

Title V Application Review Notes

Applicant:	MTBT - Marshalltown
SIC Code:	4911 (Electric Services)
City:	Marshalltown
County:	Marshall (#5)
EIQ#:	92-7006
Facility#:	64-01-094
Permit #:	
Reviewer:	Taylor Dailey
Date:	8/2025

Facility Identification

Facility Name:	MTBT - Marshalltown
Facility Location:	402 N 10 th Ave, Marshalltown, IA 50158
Responsible Official:	Shawn Rash
Phone:	(830) 456-2241

Background

MTBT – Marshalltown is an electric services facility (SIC 2873).

This is the initial Title V permit for the facility. The facility consists of 1 emission point (new biogas-fired reciprocating internal combustion engine) and 0 insignificant units. The Title V application for MTBT - Marshalltown was received July 3, 2024. MTBT – Marshalltown is considered a one stationary source with the JBS facility (plant number 64-01-094) which is a meat packaging plant and Industrial Energy Applications (IEA)(plant number 64-01-045).

Regulatory Status

MTBT - Marshalltown is a major source for Title V. See Table 1 below for major source by pollutant.

Table 1
Title V Major Source by Pollutant*

Pollutant	Major for Title V?
PM ₁₀	<input type="checkbox"/>
SO ₂	<input type="checkbox"/>
NO _x	<input type="checkbox"/>
VOC	<input type="checkbox"/>
CO	<input type="checkbox"/>
Lead	<input type="checkbox"/>
Individual HAP	<input type="checkbox"/>
Total HAP	<input type="checkbox"/>

HAPs include Formaldehyde, Acetaldehyde, Acrolein, and Methanol

* MTBT – Marshalltown is considered part of a single stationary source which includes JBS and IEA.

Program Applicability:

- PSD: NO
- Part 61 NESHAP: NO
- NSPS: YES. See Table 2 below.
- Part 63 NESHAP: YES. Will meet the requirements of 40 CFR 63, Subpart ZZZZ by complying with 40 CFR Part 60, Subpart JJJJ.

Table 2
NSPS Applicability

EP	Source Description	Permit#	NSPS Subparts
EP-1	Biogas Generator	22-A-209	A, JJJJ

- Acid Rain: NO
- Stratospheric Ozone Protection: YES
- Prevention of Accidental Releases: NO
- CAM: NO

Construction Permits

The emission units and associated construction permits are listed in Table 4.

Table 4
Emission Units and Associated Construction Permits

Emission Point	Emission Unit	Emission Unit Description	Construction Permit Number
EP-01	EU-01	Biogas Generator	22-A-209

Compliance Status

Facility is in compliance.

The engine was tested on April 3, 2025 for Nitrogen Oxides (NO_x), Volatile Organic Compounds (VOC) and Carbon Monoxide (CO). This test passed, now requiring to test every 3 years or 8760 hours, whichever comes first.

The permittee also completed taking 4 passing gas samples of Hydrogen Sulfide (H₂S).

Periodic Monitoring/CAM

Periodic monitoring requirements were evaluated based on Department's Periodic Monitoring Guidance (PMG). In this permit CAM and O&M plans are not required

Emission Estimates:

Potential emissions for the facility are listed in Table 5.

Table 5
Potential Emissions

Pollutant	Potential Emissions (TPY)
PM _{2.5}	0.53
PM ₁₀	0.53
PM	0.53
SO ₂	2.48
NO _x	37.97
VOC	18.98
CO	94.92
Lead	0.00
Total HAP	3.77

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. MTBT - Marshalltown, located at 402 N 10th Ave, Marshalltown, Iowa has applied for a Title V Operating Permit. The designated responsible official of this facility is Shawn Rash.
2. MTBT - Marshalltown is a electric services facility (SIC 4911). This facility consists of 1 emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ($\leq 2.5 \mu\text{m}$)	PM _{2.5}	0.53
Particulate Matter ($\leq 10 \mu\text{m}$)	PM ₁₀	0.53
Particulate Matter	PM	0.53
Sulfur Dioxide	SO ₂	2.48
Nitrogen Oxides	NO _x	37.97
Volatile Organic Compounds	VOC	18.98
Carbon Monoxide	CO	94.92
Lead	Lead	0.00
Hazardous Air Pollutants ⁽¹⁾	HAP	3.77

⁽¹⁾ May include the following: Formaldehyde, Acetaldehyde, Acrolein, Methanol.

3. MTBT – Marshalltown submitted a Title V Operating Permit application on July 3, 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:

1. The public comment period for the draft permit will run from August 28, 2025 through September 29, 2025. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Taylor Dailey 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 Taylor Dailey 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 permit 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.