

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. University of Iowa, located at 105 Jessup Hall, Iowa City, IA 52242 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Rodney Lehnertz.
2. University of Iowa is a College/University. This facility consists of 177 emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ($\leq 2.5 \mu\text{m}$)	PM _{2.5}	85.90
Particulate Matter ($\leq 10 \mu\text{m}$)	PM ₁₀	97.72
Particulate Matter	PM	111.51
Sulfur Dioxide	SO ₂	1,602.97
Nitrogen Oxides	NO _x	751.84
Volatile Organic Compounds	VOC	172.75
Carbon Monoxide	CO	444.73
Lead	Lead	0.52
Hazardous Air Pollutants ⁽¹⁾	HAP	165.17

⁽¹⁾ May include the following: See application.

3. University of Iowa 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 October 30, 2025 through November 29, 2025. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Derek Wedemeier 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 Derek Wedemeier 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.

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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.

Draft Title V Application Review Notes

Applicant:	University of Iowa
SIC Code:	8221 (College/University)
City:	Iowa City
County:	Johnson (FO #6)
EIQ#:	92-6571 & 92-5191
Facility#:	52-01-005
Permit #:	00-TV-002R4 Draft
Reviewer:	Derek Wedemeier
Date:	**DATE**

Facility Identification

Facility Name:	University of Iowa
Facility Location:	105 Jessup Hall, Iowa City, IA 52242
Responsible Official:	Rodney P. Lehnertz
Phone:	(319) 335-3552

Background

The University of Iowa previously held two Title V permits: one permit was for the Main Campus, Hospitals, and Oakdale Campus; and the other Title V permit was for the Power Plant. Since the university was issued Plant-Wide Applicability Limit (PAL) permits, the university could no longer hold two separate Title V permits per 567 IAC 22.105(5), and the permits were combined in the second renewal permit for the Main Campus. The University of Iowa has since updated their plant-wide emission limit (PAL) permits for VOC, NO_x, SO₂ in addition to PM, PM₁₀, PM_{2.5}, and CO.

The emission units for the facility include generators, boilers, cooling towers, and coal and biomass handling and storage. There are also emission units from pharmacy tablet manufacturing, underground storage tanks, paint booths, as well as a few miscellaneous processes.

This is the fourth renewal Title V Permit for the University of Iowa. The initial Title V permit for the Main Campus, Hospitals, and Oakdale Campus was issued January 7, 2000; the first renewal permit was issued September 29, 2008; the second renewal permit for the combined facility was issued January 20, 2015; and the third renewal permit for the combined facility was issued August 21, 2020. The initial Title V permit for the Power Plant was also issued January 7, 2000; the first renewal permit was issued October 26, 2005; and the second renewal permit was issued July 26, 2012 before being combined with the Main Campus.

Regulatory Status

The University of Iowa 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	☐
SO ₂	☒
NO _x	☒
VOC	☒
CO	☒
Lead	☐
Individual HAP	☒
Total HAPs	☒

HAPs emitted from the facility's emission units may include: 1,2-Dichloropropane, 1,4-Dichlorobenzene, Acetaldehyde, Acrolein, Antimony Compounds, Arsenic Compounds, Benzene, Benzyl chloride, Beryllium Compounds, Biphenyl, Bromomethane, Cadmium Compounds, Carbon disulfide, Carbon tetrachloride, Chlorine, Chlorobenzene, Chloroform, Chloromethane, Chromium Compounds, Cobalt Compounds, Cyanide Compounds, Dibutyl Phthalate, Ethyl benzene, Fluoride Compounds, Formaldehyde, Hexane, Hydrochloric acid, Hydrogen Fluoride, Isophorone, Manganese Compounds, Mercury Compounds, Methanol, Methyl hydrazine, Methylene Chloride, Methyl isobutyl ketone, Naphthalene, Nickel, Phenol, Propionaldehyde, Selenium, Styrene Tetrachloroethene, Toluene, Trichloroethene, Vinyl chloride, and Xylenes, m-Xylene, o-Xylene.

Program Applicability:

- PSD: YES, this facility is considered a major stationary source due to PTE.
- Part 60 NSPS: YES. See Tables 2a, 2b, 2d, and 2e.
- Part 61 NESHAP: YES, Subpart M only.
- Part 63 NESHAP: YES. See Tables 2a, 2b, 2c, 2d, and 2e.
 - All other generator engines not listed below are subject to NESHAP ZZZZ.

Table 2a
Emission Units Subject to NSPS IIII and NESHAP ZZZZ

EP	Source Description	Construction Permit Number
EP-003-5	Chemistry Building Generator	06-A-851
EP-075-1	College of Public Health Generator	09-A-480
EP-212-1	EPF1 Emergency Generator	08-A-074
EP-239-6	Oakdale PP Emergency Generator	09-A-481-S2
EP-290-1	ITC Generator	11-A-292
EP-374-2	CHA Generator	10-A-272
EP-52	IRL ACF Generator	12-A-109
EP-62	UIHC Centralized Emergency Power Generator 1	15-A-194

EP	Source Description	Construction Permit Number
EP-63	UIHC Centralized Emergency Power Generator 2	15-A-195
EP-64	UIHC Centralized Emergency Power Generator 3	15-A-196
EP-70	UIHC Centralized Emergency Power Generator 4	22-A-310
EP-71	UIHC Centralized Emergency Power Generator 5	22-A-311
EP-046-4	IMU Generator	06-A-852
EP-188-1	Spence Labs Generator	Exempt
EP-274-2	Slater Hall Generator	Exempt
EP-308-1	WCCWP Generator	Exempt
EP-68	UIHC Integrated Services Center Generator	19-A-139-S1

Table 2b
Emission Units Subject to NSPS JJJJ and NESHAP ZZZZ

EP	Source Description	Construction Permit Number
EP-042-3	Kinnick Stadium Generator	18-A-126
EP-106-1	College of Pharmacy Generator	18-A-134
EP-272-1	Madison Street Residence Hall Emergency Generator	15-A-435
EP-275-1	West Campus Residence Hall Generator	13-A-543
EP-391-6	Mayflower Residence Hall Generator - Pump Station	14-A-259
EP-084-1	Health Sciences Academic Building NG Emergency Generator	23-A-428-S1
EP-240-1	OREP Engine 1	09-A-395-S2
	OREP Engine 2	
EP-PP52.1	Natural Gas-Fired Generator 1	12-A-508
EP-PP52.2	Natural Gas-Fired Generator 2	12-A-509
EP-PP52.3	Natural Gas-Fired Generator 3	12-A-510
EP-PP52.4	Natural Gas-Fired Generator 4	12-A-511
EP-037-1	Art Building West Generator	Exempt
EP-046-5	IMU Generator - Flood Mitigation	Exempt
EP-068-1	CRWC Generator	Exempt
EP-079-1	Stanley Museum of Art Generator	Exempt
EP-090-1	Art Building Replacement Natural Gas Generator	Exempt
EP-120-1	Hancher Generator	Exempt
EP-125-1	Voxman Music Building Natural Gas Generator	Exempt
EP-137-1	HRDP NG Emergency Generator	Exempt
EP-149-1	GFWC Emergency NG Generator	Exempt
EP-391-7	Mayflower Residence Hall Generator - Dewatering Wells	Exempt
EP-418-4	IATL Generator - Flood Mitigation	14-A-472
EP-51	Aircare Generator	Exempt
EP-61	IRL ACF Natural Gas Generator	Exempt
EP-278-2	DSB Natural Gas 300 kW Generator	Exempt
EP-457-10	Hawkeye Tennis RC Natural Gas Generator 14kW	Exempt

Table 2c
Emission Units Subject to NESHAP GGG

EP	Source Description	Construction Permit Number
EP-006-4 EP-006-5 EP-006-6 EP-006-7	Pharmacy Tablet Manufacturing-Room 44C	99-A-943-S5 99-A-944-S5 99-A-945-S5 99-A-946-S5
	Pharmacy Tablet Manufacturing-Room 32A	
	Pharmacy Tablet Manufacturing-Room 32H	
	Pharmacy Tablet Manufacturing-Room 32C	
	Pharmacy Tablet Manufacturing-Room 32F	
	Pharmacy Tablet Manufacturing-Room 41B	
	Pharmacy Tablet Manufacturing-Room 43E	
EP-106-2	Pharmaceutical Manufacturing Process Unit #1	19-A-107

Table 2d
NSPS Db, Dc, and NESHAP DDDDD Applicability

EP	Source Description	Construction Permit Number	NSPS and/or NESHAP Subpart(s)
EP-055-3	Obermann Steam Boiler #2	Exempt	NESHAP DDDDD
EP-300-1	Jefferson Building Boiler		
EP-300-2	Jefferson Building Boiler		
EP-391-1	Mayflower Boiler		
EP-391-4	Mayflower Boiler		
EP-391-5	Mayflower Boiler		
EP-395-1	Hansen Football Performance Center Boiler #1		
EP-395-2	Hansen Football Performance Center Boiler #2		
EP-395-3	Hansen Football Performance Center Boiler #3		
EP-434-1	Levitt Center Hot Water Boiler		
EP-434-3	Levitt Center Hot Water Boiler		
EP-434-5	Levitt Center Hot Water Boiler		
EP-441-17	Laundry Building Boiler #3		
EP-441-18	Laundry Building Boiler #4		
EP-239-1	Oakdale Boiler #2	78-A-023-S9	NSPS Dc NESHAP DDDDD
	Oakdale Boiler #3		
	Oakdale Boiler #4		
	Hurst Boiler #5		
EP-674-1	Boilers 1, 2B, 3 NG and Fuel Oil	08-A-622-S1	NSPS Dc NESHAP DDDDD
EP-PP03	Boiler #7	91-A-064 & PSD	NSPS Db NESHAP DDDDD
EP-PP04	Boiler #8	91-A-063 & PSD	
EP-PP06	Boiler #10	75-A-282-S8 & PSD	NESHAP DDDDD
EP-PP07	Boiler #11	95-A-438-P4 & PSD	NSPS Db NESHAP DDDDD
EP-PP43	Boiler T1	06-A-778-S4	NSPS Dc NESHAP DDDDD
EP-PP44	Boiler T2	06-A-779-S4	
EP-PP55	Boiler 12	17-A-106	NSPS Db NESHAP DDDDD

EP	Source Description	Construction Permit Number	NSPS and/or NESHAP Subpart(s)
EP-18	Pomerantz Family Pavilion Boiler	09-A-197	NSPS Dc NESHAP DDDDD

Table 2e
Emission Units Subject to NSPS Y

EP	Source Description	Construction Permit Number
EP-PP08	Coal Crusher #1	87-A-113-P1
EP-PP09	Coal Crusher #2	87-A-114-P1
EP-PP12	Coal Silo #3	87-A-117-P2
EP-PP28*	Coal Unloading Pit	87-A-120
EP-PP30	Minibunker 11	95-A-439-S1
	Coal Crusher #3	
	Coal Crusher #4	
EP-PP50	Conveyor Discharge Enclosure	12-A-457-S1

*EP-PP28, Coal Unloading Pit was further evaluated to clarify if it was subject to Subpart Y. Additional information from the facility indicated that the coal unloading pit is a grated, under-ground box that coal is unloaded into. There is a conveyor at the bottom of the pit that moves the coal into the coal silos. It is not considered a storage pile. Therefore, this source remains subject to Subpart Y.

Table 3 - Other NSPS and NESHAP Applicability Determinations

EP	Source Description	Applicability Determination
EP-15	Boyd Tower Paint Booth	Units are maintenance operations – NESHAPs MMMM <i>Surface Coating of Miscellaneous Metal Parts and Products</i> and PPPP <i>Surface Coating of Plastic Parts and Products</i> do not apply.
EP-308-2	WCCWP Cooling Tower 1	Units are located in the chilled water plant and used to cool several buildings – not an industrial process cooling tower as defined in NESHAP Q <i>Industrial Process Cooling Towers</i> ; "any cooling tower that is used to remove heat that is produced as an input or output of a chemical or industrial process(es), as well as any cooling tower that cools industrial processes in combination with any heating, ventilation, or air conditioning system". NESHAP Subpart Q does not apply.
EP-308-3	WCCWP Cooling Tower 2	
EP-308-4	WCCWP Cooling Tower 3	
EP-240-2	Cooling Tower 1	Chromium-based water treatment chemical usage is prohibited for these emission units – NESHAP Subpart Q does not apply.
EP-240-3	Cooling Tower 2	
EP-026-2	UHL Cooling Tower 1	
EP-026-3	UHL Cooling Tower 2	Units were constructed prior to 10/27/74. Subpart Y does not apply.
EP-PP10	Coal Silo #1	
EP-PP11	Coal Silo #2	

EP	Source Description	Applicability Determination
Insignificant Units: EU-337-AST-1 EU-342-UST-1	Gasoline Tank (1,000 gal) Fleet Services Gasoline UST (12,000 gal)	NESHAP CCCCCC <i>Gasoline Dispensing Facilities</i> does not apply since the facility is a major, not area, source for HAP.
EP-006-4 EP-006-5 EP-006-6 EP-006-7	Pharmacy Tablet Manufacturing-Room 44C Pharmacy Tablet Manufacturing-Room 32A Pharmacy Tablet Manufacturing-Room 32H Pharmacy Tablet Manufacturing-Room 32C Pharmacy Tablet Manufacturing-Room 32F Pharmacy Tablet Manufacturing-Room 41B Pharmacy Tablet Manufacturing-Room 43E	NESHAP VVVVVV <i>Area Source Standards for Chemical Manufacturing</i> does not apply since the facility is a major, not area, source for HAP.
EP-106-2	Pharmaceutical Manufacturing Process Unit #1	
Various	Coal and Oil-fired Electric Utility Steam Generating Units	NESHAP UUUUUU does not apply since none of the units are larger than 25 MW.
EP-239-1 (BLR-5) PP06 PP07	Hurst Boiler #5 Boiler No. 10 Boiler No. 11	NSPS subparts Cb <i>Large Municipal Waste Combustors</i> , Ea <i>Municipal Waste Combustors</i> , NSPS Eb <i>Small Municipal Waste Combustor</i> , AAAA <i>Small Municipal Waste Combustion Units</i> , and BBBB <i>Small Municipal Waste Combustion Units</i> do not apply to these units since they do not combust municipal waste.
		NSPS subparts Ce <i>Hospital, Medical, Infectious Waste Incinerators</i> , Ec <i>Hospital, Medical, Infectious Waste Incinerators</i> , and E – <i>Incinerators</i> do not apply to these units since they do not combust hospital/medical/infectious waste or municipal type waste as defined in 60.51a in subpart Ea.
		NSPS subparts EEEE <i>Solid Waste Incineration Units</i> Constructed After 12/9/2004 and FFFF <i>Solid Waste Incineration Units</i> Constructed Before 12/9/2004 do not apply as these units are exempt since they are institutional boilers and are regulated by NESHAP subpart DDDDD.
EP-239-1 (BLR-5)	Hurst Boiler #5	NSPS subparts CCCC <i>Commercial and Industrial Solid Waste Incineration Units</i> for which Construction is Commenced after November 30, 1999 and DDDD <i>Commercial and Industrial Solid Waste Incineration Units</i> that Commenced Construction on or before November 30, 1999 do not apply to this unit since the facility is an institutional facility, not a commercial or industrial entity.

- CSAPR: NO
- Acid Rain: NO. The facility does not generate electricity for wholesale or retail sale and does not own or operate one of the Phase I or Phase II units listed in 40 CFR 73.10.

- Stratospheric Ozone Protection: YES
- Prevention of Accidental Releases: YES, for wastewater treatment facility only.
- CAM: YES. Compliance Assurance Monitoring (CAM) requirements were evaluated based on the Department's CAM Spreadsheet. Potential pre-control PM/PM₁₀ emissions for EP-PP06 Boiler #10, and EP-PP07 Boiler #11 are greater than major source thresholds; both emission points are subject to CAM.

Compliance Status

The facility appears to be in compliance with all applicable rules and regulations.

Stack Testing

See Table 4 for stack testing required in the permit.

Table 4
Stack Testing Required

EP	Source Description	Pollutants	Test Due	Construction Permit Number or Authority for Requirement
EP-240-1	OREP Engine 1	CO or Formaldehyde (Annually) NO _x , VOC, CO (8760 hr or 3yr)	Annually, per Subpart JJJJ/YYYY, Table 3 Every 8760 hours or 3 years, whichever comes first.	09-A-395-S2
	OREP Engine 2			
EP-PP52.1	Natural Gas-Fired Generator			12-A-508
EP-PP52.2	Natural Gas-Fired Generator			12-A-509
EP-PP52.3	Natural Gas-Fired Generator			12-A-510
EP-PP52.4	Natural Gas-Fired Generator			12-A-511
EP-PP06	Boiler No.10	PM, PM ₁₀ , PM _{2.5}	See Permit - Within 120 days of increasing approved fuel to new mixture rate or annually	75-A-282-S8 & PSD, 16-A-045-PAL1 16-A-046-PAL1 16-A-047-PAL1
EP-PP07	Boiler No.11	PM, PM ₁₀ , PM _{2.5} , CO	See Permit - Within 120 days of increasing approved fuel to new mixture rate or annually	95-A-438-P4 & PSD 16-A-045-PAL1 16-A-046-PAL1 16-A-047-PAL1

- Performance testing requirements in the PAL permit for EP's EP-PP06 and EP-PP07 that allow for less frequent testing for PM_{2.5} and PM₁₀ both utilize the PM₁₀ test results to determine if the testing requirements may be relaxed (i.e. the PM_{2.5} testing frequency relaxation is based on PM₁₀ results).

Periodic Monitoring Evaluation

Periodic monitoring requirements were evaluated based on the Department's Periodic Monitoring Guidance (PMG) document. The periodic monitoring evaluation indicated stack tests should be required for the emission points shown in Table 5 in addition to the testing shown in

Table 4. The reason for not requiring stack tests for each emission unit is also provided in the Table 5.

Table 5
Periodic Monitoring Evaluation Indicates Stack Testing

EP	Source Description	Pollutants	Reason Not Required in Title V Permit
EP-PP52.1	Natural Gas-Fired Generator 1	CO	Already required to be stack tested every 8760 hours or 3 years, whichever comes first.
EP-PP52.2	Natural Gas-Fired Generator 2	CO	
EP-PP52.3	Natural Gas-Fired Generator 3	CO	
EP-PP52.4	Natural Gas-Fired Generator 4	CO	
EP-PP03	Boiler #7	NO _x	CEMs
EP-PP04	Boiler #8	NO _x	CEMs
EP-PP06	Boiler #10	PM, PM ₁₀ , NO _x , SO ₂ , CO	PM, PM ₁₀ – Required to be stack tested annually in PAL permits. NO _x , SO ₂ , CO – CEM for Opacity, NO _x , SO ₂ , CO, and O ₂ or CO ₂ .
EP-PP07	Boiler #11	PM, PM ₁₀ , NO _x , SO ₂ , CO	PM, PM ₁₀ , CO – Required to be stack tested annually in PAL permits. NO _x , SO ₂ – CEM for Opacity, NO _x , SO ₂ , and O ₂ or CO ₂ .

O&M Plans

The periodic monitoring evaluation indicated operation and maintenance (O&M) plans are required for the emission points listed in Table 6. The type of O&M indicated is shown in the table.

- A Facility O&M plan was suggested by PMG for PM for EP-106-2 Pharmaceutical Manufacturing Process Unit #1; however, it was not included in the Title V permit because the construction permit adequately addresses this requirement.
- An Agency O&M was suggested by PMG for PM, PM₁₀, and NO_x for EP-PP06 Boiler #10; however, it was not included in the Title V permit for PM/PM₁₀ because the unit is subject to CAM for these pollutants, and NO_x because the unit has a CEMS for this pollutant.
- An Agency O&M was suggested by PMG for PM, PM₁₀, and SO₂, for EP-PP07 Boiler #11; however, it was not included in the Title V permit for PM/PM₁₀ because the unit is subject to CAM for these pollutants, and SO₂ because the unit has a CEMS for this pollutant.
- A Facility O&M was suggested by PMG for NO_x for EP-PP55 Boiler 12; however, it was not included in the Title V permit because the construction permit adequately addresses this requirement. This unit is also required to have a NO_x CEMS so would not require a Facility O&M.
- The Facility O&M required by the previous Title V permit was removed for EP-239-1, because the unit is only subject to PMG when the unit burns solid fuel, and the

construction permit for the emission unit adequately addresses control equipment performance when the unit is burning solid fuel.

- A Facility O&M was suggested by PMG for PM at the Cooling Towers EP-674-8 through EP-674-12 however, it was not included in the Title V permit because the construction permit adequately addresses this requirement.

Table 6
Operation and Maintenance Plan Requirements
Based on the Periodic Monitoring Evaluation

EP	Source Description	Pollutants	O&M
EP-PP52.1	Natural Gas-Fired Generator	VOC, CO	Facility
EP-PP52.2	Natural Gas-Fired Generator	VOC, CO	Facility
EP-PP52.3	Natural Gas-Fired Generator	VOC, CO	Facility
EP-PP52.4	Natural Gas-Fired Generator	VOC, CO	Facility
EP-15	Boyd Tower Paint Booth	PM, PM ₁₀	Agency

Facility O&M plans are also required for the emission points listed in Table 7. The plans are required based on the type of equipment and associated control equipment, the pollutants emitted, and the pollutant source rather than uncontrolled potential to emit.

Table 7
Additional Facility Operation and Maintenance Plan Requirements
to Ensure Compliance with Emission Limits

EP	Source Description	Pollutants
EP-PP08	Coal Crusher #1	PM, PM ₁₀
EP-PP09	Coal Crusher #2	PM, PM ₁₀
EP-PP10	Coal Silo #1	PM, PM ₁₀
EP-PP11	Coal Silo #2	PM, PM ₁₀
EP-PP12	Coal Silo #3	PM, PM ₁₀
EP-PP13	Limestone Silo	PM, PM ₁₀
EP-PP30	Mini Bunker 11	PM, PM ₁₀
	Coal Crusher #3	PM, PM ₁₀
	Coal Crusher #4	PM, PM ₁₀
EP-PP48	South Conveyor Enclosure	PM, PM ₁₀
EP-PP49	Transfer Conveyor Enclosure	PM, PM ₁₀
EP-PP50	Conveyor Discharge Enclosure	PM, PM ₁₀
EP-PP40	Biomass Silo Dust Collector	PM, PM ₁₀
EP-PP41	Biomass Unloading/Conveying	PM, PM ₁₀

Potential and Actual Emissions

Potential emissions for the University of Iowa are listed in Table 8. These potential emissions in the first column are based on the PAL permits for each criteria pollutant, and the second column is without the PAL permit limits.

Table 8
Potential Emissions (PTE)

Pollutant	Potential Emissions – PAL Limits (tons/yr)	Potential Emissions – Without PAL Limits (tons/yr)	Reported 2024 Actual Emissions (tons/yr)
PM _{2.5}	85.90	190.32	18.59
PM ₁₀	97.72	213.80	20.42
PM	111.51	1076.68	21.26
SO ₂	1602.97	3748.77	47.95
NO _x	751.84	1578.24	190.19
VOC	172.75	149.49	46.71
CO	444.73	1428.19	119.00
Lead	0.52	1.00	0.02
Total HAP	165.17	151.10	13.58

Changes Made To the Title V Permit Since the Previous Issuances

General Changes

- Updated the Table of Contents
- Updated Plant-Wide Conditions
 - Updated NSPS/NESHAP-affected units lists.
 - Updated Plant-wide Applicability Limit (PAL) Requirements with current PAL permit numbers for PM/PM₁₀/PM_{2.5}/CO, as well as current equipment lists/monitoring requirements/recordkeeping requirements. For the updated PM/PM₁₀/PM_{2.5} PAL permits, an asterisk was used in the monitoring requirements section to denote which units have been removed from the PAL permit since the updated PALs have been issued. A separate list was used to denote which emission units were added since the updated PALs were issued.
 - EP-106-2 Pharmaceutical Manufacturing Process Unit #1 was added to the PAL permit for PM/PM₁₀/PM_{2.5}/VOC for recordkeeping requirements. It was assigned similar recordkeeping requirements to EP-006-4 to EP-006-7 Pharmacy Tablet Manufacturing in accordance with Condition 11.A.(3) of the PAL permits.
 - NESHAP language for ZZZZ has been updated to reflect changes from “annual” to “1 year + 30 days”.
- Updated General Conditions with current template language.
- Updated Appendix A with abbreviated links to NSPS/NESHAP regulations.
- Updated Appendix B with updated PAL permit numbers.
- Added Appendix C – Executive Order (EO10) Rules Crosswalk

Specific Changes

- Updated Equipment List

- The list of equipment in Table 9 have been removed from the Title V permit.
- The list of equipment in Table 10 have been added to the Title V permit.

Table 9
Significant Equipment Removed from the Title V Permit

Emission Point	Emission unit Description	Construction permit	Rescission Date
EP-063-1	Bioventures Center Generator	NA	8/12/2013
EP-160-20	Paint Booth at MSSB	07-A-1293	8/19/2025
EP-185-1	Water Plant Lime Conveying System	NA	10/31/2020
EP-278-1	DSB Generator	96-A-1236-S2	10/31/2024
EP-408-1	Oakdale Uplink – ITS Broadcasting Generator (125kW)	NA	7/1/2022
EP-434-6	Levitt Center Fulton Steam Boiler	NA	2/1/2020
EP-457-1	Hawkeye Tennis Water Heater	NA	11/4/2022
EP-4	Pomerantz Family Pavilion Generator	96-A-1240-S6	8/6/2025
EP-14	JCP Sterilizing Services	99-A-580	6/21/2021
EP-17	Pomerantz Family Pavilion Eye Clinic Generator	96-A-1244-S4	8/6/2025
EP-19	Roy Carver Pavilion Generator	98-A-942-S3	8/6/2025
EP-24	FPF Fuel Tank	99-A-600-S1	8/6/2025
EP-48	ETC Generator	07-A-484-S1	8/6/2025
EP-49	PFP Generator	09-A-520	8/6/2025
EP-PP56	East Campus Boiler 1	17-A-167	5/29/2020

Insignificant units removed following Facility review

EU-055-BLR-1	Obermann Center Hot Water Boiler
EU-081-BLR-1	Water Boiler (Faculty Art Studios)
EU-081-BLR-1	Faculty Art Studios Water heater
EU-195-FUR-1	Furnace
EU-195-WH-1	Water Heater
EU-446-AST-1	Hall of Fame Generator Tank

Table 10
Significant Equipment Added to the Title V Permit

Emission Point	Emission Unit Number	Emission Unit Description	Construction Permit Number
EP-055-3	EU-055-BLR-2	Obermann Center Steam Boiler #2	Exempt
EP-70	EU70-GEN-1	UIHC Centralized Emergency Power Generator 4	22-A-310
EP-71	EU71-GEN-1	UIHC Centralized Emergency Power Generator 5	22-A-311
EP-079-1	EU-079-GEN-1	Stanley Museum of Art Generator	Exempt
EP-084-1	EU-084-GEN-1	Health Sciences Academic Building NG Emergency Generator, Caterpillar Model DG500	23-A-428-S1
EP-137-1	EU-137-GEN-1	HRDP NG Emergency Generator	Exempt
EP-149-1	EU-149-GEN-1	GFWC Emergency NG Generator	Exempt
EP-185-3	EU-185-LIME-2	North Lime Bin	19-A-700
EP-185-4	EU-185-LIME-3	South Lime Bin	19-A-701
EP-240-4	EU-240-CT-3	Cooling Tower 3	25-A-059

Emission Point	Emission Unit Number	Emission Unit Description	Construction Permit Number
EP-278-2	EU-278-GEN-2	DSB 300kW NG Emergency Generator #2	22-A-444
EP-395-1	EU-395-BLR-1	Hansen Football Performance Center Boiler #1	Exempt
EP-395-2	EU-395-BLR-2	Hansen Football Performance Center Boiler #2	Exempt
EP-395-3	EU-395-BLR-3	Hansen Football Performance Center Boiler #3	Exempt
EP-422-1	EU-422-CT-1	Chilled Water Plant 4 Cooling Tower	25-A-091
EP-457-10	EU-457-GEN-1	HTRC 14kW NG Emergency Generator	Exempt
EP-674-1	EU-674-BLR-1	Boiler 1 NG and Fuel Oil 22.1 MMBtu/hr	08-A-622-S1
	EU-674-BLR-2B	Boiler 2 NG and Fuel Oil 10 MMBtu/hr	
	EU-674-BLR-3	Boiler 3 NG and Fuel Oil 10 MMBtu/hr	
EP-674-4	EU-674-GEN-1	Emergency Diesel Generator West 600 kW	96-A-557-S1
EP-674-5	EU-674-GEN-2	Emergency Diesel Generator East 800 kW	96-A-807-S1
EP-674-8	EU-674-CT-1	Cooling Tower #1	24-A-263
EP-674-9	EU-674-CT-2	Cooling Tower #2	24-A-264
EP-674-10	EU-674-CT-3	Cooling Tower #3	24-A-265
EP-674-11	EU-674-CT-4	Cooling Tower #4	24-A-266
EP-674-12	EU-674-CT-5	Cooling Towner #5	24-A-267

Plant-wide Applicability Limits (PAL) Section

Permit renewal for the PAL was due by 9/25/2025. The application was submitted on 9/18/2025. This renewal application has yet to be assigned to a DNR construction permit engineer. Changes within the PAL renewal application are not reflected in the Title V permit. Equipment lists within the PAL section of the Title V have been updated following the facility review portion of the Title V renewal process.

Main Campus Emission Point-Specific Comments

1. EP-006-1 & EP-006-2 (EU-006-GEN-1) Pharmacy Generator
 - The diesel sulfur content limit for this emission unit is limited to 0.05% in the construction permits for this unit. The Form 3.0 indicates 0.0015% sulfur for the fuel since the University only purchases this grade of fuel. Since their current enforceable limits are 0.05% this is the value that was used for PTE. The 0.0015% should be used for actual emissions calculations. This also applies to the existing emergency generators, >500 HP, grouped with EP-006-1 excluding EP-6, EP674-4 and EP-674-5
2. EP-044-1 (EU-044-GEN-1) Currier Hall Generator
 - AP-42 Table 3.4-1 and 3.4-2 cannot be used for calculating emissions from this emission unit, because the generator has a rated capacity of less than 600 bhp (536 bhp). Tables 3.3-1 and 3.3-2 were used for calculating potential emissions instead.
3. EP-2 (EU-2) General Hospital Generator
 - The operating conditions were modified to increase operating hours to 500 per 12-month rolling total. Stack characteristics were also corrected.
4. EP-674-4 & EP-674-5 (EU-674-GEN-1 & EU-674-GEN-2) West and East Emergency Diesel Generators
 - These emergency diesel generator s were not included in the previous renewal. The engines are existing units model year 1996 and are subject to the requirements of NESHAP ZZZZ. Construction permits for these units list 500ppm_v as the SO₂ emission limit. However, 2.5 lb/MMBtu is the correct limit.

5. Existing Emergency Generators (CI, <500 HP) EP-002-1 through EP-25 p.96-98
 - No changes.
6. Existing Emergency Generators (CI, <500 HP) EP-073-1 through EP-430-1 p.99-102
 - No changes.
7. New Emergency Generators (CI >500 HP) EP-435-2, EP-455-1 p.103-105
 - These units are not subject to NSPS IIII because they were constructed prior to the applicability date.
 - The diesel sulfur content limit for both emission units is limited to 0.05% in the construction permits. 0.05% sulfur was used for the PTE at EP-435-2.
8. EP-003-5 (EU-003-GEN-3) Chemistry Building Generator p.106-110
 - The installation date is 2/1/2007, the permit application date is 9/25/2006 so the model year for the engine is 2006. According to 40 CFR 60.4205(a), owners and operators of pre-2007 model year emergency stationary CI ICE with a displacement of less than 10 L/cylinder that are not fire pump engines must comply with the emission standards in Table 1 to this subpart. The standards are based on Table 1 of the NSPS and are the standards for a 2006 model year engine.
9. New Emergency Generators (CI >500 HP) EP075-1 through EP-52 p.111-115
 - Facility provided calculations for NO_x and CO used AP42 factor for EP-212-1 and EP-52. PTE was calculated using NSPS emission limits in the PTE spreadsheet because these are allowable limits.
10. EP-290-1 (EU-290-GEN-1) ITC Generator p.116-119
 - Construction permit 11-A-292-S1 was modified in 2021 to remove the control equipment. This resulted in increased emission limits for PM and added CO₂ and CO limits. Operating conditions remained the same.
 - Application PTE used AP42 for emission factors for NO_x. DNR PTE spreadsheet uses NSPS IIII emission limits because they are more stringent.
11. UIHC Centralized Emergency Generators 1-3 p.120-123
 - No changes
12. UIHC Centralized Emergency Generators 4-5 p.124-128
 - EP-70 and EP-71 are new compression ignition emergency engines permitted in 2022. These engines are subject to NSPS IIII and are limited to 500hr per 12-month rolling period.
13. EP-046-4 (EU-046-GEN-2) IMU Generator
 - Used NSPS emission limit for CO when calculating PTE. This is an allowable limit.
14. EP-188-1 (EU-188-GEN-1) Spence Labs Generator p.133-136
 - Utilized NSPS IIII limit for PM, PM₁₀, PM_{2.5}, NO_x and CO for this emission unit instead of AP-42 because these are enforceable limits instead of AP42 factors provided in the application.
15. EP-274-2 (EU-274-GEN-2) Slater Hall Generator
 - Same as 188-GEN-1 above.

16. EP-68 (EU68-GEN-1) UIHC Integrated Service Center Generator
 - Application PTE includes emission multipliers of 1.3 for PM and 1.5 for NO_x. These have not been included in DNR PTE because the emission standards in the NSPS do not include these.
17. Existing Emergency Generator (SI <500 HP) EP-13-1 through EP-458-1 p.141-143
 - No Changes
 - EP-439-4 (EU-439-GEN-1) NADS Natural Gas Generator
 - This emission unit is not subject to NSPS JJJJ, so the emission factors from that standard were not applied to the PTE calculations for NO_x as indicated on the Form 3.0 by the facility for this emission unit.
18. New Emergency Generators (SI > 500 HP) EP-042-3 through EP084-1 p.144-156
 - EP-042-3 (EU-042-GEN-1) Kinnick Stadium Generator
 - Utilized AP-42 emission factor for VOC and CO for this emission unit instead of the NSPS emission limit, because it is more stringent.
 - EP-084-1 (EU-084-GEN-1) Health Sciences Academic Building NG Emergency Generator p.156-159
 - New unit to this renewal. This generator is limited to 500 hr total per 12-month rolling. EU-084-GEN-1 is subject to NESHAP ZZZZ and NSPS JJJJ.
19. New Emergency Generators (SI < 500 HP)
 - EP-057-1 through EP-330-1 have model years outside those subject to NSPS JJJJ so there are no additional requirements.
 - New Generators EP-149-1 and EP-457-10 were added during this renewal.
20. EP-037-1 (EU-037-GEN-1) Art Building West Generator
 - Utilized AP-42/NSPS JJJJ emission factors for this emission unit because the facility has indicated that this generator is a 4-stroke rich burn engine (SCC 20200253). Utilized AP-42 for VOC for this emission unit instead of the NSPS emission factor, because it is more stringent. Multiplied the NO_x emission calculations by 1.5 to account for a full load when the generator is run.
21. EP-068-1 (EU-068-GEN-1) CRWC Generator
 - Utilized NSPS JJJJ limit for this emission unit for NO_x instead of AP-42, because it is more stringent. Multiplied the NO_x emission calculations by 1.5 to account for a full load when the generator is run.
22. EP-439-4 (EU-439-GEN-1) NADS Natural Gas Generator
 - Application documents used a NSPS emission factor when calculating NO_x PTE. This unit is not subject to any NSPS. Webfire emission factor for SCC 20300201 was used for the PTE spreadsheet.
23. New Emergency Generators SI, > 500 HP (EP042-3 through EP-084-1)
 - EP-084-1: New unit to this renewal. 500 hr of operation per 12-month rolling period. Subject to the requirements of NSPS JJJJ.
24. New Emergency Generators SI, <500 HP (EP-037-1 through EP 457-10 and EP51 & EP-61)
 - NSPS JJJJ emission standards were used when applicable for the following units. Application documents contained some multiplier factors for NO_x of 1.5x. These were not included in the DNR PTE Spreadsheet. AP42 and Webfire emission factors represent the other values used for calculating PTE for these units.

25. EP-079-1 (Stanley Museum of Art Generator)
- New unit to this renewal.
26. EP-137-1 (EU-137-GEN-1) HRDP NG Emergency Generator
- New unit to this renewal
27. EP-51 (EU51-1) Aircare Generator
- Utilized AP-42 emission factors for this emission unit for SCC 20200253.
28. EP-278-2 (EU-279-GEN-2)
- New unit to this renewal.
29. EP-15 (EU15-1) Boyd Tower Paint Booth
- 9.20lb/gal solids was used as the emission factor for PM. The paint booth is limited to 1,282 gal per 12-month rolling period.
 - The required agency O&M has been changed to Monthly. This booth is used for maintenance painting using aerosol paint cans or roll on paint. The spray gun is not used anymore. Painting is done infrequently depending on maintenance needs of the main hospital.
30. Pharmacy Tablet Manufacturing
- Construction permits modified to add 3rd and 5th floor labs. Associated control equipment was updated. The emission limit was clarified in the construction permit as “Emission Point Specific” for PM and Opacity. These new units, EU 006-LAB3-1 and EU 006-LAB5-1, are not subject to NESHAP GGG.
 - Periodic monitoring suggests testing and CAM are applicable for PM when back calculating uncontrolled PTE using the emission limits and assumed control efficiencies. However, this is not a good method for calculating uncontrolled PTE because it results in totals greater than the maximum allowable throughput. AP42 factors for SCC 30508955 (talc processing/pellet drying) was used. Facility-provided calculations resulted in uncontrolled PTE well below the significant source threshold. Additional monitoring is not required. CAM does not apply.
31. Boilers and Water Heaters
- EP-055-3 (EU-055-BLR-2) Obermann Steam Boiler #2, EP-395-1 (EU-395-BLR-1), EP395-2 (EU-395-BLR-2), and EP-395-3 (EU-395-BLR-3) Hansen Football Performance Center Boilers #1 - #3 were added to this renewal. These boilers are subject to NESHAP DDDDD
32. EP-674-1 Boilers 1-3
- Construction permit 08-A-622-S1 was modified to replace Boiler 2A with Boiler 3. Boiler 1 capacity was updated and stack characteristics were corrected.
 - Boiler 1 is not subject to NSPS Dc because it was constructed in 1964, prior to the applicability date.
33. EP-204-1 Crematorium
- CE-204-1 afterburner control equipment is for limiting VOC emissions according to the application. No VOC emission limit is present for this unit. No Facility O&M is required for this equipment.
34. Insignificant activities
- Units EU65-UST-1 through EU67-UST-1 were listed as 1,200 gallons in the application. The facility confirmed this is a typo and 12,000 gallons is the correct capacity.

Power Plant-Specific Changes

- Updated Equipment Lists

Power Plant Emission Point-Specific Comments

1. EP-PP27 (EU-PP27) Emergency Diesel Generator
 - 2025 inspection report identified this unit as not in use and not operational. The construction permit remains active.
2. EP-240-1 (EU-240-GEN-1, EU-240-GEN-2) OREP Engines 1 and 2
 - The facility has incorrectly determined these generators to be emergency generators in their Title V application. According to the construction permit application for these units, these units are to be used full-time for non-emergency purposes.
 - Construction permit 09-A-395-S3 was modified to since the previous renewal. Changes included increased to PM/PM10, NO_x, VOC, and CO “lb/hr” emission limits. Landfill gas was removed as a permitted fuel source. Stack characteristics were also updated. Stack testing required by NESHAP ZZZZ and NSPS JJJJ was last completed on 4/30/2024 and passed. Testing was completed for Formaldehyde.
3. EP-PP52.1, EP-PP52.2, EP-PP52.3, EP-PP52.4 (EU-PP52.1, EU-PP52.2, EU-PP52.3, EU-PP52.4) Natural Gas-Fired Generators 1, 2, 3, and 4
 - Utilized the “VOC Including Formaldehyde” emission limit for these emission units for VOC as opposed to only the VOC limit.
 - Engine Forms from the application identified these engines as emergency. This was determined in the previous renewal as incorrect. According to the construction permit application for these units, while they are to be used for emergency back-up power to the campus, the application states that they will also be used for peak shaving or other/cost management activities. According to 40 CFR § 63.6640(f)(3), the 50 hours per year of allowed activity as an emergency generator cannot be used for peak shaving or non-emergency demand response. Therefore, the engines are considered to be non-emergency generators.
 - NESHAP ZZZZ requires testing every 3yr or 8760hr of operation. Testing was last completed on 05/04/2023, and passed for all units.
 - DNR construction permit staff clarified the 270.80 MMcf natural gas throughput limit is the total combined limit for all four generators.
4. EP-308-1 (EU-308-GEN-1) WCCWP Generator
 - Utilized NSPS IIII limit for PM, PM₁₀, PM_{2.5}, and NO_x for this emission unit instead of AP-42 as was included in the application.
5. EP-240-4 (EU-240-CT-3) Cooling Tower 3
 - New unit to this renewal. Construction permit 25-A-059 established emission limits for PM, PM10, and PM2.5.
 - The owner/operator shall not use any biocides or additives that contain VOC or HAP in this cooling tower.
6. EP-422-1 (EU-422-CT-1) Chilled Water Plant 4 Cooling Tower
 - New unit to this renewal. Application documents were not provided in the original application as the construction permit was issued after the Title V application was submitted. Application documents were provided 10/6/2025.

- New unit to this renewal. Construction permit 25-A-059 established emission limits for PM, PM10, and PM2.5.
 - The owner/operator shall not use any biocides or additives that contain VOC or HAP in this cooling tower.
7. EP-308-4 (EU-308-CT-3) WCCWP Cooling Tower 3
 - An updated Form 3.0 was provided in the 10/6/2025 application. This includes VOC emissions totals.
 8. EP-239-1 (EU-239-BLR) Hurst Boiler
 - Construction permit 78-A-023-S10 was updated since the previous renewal. Changes included allowing Creosote wood chips for fuel in EU-239-GSFR-1.
 - Construction permit staff clarified that the emission limits listed in construction permit 78-A-023-S10 for Boilers 2, 3, and 4 are considered a combined limit for those units.
 - Utilized AP-42 Table 1.6-2 to calculate uncontrolled PTE for the purposes of CAM and PMG for NOx, which was calculated to be 59.05 ton/yr using the worst case.
 9. EP-PP03 (EU-PP03) Boiler #7, EP-PP04 (EU-PP04) Boiler #8
 - Uncontrolled emissions for Periodic Monitoring were based on 8760 for EP-PP03 and EP-PP04 and the emission factors found on Form 3.0. PM PTE for both emission units are based on the 0.2 lb/MMBTU emission limit.
 - CEMS are required for NOx and CO2 for each emission unit.
 10. EP-PP06 (EU-PP06) Boiler #10, EP-PP07 (EU-PP07) Boiler #11
 - PP06 is not subject to NSPS because it is an existing unit constructed before 6/19/1984 applicability date.
 - Stack testing for PM10 and PM2.5 were completed on 8/5/2022 and were passing.
 - Additional stack testing is required by the PAL for PM, PM10, and PM2.5.
 - The facility requested to modify their CAM plan for the fabric filters to require monitoring only when fuels other than natural gas are combusted. Changes to the CAM plan for data representativeness section to included “for a period of 1 hour or greater”
 - Calculated Total PM and HCl PTE for EU-PP06 (Boiler #10) based on the throughput limitation of 206.30 MMBtu/hr placed by the construction permit.
 - The CE-01 form for CE-PP28 states that the controlled pollutants are PM, PM10, and PM2.5, when it should be SO2.
 - CEMs is required for NOx and CO
 11. EP-PP07 (EU-PP07) Boiler #11
 - The most recent stack testing for PM10 and CO were completed 7/31/2024 and passed.
 - Additional stack testing is required by the PAL for PM, PM10, PM2.5 and CO.
 - The CAM plan was modified to only require monitoring of the Fabric Filter when fuels other than Natural Gas are used. The acceptable pressure drop range was changed to better match normal operating conditions.

12. EP-PP43 (EU-PP43) Boiler T1, EP-PP44 (EU-PP44) Boiler T2

- Updated construction permits from construction project 25-256 were issued on 9/3/2025 to replace all boiler tubes for both boiler T1 and T2. The hourly SO₂ emission limit was removed.
- The construction permits require initial stack testing for NO_x and CO at both units.
- Calculated the PM_{2.5}, hexane, and formaldehyde PTE for these emission units based on the construction permit limitations of 77 MMBtu/hr per boiler, as opposed to the 93 MMBtu/hr maximum rated capacity.

13. EP-PP55 (EU-PP55) Boiler 12

- The construction permit for this emission unit does not have a permit limit for SO₂ or VOC as indicated on the Form 3.0 provided by the facility. The AP-42 values for natural gas combustion were used to calculate PTE for these pollutants.

14. EP-PP10 (EU-PP10) Coal Silo #1, EP-PP11 (EU-PP11) Coal Silo #2, EP-PP12 (EU-PP12) Coal Silo #3

- The SCC for these emission units are incorrect as provided on the Form 3.0's by the facility. The SCC for these emission units should be 30501008.
- Calculated the PTE for EP-PP12 based on the construction permit limit for the associated unit of 120 tons coal/hr as specified in the operating conditions, as opposed to the maximum rated capacity of 300 tons/hr on the Form 3.0.
- Uncontrolled PTE was calculated using AP42 factors for PM instead of the emission limits for each unit. Uncontrolled PM PTE does not exceed the major source threshold.

15. EP-PP13 (EU-PP13) Limestone Silo

- Construction permit 94-A-199-S1 was modified and issued 6/2/2025. These changes were captured in the renewal submitted on 10/6/2025. The construction permit was modified to replace the baghouse system. The PM₁₀ limit was removed and 0.16lb/hr was added to the PM emission limits. Opacity limit was changed from 5% to 40% which resulted in the removal of the opacity monitoring requirements listed in the previous renewal. Stack characteristics were also updated.

16. EP-PP14A (EU-PP14A) Ash Silo

- EU-PP14A was re-permitted under construction permit 23-A-006-P. This unit was previously permitted under PSD and was associated with two stacks. Now this unit vents from 1 stack, EP-PP14A.
- Opacity stack testing was completed and passed on 10/16/2023.
- Operating conditions meet the requirements of a Facility O&M plan.

17. EP-PP14B (EU-PP14B) Ash Conveying System

- Construction permit 96-A-1125-S1 was modified since the last renewal. Changes included replacement of the control equipment and increasing the max capacity. These changes resulted in a decreased PM emission limit to 0.42 lb/hr.
- Opacity stack testing was completed 10/16/2023 and passed.
- Webfire emission factor for SCC 30500619, 0.2lb/ton, was used for calculating uncontrolled PTE. These values are below the major source threshold.
- Operating conditions meet the requirements of a Facility O&M Plan.

18. EP-PP14C (EU-PP14C) Ash Silo Truck Loadout, including uncaptured emissions
 - This unit was permitted since the previous renewal and includes fugitive emission from EU-PP38F, Uncaptured Ash Silo Truck Loadout. The construction permit required opacity testing which was completed 10/17/2023 and passed.
 - Operating conditions meet the requirements of a Facility O&M Plan.
 - Weekly opacity monitoring checks are required.
19. EP-PP28 (EU-PP28) Coal Unloading Pit – Fugitive
 - Weekly visible emissions monitoring is required.
20. EP-PP30, Coal and Biomass Processing, and EP-PP48, PP49 & PP50 Conveyor Enclosures.
 - Weekly opacity monitoring has been included to ensure compliance with the lower opacity limits.
21. EP-239-4 (EU-239-DRC-1) Hurst Biomass Fuel Unloading
 - Stack testing is not recommended for this emission point based on AP42 emission factors for SCC for 30200540 of 0.25lb/ton. Operating conditions meet the requirements of a Facility O&M plan. CAM does not apply.
 - Compliance inspection report dated May 2, 2025 stated this unit has not operated for approximately 4 years.
22. EP-239-5 (EU-239-DRC-2) Ag Fuel Storage Bin
 - Operating conditions meet the requirements of a Facility O&M. Precontrol emission do not exceed major source threshold. CAM does not apply.
23. EP-PP53 (EU-PP53) Dry Sorbent Injection Silo #1, EP-PP54 (EU-PP54) Dry Sorbent Injection Silo #2
 - Calculated precontrol PTE for PM based on the WebFIRE emission factor for these emission units using SCC 30500619. Totals do not exceed major source threshold. Periodic monitoring recommends a Facility O&M. Operating conditions meet the requirements of a Facility O&M Plan.
24. EP-185-3 & EP-185-4 North and South Lime Bins
 - These units are new to the Title V permit. Both units are subject to No Visible Emissions for opacity. These units only operate when receiving limestone but do not receive limestone weekly. Opacity observations are required to be conducted during each unloading event to ensure compliance with the opacity emission limit.