EP Weld02f, EU Weld03 / EP Weld03f)); (Exempt: (EU T-59 / EP T-59); (PC #2867 for (EU 28-MB / EP 28-MB)); (PC #2868 Modified Modified for (EU 28-C1 / EP 28-C1)); (PC # 3547 for EP / EU WH-01); and (PC #3788) for (EP / EU 03-05).

The following emission units are insignificant per 567IAC24.103:

Insignificant Activities Equipment List

Insignificant Emission Unit Number	Insignificant Emission Unit Description
11-16	Resin Mixing Unit
16-TK1	Fire Pump Diesel Tank - 300 gallons
HW-01	Facility Natural Gas Fired Hot Water Heaters- all <10 MMBtu/hr
T-60	B14 Diesel Fuel Storage Tank – 6,000 gallons
T-61	B2G Diesel Fuel Storage Tank – 6,000 gallons
T-62	B2B J-20C Oil Storage Tank – 8,225 gallons
T-63	B2G Antifreeze Storage Tank – 7,050 gallons
T-64	B2G 10W-30 Storage Tank – 8,300 gallons
T-67	B2 Clean Oil Storage Tank – 3,000 gallons
T-68	B2 Dirty Oil Storage Tank – 3,000 gallons
T-69	B2 Humble H46 Storage Tank – 2,800 gallons
T-70	B2 Cutting Oil Storage Tank – 2,800 gallons
T-75	B16 Used Oil Storage Tank #1 – 5,300 gallons
T-76	B16 Used Oil Storage Tank #2 – 5,300 gallons
T-77	B3 Diesel Storage Tank – 8,000 gallons
T-78	B3 J20C Oil Storage Tank - 8,000 gallons
T-79	B3 Antifreeze Storage Tank - 8,000 gallons
T-80	B40 10W30 Oil Storage Tank - 18,600 gallons
T-81	B40 Diesel Storage Tank – 15,200 gallons
T-82	B40 RV Antifreeze Storage Tank – 15,200 gallons
T-83	B40 Antifreeze Storage Tank – 10,000 gallons
12-01	Heat Treat I.Q. Furnace (0.275 MMBtu/hr)

B. Applicable Rules and Regulations:

(EU 02-10 / EP 02-P10) is permitted under PC# 2273. This permit limits : PM / PM_{10} / $PM_{2.5}$ to 0.29 lbs.hr, 1.29 TPY, 0.10 gr/dscf (PM only); opacity to <20%; SO_2 to 0.02 lbs/hr, 0.10 TPY, 500 ppmv; NOx to 3.86 lbs./hr, 16.91 TPY; VOC to 0.21 lbs/hr, 0.93 TPY; and CO to 3.24 lbs/hr, 14.21 TPY.

(EU 02-32 / EP 02-32, 02-37) is permitted under PC# 1827 Modified. This permit limits PM / PM_{10} / $PM_{2.5}$ to 0.03 lbs.hr, 0.13 TPY, 0.10 gr/dscf (PM only); opacity to <20%; SO_2 to 0.002 lbs/hr, 0.01 TPY, 500 ppmv; NOx to 0.39 lbs./hr, 1.72 TPY; VOC to 0.02 lbs/hr, 0.09 TPY; and CO to 0.33 lbs/hr, 1.44 TPY.

(EP 02-35/EU 02-35) is permitted under Polk County #2032 Modified. This permit limits PM / PM_{10} / $PM_{2.5}$ to 0.08 lbs.hr, 0.35 TPY, 0.10 gr/dscf (PM only); opacity to <20%; SO_2 to 0.01 lbs/hr, 0.03 TPY, 500 ppmv; NOx to 1.04 lbs./hr, 4.56 TPY; VOC to 0.06 lbs/hr, 0.26 TPY; and CO to 0.87 lbs/hr, 3.81 TPY.

(EP 02-38/EU 02-38) West Boiler is permitted by Polk County # 3259. This permit limits PM / PM_{10} / $PM_{2.5}$ to 0.125 lbs.hr, 0.546 TPY, 0.10 gr/dscf (PM only); opacity to <20%; SO_2 to 0.010 lbs/hr, 0.043 TPY, 500 ppmv; NOx to 1.641 lbs./hr, 7.187 TPY; VOC to 0.090 lbs/hr, 0.395 TPY; and CO to 1.378 lbs/hr, 6.037 TPY.

(EU 02-39 / EP 02-39) East Boiler is permitted by Polk County # 3259. This permit limits PM / PM_{10} / $PM_{2.5}$ to 0.125 lbs.hr, 0.546 TPY, 0.10 gr/dscf (PM only); opacity to <20%; SO_2 to 0.010 lbs/hr, 0.043 TPY, 500 ppmv; NOx to 1.641 lbs./hr, 7.187 TPY; VOC to 0.090 lbs/hr, 0.395 TPY; and CO to 1.378 lbs/hr, 6.037 TPY.

(EU 03-02 / EP 03-02)- Cleaver Brooks BLD 3 Steam Boiler (300 bhp; 12.554 MMBtu/hr) combusting Natural Gas is permitted by Polk County # 3259. This permit limits PM / PM_{10} / $PM_{2.5}$ to 0.094 lbs.hr, 0.410 TPY, 0.10 gr/dscf (PM only); opacity to <20%; SO_2 to 0.007 lbs/hr, 0.032 TPY, 500 ppmv; NOx to 1.231 lbs./hr, 5.391 TPY; VOC to 0.068 lbs/hr, 0.296 TPY; and CO to 1.034 lbs/hr, 4.528 TPY.

[(EU 02-OX2 / CE 02-OX / EP 02-OXf) and (EU 03-OX1 / CE 03-OX / EP 03-OXf)] is permitted by Polk County # 2103 Modified. This permit limits PM / PM_{10} to 0.10 lbs.hr, 0.44 TPY, 0.05 gr/dscf, (each EP).

(EU 03-27/EP 03-27) George Koch & Sons 4 MMBtu/hr Washer Dry Off Oven is permitted by Polk County # 1825 Modified. This permit limits PM / PM_{10} / $PM_{2.5}$ to 0.03 lbs.hr, 0.13 TPY, 0.10 gr/dscf (PM only); opacity to <20%; SO_2 to 0.002 lbs/hr, 0.01 TPY, 500 ppmv; NOx to 0.39 lbs./hr, 1.72 TPY; VOC to 0.02 lbs/hr, 0.09 TPY; and CO to 0.33 lbs/hr, 1.44 TPY.

Polk County Air Quality Construction Permit #1608 Modified #2 for (EU 03-30 / EP 03-30) – Immersol Jet Burner: Washer- Heat Stage 1B. This permit requires emission limits for PM / PM_{10} / $PM_{2.5}$ to 0.03 lbs.hr, 0.13 TPY, 0.10 gr/dscf (PM only); opacity to <20%; SO_2 to 0.002 lbs/hr, 0.01 TPY, 500 ppmv; NOx to 0.35 lbs./hr, 1.53 TPY; VOC to 0.02 lbs/hr, 0.09 TPY; and CO to 0.30 lbs/hr, 1.31TPY.

Polk County Air Quality Construction Permit #1608 Modified #2 for (EU 03-31 / EP 03-31) – Immersol Jet Burner: Washer- Heat Stage 1A. This permit requires emission limits for PM / PM_{10} / $PM_{2.5}$ to 0.03 lbs.hr, 0.13 TPY, 0.10 gr/dscf (PM only); opacity to <20%; SO_2 to 0.002 lbs/hr, 0.01 TPY, 500 ppmv; NOx to 0.35 lbs./hr, 1.53 TPY; VOC to 0.02 lbs/hr, 0.09 TPY; and CO to 0.30 lbs/hr, 1.31TPY.

Polk County Air Quality Construction Permit # 2088 for (EU 11-08 / CE 11-08 / EP 11-08)- Centro Plastic Storage Silo, with Camcorp Model 3125 Silo Bin Vent Dust Collector. This permit requires emission limits for PM/ PM_{10} to 0.09 lbs.hr, 0.38 TPY, 0.01 gr/dscf; and opacity to <20%.

Polk County Air Quality Construction Permit #1830 Modified #2 for (EU 11-09 / EP 11-09) – Rotational Engineering Model CH130 4.5 MMBtu/hr Rotomold Oven combusting Natural Gas. This permit limits PM / PM_{10} to 0.15 TPY, 0.10 gr/dscf (PM only); opacity to <20%; SO_2 to 0.01 TPY, 500 ppmv; NOx to 1.93 TPY; VOC to 0.11 TPY; CO to 1.62 TPY; Single HAP to 0.04 TPY; and Total HAP to 0.04 TPY.

Polk County Air Quality Construction Permit #1830 Modified #2 for (EU 11-10 / EP 11-10, & 11-11) – Rotational Engineering Model CH130, 700 lb/hr Rotomold Cooling Machine. This permit limits PM / PM_{10} to 0.74 TPY, 0.10 gr/dscf (PM only); opacity to <20%; VOC to 0.48 TPY; Single HAP to 0.03 TPY; and Total HAP to 0.05 TPY.

Polk County Air Quality Construction Permit # 2334 Modified for

- 500 lb/hr Pre-cool and Cooling Chambers [(EU 11-13 / EP 11-13). This EU is subject to: PM / PM10 to 0.53 TPY, 0.10 gr/dscf (PM only); opacity to <20%; VOC to 0.34 TPY; Single HAP to 0.02 TPY; and Total HAP to 0.04 TPY.
- Rotational Engineering Inc. Ovenpak Rotomold Natural Gas Fired Oven with LE burners 4.5 MMBtu/hr, (EU 11-13 / EPs 11-14, 11-15). This EU is subject to: PM / PM10 / PM2.5 to 0.15 TPY, 0.10 gr/dscf (PM only); opacity to <20%; SO_2 to 0.01 TPY, 500 ppmv; NOx to 1.93 TPY; VOC to 0.11 TPY; CO to 1.62 TPY; Single HAP to 0.04 TPY; and Total HAP to 0.04 TPY.

Polk County # 2919 Modified for (EU 11-20 / CE 11-20 / EP 11-20) - ALLtra Corporation Plasma Cutter with Water Table. This permit limits PM / PM_{10} to 0.84 lbs.hr, 3.68 TPY, 0.05 gr/dscf (PM only); Single HAP to 0.016 lb/hr, 0.070 TPY; and Total HAP to 0.019 lb/hr, 0.083 TPY.

(EU 16-01/EP 16-01) is permitted by Polk County # 1826 Modified for the Building 16 Diesel Fire Pump with John Deere Co. 6068HF120 engine. This permit limits PM to 0.1 gr/dscf; opacity to <20%; SO_2 to 0.5 lb/MMBtu. Facility shall comply with all applicable conditions of 40 CFR Part 63 Subpart ZZZZ. The owner or operator shall operate EU 16-01 in a manner consistent with the definition of an emergency RICE per §63.6590(a)(1)(iii).

Polk County Air Quality Construction Permit #1816 Modified for (EU 26-01 / CE 26-01 / EP 26-01)- Wheelabrator Shot Blast (EU 26-01), with Camfil Gold Series X-Flo Dust Collector (CE 26-01). This permit limits PM/ PM_{10} to 0.43 lbs.hr, 1.88 TPY, 0.05 gr/dscf; opacity to <20%.

Polk County Air Quality Construction Permit #2526 for (EU 40-01 / EP 40-01)- Kohler 133 Bhp, diesel fired, Emergency Generator. This permit limits PM/ PM_{10} to 0.26 lbs.hr, 0.07 TPY, 1.2 gram/ kW-hr; opacity to <20%; SO_2 to 0.27 lbs.hr, 0.07 TPY, 0.5 gram/ kW-hr; NMHC + NOx to 1.44 lbs./hr, 0.36 TPY, 6.6 gram/ kW-hr; and CO to 0.89 lbs/hr, 0.22 TPY. EU 40-01 is subject to 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ. Applicable requirements from these subparts have been placed into PC #2526 and transferred into the Title V Permit. NSPS 60 Subpart IIII requirements changed from what was placed in PC #2526. The new requirements have been placed in the Title V permit, instead of the original requirements.

(EU 2X-Gen / EP 2X-Gen: 7083 B2X Back-up Generator – 0.068 mmBtu/hr (20 kw) (26.8 HP)), (EU 10-Gen / EP 10-Gen: 7705 B10 Back-up Generator for Lift Stations- 0.167 mmBtu/hr (51 kw) (68.4 HP)), (EU 57-Gen / EP 57-Gen: 7201 B57 Back-up Generator– 0.082 mmBtu/hr (24 kw) (32.2 HP)) were applied for as insignificant in the R1 application. It was determined that are subject to NESHAP Subpart ZZZZ and are therefore significant. They have been placed into the Title V permit with applicable NESHAP Subpart ZZZZ requirements. These units are exempt from Polk County Construction Permit requirement by Chapter V, Article X, Division 1, ¶5-33 (18).

Polk County Air Quality Construction Permit #2527 for (EU CT-02 / EP CT-02)- Marley Model AQ495M1SAF Cooling Tower. This permit limits PM to 0.01 lbs.hr, 0.04 TPY, 0.10 gr/dscf; PM_{10} to 0.01 lbs.hr, 0.04 TPY; opacity to <20%.

Polk County Air Quality Construction Permit #2122 Modified #12 for [Emission Point ID Number: 02-G1, 02-G2, 02-G3, 02-G8, 02-G9, 02-G10, 02-G11, 02-G12, 02-G13, 02-G17, 02-G18, 02-G19, 02-G20, 02-G21, 02-G24, 02-G26, 02-G27, 02-G28, 02-G29, 02-G30, 02-G31, 02-G32, 02-G33, 02-G34, 02-G35, 02-G36, 02-G37, 02-G38, 12-G01, 12-G02, 12-G03, 12-G04, 12-G05, and 12-G06]. This permit limits the following:

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

The emissions from these emission units shall not exceed the levels specified below.

Pollutant	EP	lb/hr[i]	tons/yr[ii]	Other Limits
Particulate Matter (PM)	See footnote[iii]	NA	NA	0.10 gr/dscf
– State	See footnote[iv]	NA	NA	0.05 gr/dscf
PM_{10}	See footnote[v]	0.56	NA	NA
$PM_{2.5}$		0.56	NA	NA
Opacity	See footnote[3,4]	NA	NA	<20%[vi, vii]

[1] The emission limit is expressed as the average of three runs.

[1] The emission limit is based on a twelve (12)-month rolling total.

[1] The emission limit is for the following emission point that processes plastic: 02-G1.

[1] The emission limit is for each of the following emission points that process metal, individually not combined: 02-G2, 02-G3, 02-G8, 02-G9, 02-G10, 02-G11, 02-G12, 02-G13, 02-G17, 02-G18, 02-G19, 02-G20, 02-G21, 02-G24, 02-G26, 02-G27, 02-G28, 02-G29, 02-G30, 02-G31, 02-G32, 02-G33, 02-G34, 02-G35, 02-G36, 02-G37, 02-G38, 12-G01, 12-G02, 12-G03, 12-G04, 12-G05, 12-G06.

[1] The emission limits are for the following emission points combined: 02-G1, 02-G2, 02-G3, 02-G8, 02-G9, 02-G10, 02-G11, 02-G12, 02-G13, 02-G17, 02-G18, 02-G19, 02-G20, 02-G21, 02-G24, 02-G26, 02-G27, 02-G28, 02-G29, 02-G30, 02-G31, 02-G32, 02-G33, 02-G34, 02-G35, 02-G36, 02-G37, 02-G38, 12-G01, 12-G02, 12-G03, 12-G04, 12-G05, 12-G06.

[1] The emission limit is based on a six (6)-minute average.

[1] An exceedance of the opacity limit 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 Local Program may require additional proof to demonstrate compliance (e.g., stack testing).

PC#2069 Modified #12 for {[(EU / CE 01-LC3, 01-LC4, 01-LC5, 01-LC6, 01-LC9, 01-LC10, 02-LC5, 26-LC6, 26-LC7, 01-LC12, 01-LC13, 01-LC14, 01-LC15, 01-LC16, 01-LC17, 01-LC18, 01-LC19] / EP LCf}- seventeen (17) Laser Cutters. This permit limits PM to 0.05 gr/dscf; opacity to <20%.

Polk County Air Quality Construction Permit #2233 Modified #8 for Coating Operations, consisting of (EU 01-TU, 02-30, 02-31, 03-03, 03-04, 03-21, 03-25, 03-AMUN, 03-AMUS, 03-AMUV, and 12-05).

Emission limits are as follows:
The following emission limits shall not be exceeded for Coating Operations Consisting of emission units: 01-TU, 02-30, 03-03, 03-04, 03-21, 12-05

Emission Limits for Coating Operations

EP	Pollutant	lb/hr[viii]	tons/yr[ix]	Other Limits	Reference/Basis
01-TU1 01-TU2	Particulate Matter (PM) – State	NA	NA	0.01 gr/dscf	PCBHRR Chapter V Article VI, Section 5-16(1)
		0.36[5,6,7]	NA	NA	NA
	Opacity	NA	NA	<20%[x, xi]	
03-03	Particulate Matter (PM) – State	NA	NA	0.01 gr/dscf	PCBHRR Chapter V Article VI, Section 5-16(1)
		0.28[5,6]	NA	NA	NA
	Opacity	NA	NA	<20%[3,4]	
03-21 03-22 03-24 03-25	Particulate Matter (PM) – State	NA	NA	0.01 gr/dscf	PCBHRR Chapter V Article VI, Section 5-16(1)
		5.15[5,6,8]	NA	NA	NA
	Opacity	NA	NA	<20%[3,4]	
12-05	Particulate Matter (PM) – State	NA	NA	0.01 gr/dscf	PCBHRR Chapter V Article VI, Section 5-16(1)
	Opacity	NA	NA	<20%[3, 4]	
See footnote 9	Volatile Organic Compounds (VOC)	NA	220.0[10]	NA	PSD Synthetic Minor
	Single HAP	NA	6.0[10]	NA	NESHAP Area Source
	Total HAP	NA	15.0[10]	NA	NESHAP Area Source

[1] The emission limit is expressed as the average of three runs.
[2]The emission limit is based on a twelve (12)-month rolling total.
[3] The emission limit is based on a six (6)-minute average.
[4]An exceedance of the indicator opacity of 10% 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 Local Program may require additional proof to demonstrate compliance (e.g., stack testing).
[5] PM_{10} emissions and $PM_{2.5}$ emissions are equal to PM emissions.
[6] Emission limit set to lower PTE below modeling significance levels.
[7] Emission limit is a combined limit for EP 01-TU1 and -TU2.
[8] Emission limit is a combined limit for EP 03-21, 03-22, 03-24 and 03-25.
[9] The emission limit is a combined limit for the following emission points: 01-TU1, 01-TU2, 02-18,

02-19, 02-20, 02-21, 02-22, 02-23, 02-24, 02-25, 02-26, 02-31, 02-61, 03-03, 03-06, 03-07, 03-08, 03-15, 03-20, 03-21, 03-21, 03-22, 03-24, 03-25, 03-36, 03-37, 04-01, and 12-05.

[10] The emission limit is a combined limit for all non-combustion emission units associated with coating operations.

Authority for Requirement: Polk County AQD Construction Permit #2233 Modified #8

Emission Limits for Natural Gas Combustion Sources[(1)]:

Pollutant: Opacity
Emission Limit: <20%
Authority for Requirement: Polk County AQD Construction Permit #2233 Modified #8

Pollutant: Particulate Matter (PM)
Emission Limits: 0.10 gr/dscf
Authority for Requirement: 567 IAC 23.3(2) "a"
Polk County Board of Health Rules and Regulations Chapter V, Article VI, Section 5-14(3)
Polk County AQD Construction Permit #2233 Modified #8

Pollutant: Sulfur Dioxide (SO_2)
Emission Limits: 500 ppmv
Authority for Requirement: 567 IAC 23.3(3) "e"
Polk County Board of Health Rules and Regulations Chapter V, Article IX, Section 5-27(5)
Polk County AQD Construction Permit #2233 Modified #8

[(1)]Emission limits are for each emission unit listed (02-31, 03-25, 03-AMUN, 03-AMUS, 03-AMUV) individually, not combined.

PC #2596 Modified for (EU Weld01 / EP Weld01f, EU Weld02 / EP Weld02f, EU Weld03 / EP Weld03f) Production Welding. Limits are:
The following emission limits shall not be exceeded for EU Weld01 / EP Weld01f:

Pollutant	**lb/hr**	**[4]tons/yr**	**Additional Limits: Opacity, Allowable Concentration**	**Reference**
Particulate Matter (PM)	- - -	7.28	0.10 gr/dscf	Chapter V, Article VI, Section 5-14
Particulate Matter (PM_{10})	- - -	7.28		
Particulate Matter ($PM_{2.5}$)	- - -	7.28		

Authority for Requirement: Polk County AQD Construction Permit #2596 Modified

The following emission limits shall not be exceeded for EU Weld02 / EP Weld02f:

Pollutant	**lb/hr**	**[4]tons/yr**	**Additional Limits: Opacity, Allowable Concentration**	**Reference**
Particulate Matter (PM)	- - -	0.05	0.10 gr/dscf	Chapter V, Article VI, Section 5-14
Particulate Matter (PM_{10})	- - -	0.05		
Particulate Matter ($PM_{2.5}$)	- - -	0.05		

Authority for Requirement: Polk County AQD Construction Permit #2596 Modified

The following emission limits shall not be exceeded for EU Weld03 / EP Weld03f:

Pollutant	**lb/hr**	**[4]tons/yr**	**Additional Limits: Opacity, Allowable Concentration**	**Reference**
Particulate Matter (PM)	- - -	0.26	0.10 gr/dscf	Chapter V, Article VI, Section 5-14
Particulate Matter (PM_{10})	- - -	0.26		
Particulate Matter ($PM_{2.5}$)	- - -	0.26		

Authority for Requirement: Polk County AQD Construction Permit #2596 Modified

(EU T-59 / EP T-59) B14 Unleaded Gas Storage Tank – 6,000 gallons was applied for as insignificant. It was determined that it is subject to NESHAP Subpart CCCCCC and is therefore significant. It has been placed into the Title V permit with applicable NESHAP Subpart CCCCCC requirements.

(EU 28-MB / EP 28-MB)- EcoQuip Media Blast is permitted by Polk County # 2867. This permit limits PM to 5.70 lbs./hr, 1.48 TPY; PM_{10} to 0.80 lbs/hr, 0.21 TPY; $PM_{2.5}$ to 0.10 lbs./hr, 0.03 TPY; opacity to <20%.

(EU 28-C1 / EP 28-C1)- Kubota Model 3800 Diesel Fired non-emergency Engine/Compressor is permitted by Polk County #2868 Modified Modified. This permit has the following limits:

Pollutant	**tons/yr**	**Additional Limits: Opacity, Allowable Concentration**	**Reference**
[3]Particulate Matter (PM)	0.54	0.10 gr/dscf	Chapter V, Article VI, Section 5-14(b)
[3]Particulate Matter (PM_{10})	0.54		
[1]Opacity	- - -	<20%	Chapter V, Article IV, Section 5-9
[5]Sulfur Dioxide (SO_2)	0.01	0.5 lb/MMBtu	Chapter V, Article IX, Section 5-27(2)(b)

[3]Nitrogen Oxides (NO_x)	4.20		
[6]Volatile Organic Compound (VOC)	0.42		
[4]Carbon Monoxide (CO)	3.57	5.0 gram/kW-hr	40 CFR 1039 Appendix I
[2,7](Total HAP)	0.01		

The engine/ compressor is subject to 40 CFR 60 Subpart IIII-Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and 40 CFR 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. Applicable requirements from these are found in PC #2868 Modified and have been transferred into the Title V permit.

(EU WH-01 / EP WH-01)- Kohler Model 400 REZXD Emergency Generator with Doosan Model D219L Natural Gas Engine is permitted by Polk County #3547. This permit has the following limits:

Pollutant	**lb/hr**	**[4]tons/yr**	**Additional Limits: Opacity, Allowable Concentration**
Particulate Matter (PM)	0.10	0.03	0.10 gr/dscf
Particulate Matter (PM_{10})	0.10	0.03	
Particulate Matter ($PM_{2.5}$)			
[1]Opacity	- - -	- - -	< 20%
Sulfur Dioxide (SO_2)	- - -	0.001	500 ppmv
Nitrogen Oxides (NO_x)	2.69	0.68	1.0 gram/HP-hr
Volatile Organic Compound (VOC)	0.15	0.04	0.7 gram/HP-hr
Carbon Monoxide (CO)	4.35	1.09	2.0 gram/HP-hr

The engine/ compressor is subject to 40 CFR 60 Subpart I JJJJ-Standards of Performance for Stationary Spark Ignition Internal Combustion Engines and 40 CFR 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. Applicable requirements from these are found in PC #3547 and have been transferred into the Title V permit.

(EU 03-05 / EP 03-05)- Hurst Welding & Boiler Co. Series 500 Natural Gas Boiler is permitted by Polk County #3788. This permit has the following limits:

Pollutant	**tons/yr**	**Additional Limits: Opacity, Allowable Concentration**	**Reference**
[4]Particulate Matter (PM)	0.33	0.10 gr/dscf	Chapter V, Article VI, Section 5-14(b)
[4]Particulate Matter (PM_{10})	0.33		
[1]Opacity	- - -	< 20%	Chapter V, Article IV, Section 5-9
[4]Sulfur Dioxide (SO_2)	0.03	500 ppmv (Nat. gas)	Chapter V, Article IX, Section 5-27 (5)
[5]Nitrogen Oxides (NO_x)	4.83		
[4]Volatile Organic Compound (VOC)	0.24		
[4]Carbon Monoxide (CO)	3.62		

The Natural Gas Boiler is subject to 40 CFR 60 Subpart Dc-Standards of Performance for Small, Industrial-Commercial-Institutional Steam Generating Units. Applicable requirements from Subpart Dc are found in PC #3788 and have been transferred into the Title V permit.

NESHAP:

40 CFR 63 – Subpart WWWWWW [Not subject]

National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations. All sources of this type at the facility have been removed. The source is not subject to this subpart.

40 CFR 63 – Subpart MMMM [Not subject]

Emission standards for hazardous air pollutants for surface coating of miscellaneous metal parts and products. These standards apply to miscellaneous metal parts and products surface coating facilities that are a major source, are located at a major source, or are part of a major source of hazardous air pollutant emissions. A miscellaneous metal parts and products surface coating facility that is located at an area source is not subject to this standard. The Coating Operations HAP limit is 6.0 TPY (any single HAP), 15.0 TPY (all HAPs combined) by Polk County AQD Permit #2233 Modified #8. For an existing affected source, the compliance date is the date 3 years after January 2, 2004. The facility was subject to the "Once in, always in" policy and was previously subject to NESHAP MMMM.

EPA policy allowed for getting out of the "Once in, always in" policy of NESHAP MMMM, if the facility requests this in writing. The facility requested to get out of NESHAP MMMM, and they were allowed to get removed from being subject through Polk County AQD Permit #2233 Modified #8, issued 1/24/2024.

40 CFR 63 – Subpart HHHHHH [Not subject]

National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. The facility is not subject to NESHAP HHHHHH, Miscellaneous Surface Coating NESHAP for minor sources, because their paints do not contain any of the target HAPs of Subpart HHHHHH.

40 CFR 63 – Subpart XXXXXX [Not subject]

National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories. This facility's NAICS code, as indicated on their application forms is 333111 (Farm Machinery and Equipment Manufacturing). This is not a regulated category in this subpart. Also, the manufacturing of agricultural equipment is not described in Table 1 of Subpart XXXXXX. Therefore, according to 40 CFR 63.11514(a), this subpart does not apply to this facility.

40 CFR 63 – Subpart PPPPP [Not subject]

Not applicable. Emission standards for hazardous air pollutants: engine test cells/stands. This standard applies to an engine test cell/stand that is located at a major source of HAP emissions. The Facility's HAP PTE is 15.66 TPY (all HAPs combined). Subpart PPPPP definition of an *Engine*

Test Cell/Stand means any apparatus used for testing uninstalled stationary or uninstalled mobile (motive) engines. The facility does not test any uninstalled engines, since the engines have already been tested prior to arriving at John Deere Des Moines. The engines are only operated after being installed on the tractor equipment, in order to test the hydraulics and operability of the tractor.

40 CFR 63- Subpart ZZZZ

For *Emergency Stationary RICE with a site rating of less than or equal to 500 HP which are located at either an area or major HAP source*, Subpart ZZZZ is applicable in the following manner:

- The standards for new RICE apply if the unit commenced construction on or after June 12, 2006.
- <500 Bhp 4Z compliance date is 5/3/2013.

- (EU 16-01/EP 16-01)- Building 16 Diesel Fire Pump with John Deere Co. 6068HF120 engine is permitted by Polk County 1826 Modified. This permit contains the following requirements: Facility shall comply with all applicable conditions of 40 CFR Part 63 Subpart ZZZZ. The owner or operator shall operate EU 16-01 in a manner consistent with the definition of an emergency RICE per §63.6675. Applicable requirements from this subpart have been placed into PC #1826 Modified and transferred into the Title V Permit. (PC #1826 Modified issued 1/27/2025). NESHAP ZZZZ requires that the generator comply with NSPS IIII, in order to fulfill compliance with NESHAP ZZZZ.

- (EU 40-01 / EP 40-01) - Kohler 133 Bhp, diesel fired, emergency generator is permitted by Polk County #2526 and is subject to 40 CFR 63 Subpart ZZZZ. Applicable requirements from this subpart have been placed into PC #2526 and transferred into the Title V Permit. (PC #2526 issued 12/17/2012). The standards for existing RICE apply if the unit commenced construction before June 12, 2006.

- (EU 2X-Gen / EP 2X-Gen) is [20 kW (26.8 HP); Installed 3/30/1995; natural gas fired; major SI< 500 HP compliance date is 10/19/2013; HAP synthetic minor date is 4/24/2013; ∴this is an area existing source not subject to NSPS JJJJ. NESHAP ZZZZ requirements have been placed into the Title V permit.

- (EU 10-Gen / EP 10-Gen) is [51 kW (68.4 HP); Installed 10/28/2005; natural gas fired; major SI< 500 HP compliance date is 10/19/2013; HAP synthetic minor date is 4/24/2013; ∴this is an area existing source not subject to NSPS JJJJ. NESHAP ZZZZ requirements have been placed into the Title V permit.

- (EU 57-Gen / EP 57-Gen) is [24 kW (32.2 HP); Installed 8/14/1996; natural gas fired; major SI< 500 HP compliance date is 10/19/2013; HAP synthetic minor date is 4/24/2013; ∴this is an area existing source not subject to NSPS JJJJ. NESHAP ZZZZ requirements have been placed into the Title V permit.

- (EU 28-C1 / EP 28-C1)- Kubota Model 3800 Diesel Fired non-emergency Engine/Compressor is permitted by Polk County #2868 Modified and is subject to 40 CFR 63 Subpart ZZZZ. Applicable requirements from this subpart have been placed into PC #2868 Modified and transferred into the Title V Permit. NESHAP ZZZZ requires that the generator comply with NSPS IIII, in order to fulfill compliance with NESHAP ZZZZ.
- (EU WH-01 / EP WH-01)- Kohler Model 400 REZXD Emergency Generator with Doosan Model D219L Natural Gas Engine is permitted by Polk County #3547 and is subject to 40 CFR 63 Subpart ZZZZ. Applicable requirements from this subpart have been placed into PC #3547 and transferred into the Title V Permit. NESHAP ZZZZ requires that the generator comply with NSPS JJJJ, in order to fulfill compliance with NESHAP ZZZZ.

40 CFR 63 Subpart ZZZZ, 40 CFR 60 Subpart IIII, and 40 CFR 60 Subpart JJJJ web links are placed into Appendix 1 of the Title V permit.

<u>40 CFR 63 Subpart DDDDD- [Not subject]</u>
National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.

An existing process heater/ boiler is one which was built or installed before 6/4/2010. These have a compliance date of 1/31/2016. A new process heater/ boiler is one built or installed 6/4/2010 or after, and these have a compliance date of 1/31/2013. John Deere was HAP major until 4/24/2013, when it took HAP synthetic minor limits, (9.4 TPY (single HAP) and 24.4 TPY (combined HAP).

- (EU 02-35 /EP 02-35) is not subject to Subpart DDDDD. It was installed in June 2008 and is an existing process heater, and not subject to once in/ always in, since the HAP synthetic minor limitations were taken before the compliance date (1/16/2016).
- (EU 02-38 / EP 02-38) is not subject to Subpart DDDDD. It was installed in 1970 and is an existing 400 Bhp boiler, and not subject to once in/ always in, since the HAP synthetic minor limitations were taken before the compliance date (1/16/2016).
- (EU 02-39 / EP 02-39) is not subject to Subpart DDDDD. It was installed in 1970 and is an existing 400 Bhp boiler, and not subject to once in/ always in, since the HAP synthetic minor limitations were taken before the compliance date (1/16/2016).
- (EU 03-02 / EP 03-02) is not subject to Subpart DDDDD. It was installed in 1970, modified in 1977, and is an existing 300 Bhp boiler, not subject to once in/ always in, since the HAP synthetic minor limitations were taken before the compliance date (1/16/2016).

<u>40 CFR 63 Subpart JJJJJJ [Not subject]</u>

Per 63.11195 gas (only) boilers are not subject to Subpart 6J. John Deere's boilers are natural gas fired, and hence not subject to 6J.

<u>40 CFR 63 Subpart CCCCCC</u>

(EU T-59 / EP T-59) B14 Unleaded Gas Storage Tank – 6,000 gallons

This unit is subject to 40 CFR Part 63 Subpart CCCCCC [National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities, 40 CFR §63.11110 – 40 CFR §63.11132].

This unit has a monthly throughput of less than 10,000 gallons. Per Sec. 63.11111(b), if a Gasoline Dispensing Facility (GDF) has a monthly throughput of less than 10,000 gallons of gasoline, the facility must comply with the requirements of Sec. 63.11116.

Subpart CCCCCC web link is placed into Appendix 1 of the Title V permit.

NSPS:

NSPS Subpart IIII

(EU 40-01 / EP 40-01) [133 HP, installed 12/17/2012, diesel fired, major compliance date 12/17/2012, major new emergency CI < 500 HP] is permitted by Polk County #2526 and is subject to 40 CFR 60 Subpart IIII. Applicable requirements from this subpart have been placed into PC #2526 and transferred into the Title V Permit. NSPS Subpart IIII web link is placed into Appendix 1 of the Title V permit. The generator was built during a timeframe when EPA allowed emission limits to be complied with taken from §89.112, (Table 2, Family of Generators). This satisfies and fulfills NSPS Subpart IIII emission limit requirements.

(EU 16-01 / EP 16-01) is not an affected source for NSPS IIII, per Table 3 to Subpart IIII of Part 60—Certification Requirements for Stationary Fire Pump Engines. It was installed 6/17/2006, and is sized at 240 BHP. Table 3 states that fire pumps of this size, model year 2009 or newer, must comply according to §60.4202(d).

(EU 28-C1 / EP 28-C1)- Kubota Model 3800 Diesel Fired non-emergency Engine/ Compressor is permitted by Polk County #2868 Modified, issued 6/30/2023 and is subject to 40 CFR 63 Subpart ZZZZ. Applicable requirements from this subpart have been placed into PC #2868 Modified and transferred into the Title V Permit. NESHAP ZZZZ requires that the generator comply with NSPS IIII, in order to fulfill compliance with NESHAP ZZZZ. NSPS IIII applicable requirements from this subpart have been placed into PC #2868 Modified and transferred into the Title V Permit. NSPS Subpart IIII web link is placed into Appendix 1 of the Title V permit.

NSPS Subpart JJJJ

- (EU 2X-Gen / EP 2X-Gen) is [20 kW (26.8 HP); Installed 3/30/1995; natural gas fired; major SI< 500 HP compliance date is 10/19/2013; HAP synthetic minor date is 4/24/2013; ∴this is an area existing source not subject to NSPS JJJJ. NSPS JJJJ requirements have been placed into the Title V permit.

- (EU 10-Gen / EP 10-Gen) is [51 kW (68.4 HP); Installed 10/28/2005; natural gas fired; major SI< 500 HP compliance date is 10/19/2013; HAP synthetic minor date is 4/24/2013; ∴this is an area existing source not subject to NSPS JJJJ. NSPS JJJJ requirements have been placed into the Title V permit.

- (EU 57-Gen / EP 57-Gen) is [24 kW (32.2 HP); Installed 8/14/1996; natural gas fired; major SI< 500 HP compliance date is 10/19/2013; HAP synthetic minor date is 4/24/2013; ∴this is an area existing source not subject to NSPS JJJJ. NSPS JJJJ requirements have been placed into the Title V permit.

- (EU WH-01 / EP WH-01)- Kohler Model 400 REZXD Emergency Generator with Doosan Model D219L Natural Gas Engine is permitted by Polk County #3547 and is subject to 40 CFR 63 Subpart ZZZZ. Applicable requirements from this subpart have been placed into PC #3547 and transferred into the Title V Permit. NESHAP ZZZZ requires that the generator comply with NSPS JJJJ, in order to fulfill compliance with NESHAP ZZZZ.

NSPS Subpart Dc

(EU 03-05 / EP 03-05)- Hurst Welding & Boiler Co. Series 500 Natural Gas Boiler is permitted by Polk County #3788. The Natural Gas Boiler is subject to 40 CFR 60 Subpart Dc-Standards of Performance for Small, Industrial-Commercial-Institutional Steam Generating Units. Applicable requirements from Subpart Dc are found in PC #3788 and have been transferred into the Title V permit.

PSD:
The facility is currently minor for PSD purposes.

Title IV:
Not Applicable.

STRATOSPHERIC OZONE:
The only ozone depleting chemicals regulated by 40 CFR 82, at the facility are those used for the air conditioning.

Monitoring Considerations:

OPACITY:
The numerous particulate sources at this facility have a good record of compliance with controls and good maintenance placed onto the EUs. Opacity has not been historically observed from any of the facility emission points in the past. The facility requested that Method 22 and Method 9 VE checks to not be required because of this historical non-observation of any VEs and added human work hours that would be required in order to do this for no environmental benefit.

EU / EPs subject to <20% opacity that have no requirements due to historical no VEs, subject to NSPS/ NESHAP observed are: (See detailed reason tables justifications starting on page 20.) (EU 11-10 / EP 11-10, 11-11), (EU 11-13 / EP 11-13, 11-14) (EU 16-01 / EP 16-01) (EU 40-01 / EP 40-01) (EU CT-02 / EP CT-02) {EP 01-TU1, 01-TU2, 02-18 thru 02-26, 02-31, 02-61, 03-03, 03-06. 03-07, 03-08, 03-15, 03-20, 03-21, 03-22, 03-24, 03-25, 03-36, 03-37, 04-01, and 12-05} and (EU 28-C1 / EP 28-C1), (EU WH-01 / EP WH-01).

The following emission groups are subject to <20% opacity or no VEs allowed, but the combust natural gas only, opacity is not expected, and checking for VEs will not be required: (EU 02-10 /

EP 02-P10) (EU 02-32 / EP 02-32, 02-37) (EU 02-35 / EP 02-35) (EU 02-38 / EP 02-38) (EU 02-39 / EP 02-39) (EU 03-02 / EP 03-02) (EU 03-27 / EP 03-27) (EU 03-30 / EP 03-30) (EU 03-31 / EP 03-31) (EU 11-08 / CE 11-08 / EP 11-08) (EU 11-09 / EP 11-09), (EU 11-15 / EP 11-15)] (EU 2X-Gen / EP 2X-Gen) (EU 10-Gen / EP 10-Gen) (EU 57-Gen / EP 57-Gen) (EU 03-05 / EP 03-05) [See additional justifications starting on page 20.]

Internally vented or fugitive, and therefore checking for VEs will not be required: (EU 26-01 / CE 26-01 / EP 26-01) [(EU 03-OX1 / CE 03-OX / EP 03-OXf) (EU 02-OX2 / CE 02-OX / EP 02-OXf)]; (EU 11-20 / CE 11-20 / EP 11-20); [Emission Point ID Number: 02-G1, 02-G2, 02-G3, 02-G8, 02-G9, 02-G10, 02-G11, 02-G12, 02-G13, 02-G17, 02-G18, 02-G19, 02-G20, 02-G21, 02-G24, 02-G26, 02-G27, 02-G28, 02-G29, 02-G30, 02-G31, 02-G32, 02-G33, 02-G34, 02-G35, 02-G36, 02-G37, 02-G38, 12-G01, 12-G02, 12-G03, 12-G04, 12-G05, and 12-G06] (EP LCf) (EU Weld01 / EP Weld01f, EU Weld02 / EP Weld02f, EU Weld03 / EP Weld03f)]; (EU 28-MB / EP 28-MB)

CAM & Monitoring Considerations:

(EU 02-10 / EP 02-P10)

(EU 02-10 / EP 02-P10) is permitted under PC# 2273. This permit limits: PM/ PM_{10} / $PM_{2.5}$ to 0.29 lbs.hr, 1.29 TPY, 0.10 gr/dscf (PM only); opacity to <20%; SO_2 to 0.02 lbs/hr, 0.10 TPY, 500 ppmv; NOx to 3.86 lbs./hr, 16.91 TPY; VOC to 0.21 lbs/hr, 0.93 TPY; and CO to 3.24 lbs/hr, 14.21 TPY.

(all pollutants are uncontrolled minor). No additional monitoring is required under DNR Monitoring Guidance Policy. Opacity monitoring is not warranted, since natural gas is not known to produce opacity when combusted. CAM not required.

(EU 02-32 / EP 02-32, 02-37)

(EU 02-32 / EP 02-32, 02-37) is permitted under PC# 1827 Modified. This permit limits PM / PM_{10} / $PM_{2.5}$ to 0.03 lbs.hr, 0.13 TPY, 0.10 gr/dscf (PM only); opacity to <20%; SO_2 to 0.002 lbs/hr, 0.01 TPY, 500 ppmv; NOx to 0.39 lbs./hr, 1.72 TPY; VOC to 0.02 lbs/hr, 0.09 TPY; and CO to 0.33 lbs/hr, 1.44 TPY. (all pollutants are uncontrolled minor). No additional monitoring is required under DNR Monitoring Guidance Policy. Opacity monitoring is not warranted, since natural gas is not known to produce opacity when combusted. CAM not required.

(EP 02-35 / EU 02-35)

(EP 02-35 / EU 02-35) is permitted under Polk County #2032 Modified. This permit limits PM / PM_{10} / $PM_{2.5}$ to 0.08 lbs.hr, 0.35 TPY, 0.10 gr/dscf (PM only); opacity to <20%; SO_2 to 0.01 lbs/hr, 0.03 TPY, 500 ppmv; NOx to 1.04 lbs./hr, 4.56 TPY; VOC to 0.06 lbs/hr, 0.26 TPY; and CO to 0.87 lbs/hr, 3.81 TPY. (all pollutants are uncontrolled minor). No additional monitoring is required under DNR Monitoring Guidance Policy. Opacity monitoring is not warranted, since natural gas is not known to produce opacity when combusted. CAM not required.

(EP02-38/EU 02-38)

West Boiler is permitted by Polk County # 3259. This permit limits PM / PM_{10} / $PM_{2.5}$ to 0.125 lbs.hr, 0.546 TPY, 0.10 gr/dscf (PM only); opacity to <20%; SO_2 to 0.010 lbs/hr, 0.043 TPY, 500 ppmv; NOx to 1.641 lbs./hr, 7.187 TPY; VOC to 0.090 lbs/hr, 0.395 TPY; and CO to 1.378 lbs/hr, 6.037 TPY. (all pollutants are uncontrolled minor). No additional monitoring is required under DNR Monitoring Guidance Policy. Opacity monitoring is not warranted, since natural gas is not known to produce opacity when combusted. CAM not required.

(EU 02-39 / EP 02-39)
East Boiler is permitted by Polk County # 3259. This permit limits PM / PM_{10} / $PM_{2.5}$ to 0.125 lbs.hr, 0.546 TPY, 0.10 gr/dscf (PM only); opacity to <20%; SO_2 to 0.010 lbs/hr, 0.043 TPY, 500 ppmv; NOx to 1.641 lbs./hr, 7.187 TPY; VOC to 0.090 lbs/hr, 0.395 TPY; and CO to 1.378 lbs/hr, 6.037 TPY. (all pollutants are uncontrolled minor). No additional monitoring is required under DNR Monitoring Guidance Policy. Opacity monitoring is not warranted, since natural gas is not known to produce opacity when combusted. CAM not required.

(EU 03-02 / EP 03-02)
Cleaver Brooks BLD 3 Steam Boiler is permitted by Polk County # 3259. This permit limits PM / PM_{10} / $PM_{2.5}$ to 0.094 lbs.hr, 0.410 TPY, 0.10 gr/dscf (PM only); opacity to <20%; SO_2 to 0.007 lbs/hr, 0.032 TPY, 500 ppmv; NOx to 1.231 lbs./hr, 5.391 TPY; VOC to 0.068 lbs/hr, 0.296 TPY; and CO to 1.034 lbs/hr, 4.528 TPY. (all pollutants are uncontrolled minor). No additional monitoring is required under DNR Monitoring Guidance Policy. Opacity monitoring is not warranted, since natural gas is not known to produce opacity when combusted. CAM not required.

(EU 03-OX1 / CE 03-OX / EP 03-OXf)
PM/ PM10 controlled PTE = 0.44 TPY (controlled minor);
PM uncontrolled PTE= (0.44 TPY)(1/1-0.90)= 4.40 TPY PM/PM10 (uncontrolled minor). No tests or O&M Plans are prescribed by DNR Monitoring Guidance Policy. CAM not required. EP is internally vented; therefore no opacity monitoring is warranted.

(EU 02-OX2 / CE 02-OX / EP 02-OXf) and (EU 03-OX1 / CE 03-OX / EP 03-OXf)
PM/ PM10 controlled PTE = 0.44 TPY (controlled minor) (each);
PM uncontrolled PTE= (0.44 TPY)(1/1-0.90)= 4.40 TPY PM/PM10 (uncontrolled minor). No tests or O&M Plans are prescribed by DNR Monitoring Guidance Policy. CAM not required. EP is internally vented; therefore no opacity monitoring is warranted.

(EU 03-27/EP 03-27)
George Koch & Sons 4 MMBtu/hr Washer Dry Off Oven is permitted by Polk County # 1825 Modified. This permit limits PM / PM_{10} / $PM_{2.5}$ to 0.03 lbs.hr, 0.13 TPY, 0.10 gr/dscf (PM only); opacity to <20%; SO_2 to 0.002 lbs/hr, 0.01 TPY, 500 ppmv; NOx to 0.39 lbs./hr, 1.72 TPY; VOC to 0.02 lbs/hr, 0.09 TPY; and CO to 0.33 lbs/hr, 1.44 TPY. (all pollutants are uncontrolled minor). No additional monitoring is required under DNR Monitoring Guidance Policy. Opacity monitoring is not warranted, since natural gas is not known to produce opacity when combusted. CAM not required.

(EU 03-30 / EP 03-30)
Polk County Air Quality Construction Permit #1608 Modified #2 for (EU 03-30 / EP 03-30) – Immersol Jet Burner: Washer- Heat Stage 1B. This permit requires emission limits for PM / PM_{10} / $PM_{2.5}$ to 0.03 lbs.hr, 0.13 TPY, 0.10 gr/dscf (PM only); opacity to <20%; SO_2 to 0.002 lbs/hr, 0.01 TPY, 500 ppmv; NOx to 0.35 lbs./hr, 1.53 TPY; VOC to 0.02 lbs/hr, 0.09 TPY; and CO to 0.30 lbs/hr, 1.31TPY.
(all pollutants are uncontrolled minor). No additional monitoring is required under DNR Monitoring Guidance Policy. Opacity monitoring is not warranted, since natural gas is not known to produce opacity when combusted. CAM not required.

(EU 03-31 / EP 03-31)
Polk County Air Quality Construction Permit #1608 Modified #2 for (EU 03-31 / EP 03-31) – Immersol Jet Burner: Washer- Heat Stage 1A. This permit requires emission limits for PM / PM_{10} / $PM_{2.5}$ to 0.03 lbs.hr, 0.13 TPY, 0.10 gr/dscf (PM only); opacity to <20%; SO_2 to 0.002 lbs/hr, 0.01 TPY, 500 ppmv; NOx to 0.35 lbs./hr, 1.53 TPY; VOC to 0.02 lbs/hr, 0.09 TPY; and CO to 0.30 lbs/hr, 1.31TPY. (all pollutants are uncontrolled minor). No additional monitoring is required under DNR Monitoring Guidance Policy. Opacity monitoring is not warranted, since natural gas is not known to produce opacity when combusted. CAM not required.

(EU 11-08 / CE 11-08 / EP 11-08)
Centro Plastic Storage Silo, with Camcorp Model 3125 Silo Bin Vent Dust Collector is permitted by Polk County Air Quality Construction Permit # 2088. This permit requires emission limits for PM/ PM_{10} to 0.09 lbs.hr, 0.38 TPY, 0.01 gr/dscf; and opacity to <20%. (PM/ PM_{10} controlled minor) Uncontrolled PM/ PM_{10} PTE is 3.8 TPY (uncontrolled minor). No additional monitoring is required under DNR Monitoring Guidance Policy for PM/ PM_{10}. A Facility O&M Plan requirement was requested by the facility. CAM not required.

(EU 11-09 / EP 11-09)
Polk County Air Quality Construction Permit #1830 Modified #2 for (EU 11-09 / EP 11-09) – Rotational Engineering Model CH130 4.5 MMBtu/hr Rotomold Oven combusting Natural Gas. This permit limits PM / PM_{10} to 0.15 TPY, 0.10 gr/dscf (PM only); opacity to <20%; SO_2 to 0.01 TPY, 500 ppmv; NOx to 1.93 TPY; VOC to 0.11 TPY; CO to 1.62 TPY; Single HAP to 0.04 TPY; and Total HAP to 0.04 TPY (all pollutants are uncontrolled minor). No additional monitoring is required under DNR Monitoring Guidance Policy. Opacity monitoring is not warranted, since natural gas is not known to produce opacity when combusted. CAM not required.

(EU 11-10 /EP 11-10, & 11-11)
Polk County Air Quality Construction Permit #1830 Modified #2 for (EU 11-10 / EP 11-10, & 11-11) – Rotational Engineering Model CH130, 700 lb/hr Rotomold Cooling Machine. This permit limits PM / PM_{10} to 0.74 TPY, 0.10 gr/dscf (PM only); opacity to <20%; VOC to 0.48 TPY; Single HAP to 0.03 TPY; and Total HAP to 0.05 TPY (all pollutants are uncontrolled minor). No additional monitoring is required under DNR Monitoring Guidance Policy. CAM not required.

[(EU 11-13 / EP 11-13, 11-14)(EU 11-15 / EP 11-15)]
Polk County Air Quality Construction Permit # 2334 Modified for

- 500 lb/hr Pre-cool and Cooling Chambers [(EU 11-13 / EP 11-13). This EU is subject to: PM / PM10 to 0.53 TPY, 0.10 gr/dscf (PM only); opacity to <20%; VOC to 0.34 TPY; Single HAP to 0.02 TPY; and Total HAP to 0.04 TPY.
- Rotational Engineering Inc. Ovenpak Rotomold Natural Gas Fired Oven with LE burners 4.5 MMBtu/hr, (EU 11-13 / EPs 11-14, 11-15). This EU is subject to: PM / PM10 to 0.15 TPY, 0.10 gr/dscf (PM only); opacity to <20%; SO_2 to 0.01 TPY, 500 ppmv; NOx to 1.93 TPY; VOC to 0.11 TPY; CO to 1.62 TPY; Single HAP to 0.04 TPY; and Total HAP to 0.04 TPY.

(all pollutants are uncontrolled minor). No additional monitoring is required under DNR Monitoring Guidance Policy. Opacity monitoring is not warranted, since natural gas is not known to produce opacity when combusted. CAM not required.

(EU 11-20 / CE 11-20 / EP 11-20)

Polk County # 2919 Modified for (EU 11-20 / CE 11-20 / EP 11-20) - ALLtra Corporation Plasma Cutter with Water Table. This permit limits PM / PM_{10} to 0.84 lbs.hr, 3.68 TPY, 0.05 gr/dscf (PM only); Single HAP to 0.016 lb/hr, 0.070 TPY; and Total HAP to 0.019 lb/hr, 0.083 TPY. (all pollutants are uncontrolled minor). No additional monitoring is required under DNR Monitoring Guidance Policy. Opacity monitoring is not warranted, as the EP is internally vented. CAM not required.

(EU 16-01/EP 16-01)

is permitted by Polk County # 1826 Modified for the Building 16 Diesel Fire Pump with John Deere Co. 6068HF120 engine. This permit limits This permit limits PM to 0.1 gr/dscf; opacity to <20%; SO_2 to 0.5 lb/MMBtu.. (all pollutants are uncontrolled minor). No additional monitoring is required under DNR Monitoring Guidance Policy. Opacity monitoring will not be required, since the unit is an emergency fire pump which would be operated only during a fire or for maintenance purposes and it has not shown opacity when operated. CAM not required, based on PTE and no control equipment.

(EU 40-01 / EP 40-01)

Kohler 133 Bhp, diesel fired, Emergency Generator is permitted by Polk County Air Quality Construction Permit #2526. This permit limits PM/ PM_{10} to 0.26 lbs.hr, 0.07 TPY, 1.2 gram/ kW-hr; opacity to <20%; SO_2 to 0.27 lbs.hr, 0.07 TPY, 0.5 gram/ kW-hr; NMHC + NOx to 1.44 lbs./hr, 0.36 TPY, 6.6 gram/ kW-hr; and CO to 0.89 lbs/hr, 0.22 TPY (all pollutants are uncontrolled minor). EU 40-01 is subject to 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ. Applicable requirements from these subparts have been placed into PC #2526 and transferred into the Title V Permit. Compliance with these subparts ensures sufficient monitoring for this EU. Opacity monitoring will not be required, since the unit is an emergency generator which would be operated only during an emrgency or for maintenance purposes and it has not shown opacity when operated. CAM not required.

(EU 2X-Gen / EP 2x-Gen: 7083 B2X Back-up Generator – 0.068 mmBtu/hr (20 kw) (26.8 HP)), (EU 10-Gen / EP 10-Gen: 7705 B10 Back-up Generator for Lift Stations- 0.167 mmBtu/hr (51 kw) (68.4 HP)), (EU 57-Gen / EP 57-Gen: 7201 B57 Back-up Generator– 0.082 mmBtu/hr (24 kw) (32.2 HP)) were applied for as insignificant in the R1 application. It was determined that are subject to NESHAP Subpart ZZZZ and are therefore significant. They have been placed into the Title V permit with applicable NESHAP Subpart ZZZZ requirements. Each generator has uncontrolled minor PTE for all pollutants, (see PTE spreadsheet). Subpart ZZZZ has monitoring sufficient to ensure compliance with itself. Opacity monitoring is not warranted, since natural gas is not known to produce opacity when combusted. CAM not required.

(EU CT-02 / EP CT-02)

Marley Model AQ495M1SAF Cooling Tower is permitted by Polk County Air Quality Construction Permit #2527. This permit limits PM to 0.01 lbs.hr, 0.04 TPY, 0.10 gr/dscf; PM_{10} to 0.01 lbs.hr, 0.04 TPY; opacity to <20%. (all pollutants are uncontrolled minor). No additional monitoring is required under DNR Monitoring Guidance Policy. Opacity monitoring is not warranted, since it has not historically shown opacity when operated. A Facility O&M Plan will be required in lieu of Opacity Monitoring. CAM not required.

[Emission Point ID Number: 02-G1, 02-G2, 02-G3, 02-G8, 02-G9, 02-G10, 02-G11, 02-G12, 02-G13, 02-G17, 02-G18, 02-G19, 02-G20, 02-G21, 02-G24, 02-G26, 02-G27, 02-G28, 02-G29, 02-

G30, 02-G31, 02-G32, 02-G33, 02-G34, 02-G35, 02-G36, 02-G37, 02-G38, 12-G01, 12-G02, 12-G03, 12-G04, 12-G05, and 12-G06] are permitted by Polk County Air Quality Construction Permit #2122 Modified #12. This permit limits all of these emission group's pollutants to controlled minor and uncontrolled minor. (The largest group is (EU 02-G1 / CE 02-G1 / EP 02-G1) with PM / PM_{10} / $PM_{2.5}$ having controlled minor: 0.44 TPY and uncontrolled minor: 8.8 TPY PTE. No additional monitoring is required under DNR Monitoring Guidance Policy. Opacity monitoring is not warranted, since these emission group's EPs are required to be vented internally. CAM not required.

PC#2069 Modified #12 for {[(EU / CE 01-LC3, 01-LC4, 01-LC5, 01-LC6, 01-LC9, 01-LC10, 02-LC5, 26-LC6, 26-LC7, 01-LC12, 01-LC13, 01-LC14, 01-LC15, 01-LC16, 01-LC17, 01-LC18, 01-LC19] / EP LCf}- seventeen (17) Laser Cutters. This permit limits PM to 0.05 gr/dscf; opacity to <20%. The largest laser cutters in this group has a controlled PM / PM_{10} PTE of 0.44 TPY (controlled minor) and uncontrolled PTE of 4.4 TPY (uncontrolled minor). No additional monitoring is required under DNR Monitoring Guidance Policy. Opacity monitoring is not warranted, since these laser cutters are required to be vented internally. CAM not required.

Coating Operations consisting of (EU 01-TU, 02-30, 02-31, 03-03, 03-04, 03-21, 03-25, 03-AMUN, 03-AMUS, 03-AMUV, and 12-05) is permitted by Polk County Air Quality Construction Permit #2233 Modified #8. Refer to Applicable Rules and Regulations section above, for emission limits assigned to each emission unit by PC # 2233 Modified #8. All EUs have uncontrolled minor PTEs for all pollutants, with the exception of the paint group EUs which have controlled minor / uncontrolled significant PM_{10} PTEs. (15 or 30 TPY PM_{10}). A Facility O&M Plan is suggested under DNR Monitoring Guidance Policy. A CAM Plan has been proposed by the facility and approved. The CAM Plan is used in lieu of a Facility and Agency O&M Plan.

(EU Weld01 / EP Weld01f, EU Weld02 / EP Weld02f, EU Weld03 / EP Weld03f) GMAW/SMAW/FCAW Production Welding is permitted by Polk County Air Quality Construction Permit #2596 Modified. This permit limits PM / PM_{10}/ $PM_{2.5}$ to 7.28 TPY (EP Weld01f), 0.05 TPY (EP Weld02f), and 0.26 TPY (EP Weld03f); 0.10 gr/dscf; (no short term limits) and (all pollutants uncontrolled minor). No additional monitoring is required under DNR Monitoring Guidance Policy. Opacity monitoring is not warranted, since EP Weld01f, Weld 02f, and Weld 03f are required to be vented internally. CAM not required.

(EU T-59 / EP T-59) B14 Unleaded Gas Storage Tank – 6,000 gallons was applied for as insignificant. It was determined that it is subject to NESHAP Subpart CCCCCC and is therefore significant. It has been placed into the Title V permit with applicable NESHAP Subpart CCCCCC requirements. The tank is exempt from Polk County AQD Construction Permitting, and there are no applicable emission limits. Throughput monitoring will ensure compliance with 40 CFR 63 Subpart CCCCCC. CAM not required.

(EU 28-MB / EP 28-MB)- EcoQuip Media Blast is permitted by Polk County # 2867. This permit limits PM to 5.70 lbs./hr, 1.48 TPY; PM_{10} to 0.80 lbs/hr, 0.21 TPY; $PM_{2.5}$ to 0.10 lbs./hr, 0.03 TPY; opacity to <20% (all pollutants uncontrolled minor). No additional monitoring is required under DNR Monitoring Guidance Policy. Opacity monitoring is not warranted, since EP 28-MB is a fugitive emission point. CAM not required.

(EU 28-C1 / EP 28-C1)- Kubota Model 3800 Diesel Fired non-emergency Engine/Compressor is permitted by Polk County # 2868 Modified. This permit limits are:

Pollutant	tons/yr	Additional Limits: Opacity, Allowable Concentration	Reference
[3]Particulate Matter (PM)	0.54	0.10 gr/dscf	Chapter V, Article VI, Section 5-14(b)
[3]Particulate Matter (PM_{10})	0.54		
[1]Opacity	- - -	<20%	Chapter V, Article IV, Section 5-9
[5]Sulfur Dioxide (SO_2)	0.01	0.5 lb/MMBtu	Chapter V, Article IX, Section 5-27(2)(b)
[3]Nitrogen Oxides (NO_x)	4.20		
[6]Volatile Organic Compound (VOC)	0.42		
[4]Carbon Monoxide (CO)	3.57	5.0 gram/kW-hr	40 CFR 1039 Appendix I
[2,7](Total HAP)	0.01		

(all pollutants uncontrolled minor). No additional monitoring is required under DNR Monitoring Guidance Policy. CAM not required.

(EU WH-01 / EP WH-01) has all pollutants uncontrolled minor. No additional monitoring is required under DNR Monitoring Guidance Policy. 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ contain monitoring provisions for this emission unit. CAM not required.

(EU 03-05 / EP 03-05) has all pollutants uncontrolled minor. No additional monitoring is required under DNR Monitoring Guidance Policy. 40 CFR 60 Subpart Dc contains monitoring provisions for this emission unit. CAM not required.

Facility Proposed Limits:

The facility has proposed eliminating Visible Emission (VE) Monitoring, with the following justification. DNR and Polk County AQD agree with their proposal. All VE monitoring indicated in the analysis above is superseded by the justification below.

John Deere Des Moines Works (JDDMW) is proposing eliminating the current monitoring requirements from the Title V Operating Permit as the current requirements are not sustainable. Semi-annual Title V Operating Permit certification reporting under the current permit conditions put JDDMW at risk of noncompliance as each reporting cycle has numerous deviations because No Visible Emissions (NVE) observations were not conducted when the emission unit was operating. In conjunction with the requested modifications to visible emissions observation requirements, JDDMW has reviewed visible emission requirements in other Title V Operating Permits. The permits listed below are associated with John Deere facilities performing similar operations. The permits do not include visible emissions observation requirements; thus supporting JDDMW's request to eliminate the NVE observation requirements from the Title V Operating Permit.

- JD Ottumwa (03-TV-028R3, issued 12/4/2019)
- JD Davenport (01-TV-008R3-M001, issued 6/27/2019)

- JD Dubuque Works (01-TV021R2-M005, issued 3/14/2017)
- JD Waterloo Engine Works TV (04-TV-018R2-M001, issued 7/25/2016)
- JD Waterloo Drivetrain Operations (03-TV-027R2-M001, issued 4/13/2016)
- JD Waterloo – Tractor Cab Assembly Operations (02-TV-024R2-M001, issued 2/6/2018)

The table below provides additional justification for eliminating the NVE observation requirements from the Title V Operating Permit.

Emission Point	01-TU1, 01-TU2	Emission Unit	01-TU	Vehicle Touch-Up Paint Booth
Emission Point	03-03	Emission Unit	03-03	D-20A Touch-Up Paint Booth
Emission Point	02-18 thru 02-26, 02-31, 02-61	Emission Unit	02-30	D-19 E-Coat Dip Tank
			02-31	(5) – 3 MMBtu/hr Drying Burners combusting natural gas
Emission Point		Emission Unit	03-04	D-20A Black Paint Dip Tank

	03-06, 03-07, 03-08, 03-15, 03-20, 04-01		03-AMUV	(1) – 1.944 MMBtu/hr Air Makeup Unit combusting natural gas
Emission Point	03-21, 03-22, 03-24, 03-25, 03-36, 03-37	Emission Unit	03-21	D-20A North and South Paint Booths
Emission Point	12-05	Emission Unit	12-05	D-51 Maintenance Booth
Current Language	Emission Points 01-TU1, 01-TU2, 02-18 thru 02-26, 02-31, 02-61, 03-03, 03-06, 03-07, 03-08, 03-15, 03-20, 04-01, 03-21, 03-22, 03-24, 03-25, 03-36, 03-37, and 12-05 shall be visually checked for observable emissions once every week by a designated observer. The observation shall be taken while the equipment is operating at or near full capacity. The observation shall be noted in a log book, which shall state the date, time, observer's signature, and whether any emissions were observed. If visible emissions are observed, corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity >20% is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits. The log book will be maintained on site for 5 years and be made available to representatives of Polk County AQD upon request.			
Proposed Language	Eliminate the NVE observation requirement.			
Justification	These emissions unit are subject to a NESHAP proposed after 1990 (Subpart MMMM proposed 8/2002) and is therefore exempt from periodic monitoring (DNR Periodic Monitoring Guidance Document Appendix A, page 9). Additionally, Eliminate NVE observations for Touchup Paint Booths (Emission Points 01-TU1, 01-TU2, 12-05, 03-03): These units operate under an agency approved Operation and Maintenance plan. The systems are inspected on a weekly basis and PMs are conducted throughout the year. NVE observation history does not record any observations of opacity for these units. There are numerous examples of Iowa DNR Operating Permits that contain Agency Approved O&M Plans but exclude all VE inspections. Eliminate NVE observations for North and South Paint Booths (Emission Points 03-21, 03-22, 03-24, 03-25, 03-36, 03-37): North and South Paint Booths (EU 03-21, EP 03-21, 03-22, 03-24, 03-25, 03-36, 03-37) operate under a CAM plan that identifies daily pressure			

	drop monitoring and O & M plan to ensure PM control is working as designed with no visible emissions. Eliminate NVE observations for Emission Points 02-18 thru 02-26, 02-31, 02-61, 03-06, 03-07, 03-08, 03-15, 03-20, 04-01, 03-21, 03-22, 03-24, and 03-25: The process emissions that are exhausted through these emission points are not expected to result in opacity. The processes consist of dip tanks and natural gas combustion sources.

Emission Point	11-08	Emission Unit	11-08	Centro Plastic Storage Silo
Current Language	Emission point (11-08) shall be visually checked for observable emissions every time the Centro Plastic Storage Silo (EU 11-08) is filled with polyethylene powder, by a designated observer. The observation shall be taken while the equipment is operating at or near full capacity. The observation shall be noted in a log book, which shall state the date, time, observer's signature, and whether any emissions were observed. If visible emissions are observed, corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity >20% is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits. The log book will be maintained on site for 5 years and be made available to representatives of Polk County AQD upon request.			
Proposed Language	Eliminate the NVE observation requirement.			
Justification	Plastic Storage Silo is filled infrequently. JDDMW proposes a facility O and M plan to ensure no visible emissions.			

Emission Point	11-09, 11-10, 11-11	Emission Unit	11-10	Rotational Engineering Model CH130 Rotomold Machine
Current Language	Emission Points 11-09, 11-10, & 11-11 shall be visually checked for observable emissions once every week by a designated observer. The observation shall be taken while the equipment is operating at or near full capacity. The observation shall be noted in a log book, which shall state the date, time, observer's signature, and whether any emissions were observed. If visible emissions are observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on			

	the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits. The log book will be maintained on site for 5 years and be made available to representatives of Polk County AQD upon request.
Proposed Language	Eliminate the NVE observation requirement.
Justification	This is an emergency use fire pump that operates on an automated schedule without prior notification. As such, it is not possible to perform an NVE observation every time the unit operates. The emission unit is subject to a NESHAP proposed after 1990 (Subpart ZZZZ proposed 12/2002) and is therefore exempt from periodic monitoring (DNR Periodic Monitoring Guidance Document Appendix A, page 9). The NESHAP includes rigorous operation standards.

Emission Point	16-01	Emission Unit	16-01	Building 16 Clarke Model JU6H-UF60 240 Bhp Fire Pump
Current Language	Emission Point 16-01 shall be visually checked for observable emissions once every time the fire pump (EU 16-01) is operated, by a designated observer. The observation shall be taken while the equipment is operating at or near full capacity. The observation shall be noted in a log book, which shall state the date, time, observer's signature, and whether any emissions were observed. If visible emissions are observed, corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity >20% is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits. The log book will be maintained on site for 5 years and be made available to representatives of Polk County AQD upon request.			
Proposed Language	Eliminate the NVE observation requirement.			
Justification	This is an emergency use fire pump that operates on an automated schedule without prior notification. As such, it is not possible to perform an NVE observation every time the unit operates. The emission unit is subject to a NESHAP proposed after 1990 (Subpart ZZZZ proposed 12/2002) and is therefore exempt from periodic monitoring (DNR Periodic Monitoring Guidance Document Appendix A, page 9). The NESHAP includes rigorous operation standards.			

Emission Point	26-01	Emission Unit	26-01	7377 Wheelabrator Shot Blast
Current Language	Emission Point 26-01 shall be visually checked for observable emissions once every week by a designated observer. The observation shall be taken while the equipment is operating at or near full capacity. The observation shall be noted in a log book, which shall state the date, time, observer's signature, and whether any emissions were observed. If visible emissions are observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits. The log book will be maintained on site for 5 years and be made available to representatives of Polk County AQD upon request.				
Proposed Language	Eliminate the NVE observation requirement.				
Justification	This emission point is vented indoors. No history of opacity in building.				

Emission Point	40-01	Emission Unit	40-01	Kohler Emergency Generator
Current Language	Emission Point 40-01 shall be visually checked for observable emissions once every time the emergency generator (EU 40-01) is operated, by a designated observer. The observation shall be taken while the equipment is operating at or near full capacity. The observation shall be noted in a log book, which shall state the date, time, observer's signature, and whether any emissions were observed. If visible emissions are observed, corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity >20% is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits. The log book will be maintained on site for 5 years and be made available to representatives of Polk County AQD upon request.				
Proposed Language	Eliminate the NVE observation requirement.				
Justification	This is an emergency use fire pump that operates on an automated schedule without prior notification. As such, it is not possible to perform an NVE observation every time the unit operates. The emission unit is subject to a NESHAP proposed after 1990 (Subpart ZZZZ proposed 12/2002) and is therefore exempt from periodic monitoring (DNR Periodic Monitoring Guidance Document Appendix A, page 9). The NESHAP includes rigorous operation standards.				

Emission Point	CT-02	Emission Unit	CT-02	Marley Model AQ495M1SAF Cooling Tower
Current Language	Emission Point CT-02 shall be visually checked for observable emissions once every week by a designated observer. The observation shall be taken while the equipment is operating at or near full capacity. The observation shall be noted in a log book, which shall state the date, time, observer's signature, and whether any emissions were observed. If visible emissions are observed, corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity >20% is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals			

	throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits. The log book will be maintained on site for 5 years and be made available to representatives of Polk County AQD upon request.
Proposed Language	Eliminate the NVE observation requirement.
Justification	This is an emergency use fire pump that operates on an automated schedule without prior notification. As such, it is not possible to perform an NVE observation every time the unit operates. The emission unit is subject to a NESHAP proposed after 1990 (Subpart ZZZZ proposed 12/2002) and is therefore exempt from periodic monitoring (DNR Periodic Monitoring Guidance Document Appendix A, page 9). The NESHAP includes rigorous operation standards.

Emission Point	28-C1	Emission Unit	28-C1	Kubota Model 3800 Diesel Fired non-emergency Engine/Compressor
Current Language	Emission Point 28-C1 shall be visually checked for observable emissions once every week by a designated observer. The observation shall be taken while the equipment is operating at or near full capacity. The observation shall be noted in a log book, which shall state the date, time, observer's signature, and whether any emissions were observed. If visible emissions are observed, corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity >20% is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits. The log book will be maintained on site for 5 years and be made available to representatives of Polk County AQD upon request.			
Proposed Language	Eliminate the NVE observation requirement.			
Justification	This is an emergency use fire pump that operates on an automated schedule without prior notification. As such, it is not possible to perform an NVE observation every time the unit operates. The emission unit is subject to a NESHAP proposed after 1990 (Subpart ZZZZ proposed 12/2002) and is therefore exempt from periodic monitoring (DNR Periodic Monitoring Guidance Document Appendix A, page 9). The NESHAP includes rigorous operation standards.			

Responsible Official:

Ms. Rosalind Fox, Factory Manager, Meets the definition of responsible official found in 567 IAC 22.100, since the factory manager is in charge of the principle business functions of John Deere Des Moines Works. She has the authority to allocate funds to address an environmental problem.