

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. Cargill Inc. – Iowa Falls, located at 602 Industrial Rd., Iowa Falls, IA 50126 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Jeff Johnson.
2. Cargill Inc. – Iowa Falls is a soybean processing plant and biodiesel (inorganic chemicals) production plant. This facility consists of 33 emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ($\leq 2.5 \mu\text{m}$)	PM _{2.5}	74.95
Particulate Matter ($\leq 10 \mu\text{m}$)	PM ₁₀	86.99
Particulate Matter	PM	105.20
Sulfur Dioxide	SO ₂	70.84
Nitrogen Oxides	NO _x	70.11
Volatile Organic Compounds	VOC	490.59
Carbon Monoxide	CO	47.17
Lead	Lead	0.01
Hazardous Air Pollutants ⁽¹⁾	HAP	318.65

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

3. Cargill Inc. – Iowa Falls submitted a Title V Operating Permit renewal application on January 2, 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 **Publication Date** through **End Date**. 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
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DNR concludes that:

1. DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 21-33, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.
2. DNR has the authority to issue operating permits for air contaminant sources and to include conditions in such permits under 455B.134 Code of Iowa.
3. The emission limits included in this permit are authorized by 455B.133 Code of Iowa and 567 IAC Chapters 21-33.
4. DNR is required to comply with 567 IAC Chapter 24 in conjunction with issuing a Title V Operating Permit.
5. The issuance of this permit does not preclude the DNR from pursuing enforcement action for any violation.

Title V Application Review Notes

Applicant:	Cargill Inc. – Iowa Falls
SIC Code:	2075
City:	Iowa Falls
County:	Hardin
EIQ#:	92-0760
Facility#:	42-01-003
Permit #:	99-TV-050R5
Reviewer:	Zane Peters
Date:	06/26/2025

Facility Identification

Facility Name:	Cargill Inc. – Iowa Falls
Facility Location:	602 Industrial Road, Iowa Falls, IA 50126
Responsible Official:	Jeff Johnson
Phone:	(765) 586-3408

Background:

Cargill Inc. – Iowa Falls has applied for a renewal of their Title V Operating Permit. The facility is a soybean processing plant and biodiesel (inorganic chemicals) production plant. The principal activities are Soybean Oil Processing and Refining (SIC 2075). The facility consists of 33 emission points and 29 insignificant emission units.

Title V Applicability

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

Program Applicability

- PSD: YES
- Title V: Cargill, Inc – Iowa Falls (Plant No. 42-01-003) is classified as a "*major stationary source*".
- Part 61 NESHAP: Yes
 - 40 CFR 61 Subpart M - National Emission Standard for Asbestos

- NSPS: Yes
 - 40 CFR 60 Subpart A – Standards of Performance for New Stationary Sources – General Provisions
 - 40 CFR 60 Subpart DD – Standards of Performance for Grain Elevators
 - 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
 - 40 CFR 60 Subpart VV – Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry
 - 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
- Major Source of HAPs: Yes
- Part 63 NESHAP: Yes
 - 40 CFR 63 Subpart A – National Emission Standards for Hazardous Air Pollutants for Source Category: General Provisions
 - 30 CFR 63 Subpart FFFF - National Emission Standard for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing
 - 40 CFR 63 Subpart GGGG – National Emission Standards for Hazardous Air Pollutants: Solvent Extraction for Vegetable Oil Production
 - 40 CFR 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial and Industrial Boilers and Process Heaters
- Acid Rain: No
- Stratospheric Ozone Protection: Yes
- Prevention of Accidental Releases: No
- Section 112(j) of the Clean Air Act (MACT Hammer) Compliance Plan: No

Changes Since the Last Issuance

General Changes

- Permit number and relevant permitting dates updated
- Responsible Official, Permit Contact, and Supervisor of Air Operating Permits updated
- Executive Order 10 (EO10) rule references updated. A rules crosswalk is included in the appendices.
- General Conditions updated

Emission Point Specific Changes

- EU S-Temp2 added to the Insignificant Emission Units list (pp. 7)
- EP-01 – EU-1.6 Pod/Hull Receiving Cyclone added to the emission point in accordance with DNR Construction Permit 78-A-071-S10 (pp. 10-13)

- EP-09 – Emission Point REMOVED from the permit
- EP-26 – Emission Point REMOVED from the permit
- EP-32 – References to NSPS Subpart Kb removed. Per 40 CFR 60.110b(d)(8), vessels subject to NESHAP Subpart GGGG are not subject to NSPS Kb. (pp. 46-48)
- EP-35 – Emission Point Characteristics updated in accordance with DNR Construction Permit 01-A-016-S2 (pp. 57-58)
- EP-42, EP-F2, EP-F4 - References to NSPS Subpart Kb removed. All these sources are part of the biodiesel MCPU under NESHAP Subpart FFFF. As they are considered one MCPU, the construction permits lists all the federal regulations that apply to the entire MCPU. NSPS Subpart Kb, however, only applies to the sodium methylate and methanol tanks, both of which vent to EP 41. There are no NSPS Kb tanks under EP 42, EP F2 and EP F4. (pp. 82-84, 101-102, 105-106)
- EP-45 - Emission Point Characteristics updated in accordance with DNR Construction Permit 12-A-532-S1 (pp. 85-87)
- EP-46 – New emission point added to the permit in accordance with DNR Construction Permit 23-A-384 (pp. 88-91)
- EP-47 – New emission point added to the permit in accordance with DNR Construction Permit 23-A-385 (pp. 92-95)
- EP-48.1, EP-48.2, EP-48.3, EP-48.4 - New emission points added to the permit in accordance with DNR Construction Permits 23-A-386, 23-A-387, 23-A-388, & 23-A-389 (pp. 96-99)

Stack Testing

EP-1

Pollutant - Opacity

Stack Test to be Completed by (date) - ⁽¹⁾

Test Method - 40 CFR 60, Appendix A, Method 9

Authority for Requirement - DNR Construction Permit 78-A-071-S10

Pollutant – Particulate Matter (Federal and State)

Stack Test to be Completed by (date) - ⁽¹⁾

Test Method - 40 CFR 60, Appendix A, Method 5, 40 CFR 51 Appendix M, Method 202

Authority for Requirement - DNR Construction Permit 78-A-071-S10

⁽¹⁾Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.

EP-46

Pollutant - Opacity

Stack Test to be Completed by (date) - ⁽¹⁾

Test Method - 40 CFR 60, Appendix A, Method 9

Authority for Requirement - DNR Construction Permit 23-A-384

Pollutant – Particulate Matter (Federal and State)

Stack Test to be Completed by (date) - ⁽¹⁾

Test Method - 40 CFR 60, Appendix A, Method 5, 40 CFR 51 Appendix M, Method 202

Authority for Requirement - DNR Construction Permit 23-A-384

⁽¹⁾ Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.

EP-47

Pollutant – Particulate Matter

Stack Test to be Completed by (date) - ⁽¹⁾

Test Method - 40 CFR 60, Appendix A, Method 5, 40 CFR 51 Appendix M, Method 202

Authority for Requirement - DNR Construction Permit 23-A-385

⁽¹⁾ Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.

EP-48.1, 48.2, 48.3, 48.4

Pollutant - Opacity

Stack Test to be Completed by (date) - ⁽¹⁾

Test Method - 40 CFR 60, Appendix A, Method 9

Authority for Requirement - DNR Construction Permits 23-A-386, 23-A-387, 23-A-388, 23-A-389

Pollutant – Particulate Matter (Federal and State)

Stack Test to be Completed by (date) - ⁽¹⁾

Test Method - 40 CFR 60, Appendix A, Method 5, 40 CFR 51 Appendix M, Method 202

Authority for Requirement - DNR Construction Permits 23-A-386, 23-A-387, 23-A-388, 23-A-389

⁽¹⁾ Within 60 days after achieving the maximum production rate but not later than 180 days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.

Periodic Monitoring Guidance

Facility O & Ms are required for PM for Emission Points 1, 2, 4, 7, 8, 10, 11, 14, 15, 27, 29, 35, 36, 37, 38, 39, 45, 46, 47.

Facility O & Ms are required for PM₁₀ for Emission Points 1, 2, 4, 7, 8, 10, 11, 14, 29, 35, 36, 37, 39, 45, 46, 47.

Facility O & M is required for VOC and THAP for Emission Point 41.

Other Notes – The Cargill Consent Decree was completely terminated in 2018. In accordance with the requirements, Cargill certified compliance and filed with the court to terminate on August 17, 2018. CD requirements were incorporated into construction permits and the Decree was removed from Title V draft.