

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) 22.107(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. IPL – Ottumwa Generating Station, located at 20775 Power Plant Road, Ottumwa, Iowa 52501, has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Danny Lamb.
2. IPL – Ottumwa Generating Station is an Electric Services (SIC 4911) facility. This facility (OGS alone) consists of 47 emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (TPY)
Particulate Matter ($\leq 2.5 \mu\text{m}$)	PM _{2.5}	2,914.09
Particulate Matter ($\leq 10 \mu\text{m}$)	PM ₁₀	3,117.46
Particulate Matter	PM	5,124.00
Sulfur Dioxide	SO ₂	33,625.76
Nitrogen Oxides	NO _x	7,485.45
Volatile Organic Compounds	VOC	205.92
Carbon Monoxide	CO	6,190.21
Lead	Lead	0.09
Hazardous Air Pollutants ⁽¹⁾	HAP	278.32

⁽¹⁾ A complete listing of individual HAPs are listed in the facility's Title V Permit Renewal Application.

3. IPL – Ottumwa Generating Station applied for a Part 70 Title V Operating Permit renewal. The renewal application was received on 11/21/2022, and supplemental materials were received on 08/12/2024 and 9/22/2025. Based on the information provided in these documents, the 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. The 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.

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

1. The public comment period for the proposed permit will run from 9/25/2025 through 10/25/2025. 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 Derek Wedemeier at the DNR 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. The DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to Derek Wedemeier at the DNR address shown below.
3. The 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, the 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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IDNR concludes that:

1. The DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 20-31, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.
2. The 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 20-31.
4. The DNR is required to comply with 567 IAC Chapter 22 in conjunction with issuing a Title V Operating Permit.
5. The issuance of this permit does not preclude the IDNR from pursuing enforcement action for any violation.

Title V Permit Review Notes

Facility Name:	IPL – Ottumwa Generating Station
City:	Ottumwa
County:	Wapello
Facility #:	90-07-001
EIQ #:	92-2774
Permit #:	98-TV-009-R3
Reviewer:	Derek Wedemeier
Issued	**DATE**

IPL – Ottumwa Generating Station applied for a Part 70 Title V Operating Permit renewal. The renewal application was received on 11/21/2022, and supplemental materials were received on 08/12/2024. The facility is an electric service facility (SIC 4911) consisting of 47 significant emission units and 19 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 checked="" type="checkbox"/>
Lead	<input type="checkbox"/>
Individual HAP	<input checked="" type="checkbox"/>
Total HAPs	<input checked="" type="checkbox"/>

Program Applicability

- PSD: Yes
- Part 61 NESHAP: No
- Major Source of HAPs: Yes
- Part 60 NSPS: Yes
 - 40 CFR 60 Subpart A – General Provisions
 - 40 CFR 60 Subpart D – Standards of Performance for Fossil-Fuel-fired Steam Generators for Which Construction Is Commenced After August 17, 1971: EU-1
 - 40 CFR 60 Subpart Y - Standards of Performance for Coal Preparation and Processing Plants: EP 3, EP 4, EP 8, EP 10, EP 72a, EP 73a, EP 78. Each of these units are subject to a 20% opacity limit.
 - 40 CFR 60 Subpart GG – Standards of Performance for Stationary Gas Turbines: EP 92
- Part 63 NESHAP: Yes
 - 40 CFR 63 Subpart A – General Provisions

- 40 CFR 63 Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)
- 40 CFR 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters
- 40 CFR 63 Subpart UUUUU - National Emission Standards for Hazardous Air Pollutants: Coal and Oil-Fired Electric Utility Steam Generating Units: EU-1
- Acid Rain: Yes, EU-1
- Stratospheric Ozone Protection: No.
- Prevention of Accidental Releases: No.

General Updates

Responsible Official and permit contact were updated following the facility review period. The administrative modification was submitted 9/22/2025.

System-wide Consent Decree Requirements for IPL Facilities in Iowa

Any requirements contained in the permit that are required by and refer to “Consent Decree” [*United States of America and The State of Iowa, and The County of Linn, Iowa and Sierra Club v. Interstate Power and Light Company*, Civil Action No.: C15-0061; United States District Court for the Northern District of Iowa (July 15, 2015)] have been included in the permit solely to comply with the Consent Decree.

Emission Estimations

The potential emissions calculations were based off of construction permit limits, AP-42 emission factors, stack test data, mass balance and engineering estimates provided by the facility. The 500ppmv allowable SO₂ SIP limit overestimates the potential emissions. The AP-42 emission factors for SO₂, if available, were used instead and provide a more realistic potential value.

PTE Emission Values*

PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Lead	Total HAPs
Potential Emissions								
5,124.00	3,117.46	2,914.09	33,625.76	7,485.45	205.92	6,190.21	0.09	278.32
Actual Emissions 2024								
365.78	325.78	317.47	593.39	551.38	0.41	677.10	0.01	8.88

Removed Insignificant Units

- 54.21 – Sulfuric Acid Tank, East (3,200 gallons) – not included in this renewal.
- 53 – Plant Vacuum System
- 101 – Ash Pile Bulldozing
- 102 – Ash Pile Open Storage
- 104 – 550 Gallon On-Road Diesel Tank
- 105 – 5500 Gallon On-Road Diesel Tank (NMC Site)

Rescinded Construction Permit

Emission Point	Description	Construction Permit	Rescission Date
94	Economizer Hydroveyor Fly Ash Separator	99-A-178-S2	4/5/2021
98	Ash Pond Dredging	NA	Not included in Application

Emission Specific Comments

EP 1: Boiler

Construction permit 78-A-019P17 was modified three times since the previous renewal to update the allowable injection material and removed refined coal as an allowed fuel; installed bottom ash handling system and updated recordkeeping; and added consent decree language. Requirements of the consent decree is located in the permit appendix. NESHAP UUUUU specific language was added to operational requirements for EP 1. EU-1 is subject to the Acid Rain Program and a separate Acid Rain Phase II permit is added to the appendix of the permit. CEMS are required for PM, Opacity, SO₂, NO_x, CO, CO₂ and CO_{2e}. Based on these CEMs systems, no additional monitoring will be required.

Application documents identify an EU 303 DFGD By-product Vacuum exhauster 2 associated with EP 1. This is not included in the construction permit. Review of the engineering evaluation 23-154 states IPL requested to remove this emission unit. The facility confirmed this equipment had been removed in an emailed dated 7/24/2025. EU 303 and its associated control equipment have not been included in the Title V permit.

EP 2: Coal Pile (Fugitive) - No changes

EP 3 & EP 4: West Rotary Car Dump & East Rotary Car Dump –These emission points are controlled by a common baghouse CE: 3-4. Weekly opacity monitoring is required. CAM is required for the baghouse. Periodic monitoring guidance suggests testing for PM and PM₁₀ for each emission point and will be required within 2 years of permit issuance.

EP 8: Coal Conveying Transfers House – This emission point is controlled by CE 3, Pulse Jet Baghouse. Weekly opacity monitoring is required for this emission point. Periodic monitoring guidance recommends one test for PM and PM₁₀. Testing was previously completed in 2008 and was passing. Due to the age of the previous test, testing will be required within 2 years of permit issuance. CAM applies for PM₁₀.

EP 10: Coal Crusher House – This emission point is controlled by CE 4: Baghouse. Operating conditions require a maintained pressure drop of 0.1 – 8.0 inches of water column across the baghouse. Weekly opacity monitoring is required. CAM is required for PM₁₀ with using emission limits to calculate PTE for PM and PM₁₀. Stack testing was last completed at EP 10 on 10/31/2017 and passed with a significant margin of compliance. Additional stack testing will not be required during this renewal.

EP 11 & EP 12: Coal Pile Stacker/Reclaimer & Emergency Conveyor to Coal Pile (Fugitive)
No Changes.

EP 38: Two (2) Lime Silos – Construction permit 99-A-174-S4 was updated to correct stack characteristics in 2022. The construction permit was also amended to include an hourly PM limit of

0.30 lb/hr based on an uncontrolled AP42 emission factors of 0.2lb/ton. Operating conditions meet the requirements of a Facility O&M. The facility reports a 95% control efficiency for PM, PM10 and PM2.5 for the baghouse CE 10 in the application. Periodic monitoring does not recommend any additional monitoring. CAM does not apply because precontrol PTE does not exceed the major source threshold.

EP 56 & 57: #2 Fuel Oil East and West Tanks - No changes. The 2023 DNR Field office inspection identified EP 56 as out of service since 2016. This unit will remain in the permit since it could be brought back into service.

40 CFR Part 60, Subpart K – *Standards of Performance for Storage Vessels for Petroleum Liquids*: The facility is not subject to Subpart K. Tanks EU 56-100 (EP 56: Fuel Oil Tank, Vertical Fixed Roof) and EU 57-101 (EP 57: Fuel Oil Tank, Vertical Fixed Roof) store only #2 fuel oil, but not #1 fuel oil; therefore, they are not subject to Subpart K. These tanks were constructed in 1976-77 and have a capacity of 846,000 gallons each. No. 2 fuel oil is exempted from the Subpart K, but No. 1 fuel is a liquid covered by Subpart K. See the definition of *petroleum liquids* in 40 CFR 60.111(b).

EP 67: Boiler for Plant Heat – Construction permit 04-A-816-S5 was updated in 2024 which involved retubing the heater boiler to increase efficiency of the unit. No changes were made to emission limits. The boiler is limited to 484,428 gallons of fuel oil per 12 month rolling period. This unit is subject to NESHAP DDDDD.

EP 69: NUVA Feeder Room (Fugitive) No changes

EP 71: Welding Booth – No changes

EP 72a & EP 73a: West/East Side Coal Silo – These emission points are controlled by baghouses, CE 72a and CE 73a, respectively. Weekly opacity monitoring is required for each emission point. Periodic monitoring guidance recommends one test for PM and PM10 for each silo. No previous records of testing were available for this equipment. Testing will be required within 2 years of permit issuance. CAM applies for PM and PM10 for each emission point.

EP 75: Parts Washer Main Building – No changes

EP 78: Cargill Coal Silo. This unit is currently out of service but being maintained according to the 2023 DNR Field Office inspection. This unit is controlled by CE8, Dust collector. An Agency O&M has been included to remain consistent with the previous renewal. No changes have been made to the equipment. Stack testing is not recommended by periodic monitoring guidance.

EP 79: Cargill Silo Truck Loadout Chute (Fugitive). This unit is currently out of service but being maintained according to the 2023 DNR Field Office inspection. No changes.

EP 80: Fly Ash Silo Unloading Chute and C-Stone Production (Fugitive). No Changes

EP 92: Emergency Generator Combustion Turbine. This unit is out of service. No changes. This unit is subject to NSPS GG. This unit is not subject to NSPS KKKK because it was construction prior to Feb 18, 2005 and not subsequently modified or reconstructed. This unit is limited to 500hr of operation per 12-rolling months.

EP 100: Coal Pile Bulldozing (Fugitive) No changes.

EP 200 & 201 West and East Fly Ash Facility – These units are controlled by baghouses. No operational requirements are present for either emission points. The facility CAM spreadsheet identified precontrol PTE does not exceed the major source threshold for PM. Stack test data from 2006 support this. Due to the age of the test, one representative stack test will be required for PM at either of these emission points. A Facility O&M plan will be required.

EP 301: DFGD By-Product Silo

EP 306: Limo Silo

EP 307: DFGD Recycle Product Silo

EP 311: Mercury Sorbent Silo

No changes. Precontrol PTE does not exceed the major source threshold so CAM does not apply. PMG does not recommend testing. A facility O&M plan is required for the units above. Weekly opacity monitoring is required for each of these emission points.

EP 312-F: Ash Silo Fugitives and Pyrites Dewater Bins Fugitives – New units under construction permit 18-A-670. No additional monitoring is required by the Title V permit.

EP 312, 313, and 314: DGSD By-Product Silo Loadout and Flop Gates – New units to the Title V permit under construction permit 16-A-322. The owner or operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property. No additional monitoring is required by the Title V permit.

EP 315: Telescopic Unloader Vent – This unit is new to the Title V permit and is controlled by cartridge filter, CE 315. Operating conditions listed within construction permit 18-A-673 are equivalent to a Facility O&M plan. No additional monitoring is required by the Title V permit. Precontrol emissions do not exceed the major source threshold so testing will not be required and CAM does not apply.

EP 313-F, 314-F, 316-F: Coal Loading Dewater Bins and Settling Tank (Fugitives) – These units are new to this Title V. The owner or operator shall follow best management practices and take reasonable precautions to prevent the discharge of visible emissions of fugitive dust from the coal sludge bin. No additional monitoring will be required by the Title V for these units.

Insignificant activities

Note that EU 55-9 (Diesel Fuel Tank) is not subject to 40 CFR Part 60, Subpart K because its capacity of 2,000 gallons is less than the Subpart K threshold value of 40,000 gallons. Furthermore, it is an insignificant unit because its VOC potential of 0.2 tpy is less than the threshold value of 5 tpy.

Summary of Title V Testing/Monitoring Requirements

The following periodic monitoring requirements will be required in the renewal of the Title V permit in accordance with the Department's Periodic Monitoring Guidance.

EP #	EU #	Emission Unit Description	Testing/Monitoring Required				
			PM	PM10	Opacity	O&M Plan	PM10 CAM
1	1	Main Plant Boiler	CEM ⁽¹⁾		COMS		
3	3-59	West Rotary Car Dumper	Yes	Yes	Yes		Yes
4	4-59	East Rotary Car Dumper	Yes	Yes	Yes		Yes
8	8-60	Coal Conveying in Transfer	Yes	Yes	Yes		Yes
10	10-61	Coal Crusher House			Yes		Yes
38	38-56	Two Lime Silos				F*	
72a	72-27	East Side Coal Silo	Yes	Yes	Yes		Yes
73a	73-28	West Side Coal Silo	Yes	Yes	Yes		Yes
78	78-18	Cargill Coal Silo				A	
200	200	Fly Ash Facility	Yes ⁽²⁾			F	
201	200	Fly Ash Facility	Yes ⁽²⁾			F	
301	301	DFGD By-Product Silo			Yes	F	
306	306	Lime Silo			Yes	F	
307	307	DFGD Recycle Product Silo			Yes	F	
311	311	Mercury Sorbent Silo			Yes	F	
315	315	Telescopic Unloader				F*	

⁽¹⁾ CEMS is required for PM, SO₂, NO_x and CO

⁽²⁾ One representative test is required for PM at either EP 200 or EP 201.

* Operational conditions from the construction permit meet Facility O&M requirements.