# Iowa Department of Natural Resources Title V Operating Permit

Name of Permitted Facility: HyCast Foundry, LLC

Facility Location: 905 West Depot

Fairfield, IA 52556

Air Quality Operating Permit Number: 99-TV-058R4

**Expiration Date:** 

**Permit Renewal Application Deadline:** 

**EIQ Number: 92-1370** 

Facility File Number: 51-01-005

#### **Responsible Official**

Name: Mr. Larry Doran

**Title: President** 

Mailing Address: 905 West Depot, Fairfield, IA 52556

Phone #: 309-573-2171

Email: larry.doran@hycastfoundry.com

#### **Permit Contact Person for the Facility**

Name: Mr. Larry Doran

**Title: President** 

Mailing Address: 905 West Depot, Fairfield, IA 52556

Phone #: 309-573-2171

Email: larry.doran@hycastfoundry.com

This permit is issued in accordance with 567 Iowa Administrative Code Chapter 24, and is issued subject to the terms and conditions contained in this permit.

#### For the Director of the Department of Natural Resources

Marnie Stein, Supervisor of Air Operating Permits Section Date

ZLP 1 99-TV-058R4,

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## **Abbreviations**

acfm	actual cubic feet per minute
CFR	Code of Federal Regulation
CE	control equipment
CEM	continuous emission monitor
cu ft/hr	cubic feet per hour
°F	degrees Fahrenheit
EIQ	emissions inventory questionnaire
EP	emission point
EU	emission unit
gr./dscf	grains per dry standard cubic foot
	Iowa Administrative Code
IDNR	Iowa Department of Natural Resources
MVAC	motor vehicle air conditioner
NAICS	North American Industry Classification System
	new source performance standard
ppmv	parts per million by volume
lb./hr	
	pounds per million British thermal units
SCC	Source Classification Codes
scfm	standard cubic feet per minute
SIC	Standard Industrial Classification
TPY	tons per year
USEPA	United States Environmental Protection Agency
<b>Pollutants</b>	
PM	particulate matter
PM <sub>10</sub>	particulate matter ten microns or less in diameter
SO <sub>2</sub>	sulfur dioxide
NO <sub>x</sub>	nitrogen oxides
	volatile organic compound
CO	
HAP	hazardous air pollutant

## I. Facility Description and Equipment List

Facility Name: HyCast Foundry, LLC Permit Number: 99-TV-058R4

Facility Description: Gray and Ductile Iron Foundry (SIC 3321)

#### **Equipment List**

Emission Point Number Emission Unit Number		<b>Emission Unit Description</b>	IDNR Construction Permit Number
EP 101F	EU 101	Scrap Handling; Iron	
EP 201	EU 102	Cupola	92-A-474-S10
EP 240	EU 103, EU 106-Baghouse, EU 110, EU 117C, EU 130, EU 155, EU 156	Two (2) Induction Furnaces, Disa C Mold, Pour & Cool, Disa C Shakeout, Disa C Muller, Disa Sand Return, Disa A & B Muller Bin, Disa C Muller Bin	08-A-222-P1
EP 203	EU 105-Baghouse, EU 108, EU 109, EU 121	Disa A & B Mold, Pour & Cool, 20 x 26 Shakeout, Disa A & B Shakeout, 20 x 26 Automold	95-A-381-S4
EP 235-Vent	EU 105-Vent 235, EU 106-Vent 235	Disa A & B Mold, Pour & Cool, Disa C Mold, Pour & Cool	08-A-223-S1
EP 236-Vent	EU 105-Vent 236, EU 106-Vent 236	Disa A & B Mold, Pour & Cool, Disa C Mold, Pour & Cool	08-A-224-S1
EP 104F	EU 104	Manual Pour & Cool	09-A-506
EP 205	EU 107, EU 118, EU 129, EU 154	Manual Shakeout, Manual Muller, Manual Sand Return, Manual Muller Bin	88-A-014-S3
EP 111F	EU 111, EU 113, EU 114-111F	Tumbler 1; Castings, Tumbler 2; Castings, Grinding; Castings	
EP 112F	EU 112, EU 114-112F	Tumblers 3 & 4; Castings, Grinding; Castings	
EP 114F	EU 114-114F	Grinding; Castings	
EP 208	EU 117AB,	Disa A & B Muller,	95-A-380-S2

Emission Point Number	Emission Unit Number	<b>Emission Unit Description</b>	IDNR Construction Permit Number
	EU 153	Manual Dump Station	
EP 119F	EU 119	Prepared Sand Transfer	
EP 120F	EU 120	Manual Mold	
EP 122F	EU 122	Resin Sand Storage	
EP 211	EU 123	Core Sand Storage	86-A-043-S2
EP 124F	EU 124	Shell Core Making	09-A-507
EP 238-Exhaust	EU 126-Exhaust 238	Isocure Core Making	05-A-564-S2
EP 239-Exhaust	EU 126-Exhaust 239	Isocure Core Making	05-A-565-S2
EP 147F	EU 147	Haul Road; VMT	
EP 148F	EU 148	Charging Chute; Scrap	
EP 149F	EU 149	Coke Storage Pile	
EP 150F	EU 150	Limestone Storage Pile	
EP 230-Vent	EU 157-Vent 230	Metal Transfers	04-A-386
EP 231-Vent	EU 157-Vent 231	Metal Transfers	04-A-387
EP 232-Vent	EU 157-Vent 232	Metal Transfers	04-A-388
EP 233-Vent	EU 157-Vent 233	Metal Transfers	04-A-389
EP 234-Vent	EU 157-Vent 234	Metal Transfers	04-A-390
EP 158F	EU 158	Yard Traffic	
EP 159F	EU 159	Temporary Sand Storage Pile	
EP 160F	EU 160	Permanent Sand Storage Pile	
	EU 146	Tumblers 5 & 6	
	EU 161A	Autoline Cooler	
EP 161	EU 161B	Disa B Cooler	18-A-220
	EU 161C	Disa A Cooler	
	EU 161D	Disa C Cooler	
EP 152	EU 152	Emergency Generator (400 kW)	15-A-058

## **Insignificant Activities Equipment List**

Insignificant Emission Unit Number	Insignificant Emission Unit Description
140	Waste Oil Tank (1,500 gallons capacity)
141	No. 2 Distillate Tank (250 gallons capacity)
142	No. 2 Distillate Tank (250 gallons capacity)
143	No. 2 Distillate Tank (300 gallons capacity)
145A-F	6 Air Make Up Units (5.2 MMBtu/hr each)

#### **II. Plant-Wide Conditions**

Facility Name: HyCast Foundry, LLC Permit Number: 99-TV-058R4

Permit conditions are established in accord with 567 Iowa Administrative Code rule 24.108. When 567 IAC as amended May 15, 2024, and cited in this permit becomes State Implementation Plan (SIP) approved, it will supersede 567 IAC as amended February 8, 2023. Prior to May 15, 2024, all Title V rule citations in this Title V permit were found and cited in 567 IAC Chapter 22. During the period from May 15, 2024, to the date that 567 IAC as amended May 15, 2024, is approved into the SIP, both 567 IAC as amended May 15, 2024 and 567 IAC as amended February 8, 2023 form the legal basis for the applicable requirements included in this permit. A crosswalk showing the citation changes is attached to this permit in Appendix B.

#### **Permit Duration**

The term of this permit is: Five (5) years

Commencing on:

Ending on:

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 24.110 - 24.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 24.115.

#### **Emission Limits**

Unless specified otherwise in the Source Specific Conditions, the following limitations and supporting regulations apply to all emission points at this plant:

Opacity (visible emissions): 40% opacity

Authority for Requirement: 567 IAC 23.3(2)"d"

Sulfur Dioxide (SO<sub>2</sub>): 500 parts per million by volume

Authority for Requirement: 567 IAC 23.3(3)"e"

#### Particulate Matter:

No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed on or after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas, except as provided in 567 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – Chapter 24.

For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B). Authority for Requirement: 567 IAC 23.3(2)"a"

<u>Fugitive Dust:</u> Attainment and Unclassified Areas - A person shall take reasonable precautions to prevent particulate matter from becoming airborne in quantities sufficient to cause a nuisance as defined in Iowa Code section 657.1 when the person allows, causes or permits any materials to be handled, transported or stored or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved roads. Ordinary travel includes routine traffic and road maintenance activities such as scarifying, compacting, transporting road maintenance surfacing material, and scraping of the unpaved public road surface. (the preceding sentence is State Only) All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The public highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule. Reasonable precautions may include, but not be limited to, the following procedures.

- 1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
- 2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
- 3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizer or limestone.
- 4. Covering, at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
- 5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.
- 6. Reducing the speed of vehicles traveling over on-property surfaces as necessary to minimize the generation of airborne dusts.

Authority for Requirement: 567 IAC 23.3(2)"c"

#### **NSPS and NESHAP Applicability**

The emissions units of HyCast Foundry, LLC are not subject to a NSPS subpart at this time.

EU-152 is subject to the requirements of 40 CFR 63 Subpart ZZZZ, "National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines".

Authority for Requirement: 40 CFR 63 Subpart ZZZZ

567 IAC 23.1(4)"cz"

The operations at this facility are subject to the requirements of 40 CFR 63 of Subpart ZZZZZ, "National Emission Standards for Iron and Steel Foundries Area Sources". This facility is considered an existing, large foundry by definition.

Authority for Requirement: 40 CFR Part 63 Subpart ZZZZZ

567 IAC 23.1(4)"dz"

The operations at this facility are not subject to the requirements of 40 CFR, Part 63, Subpart EEEEE, "National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries". The facility has construction permits that limit the potential to emit of a single hazardous air pollutant from the facility to 9.4 tons per year and that limit the potential to emit of total hazardous air pollutants from the facility to 24.4 tons per year.

Therefore, in accordance with section 63.7681, the facility is not a major source of HAP emissions, and the requirements of Subpart EEEEE do not apply.

Authority for Requirement: 40 CFR 63 Subpart EEEEE

567 IAC 23.1(4)"de"

#### **III. Emission Point-Specific Conditions**

Facility Name: HyCast Foundry, LLC

Emission Point ID Number: EP 101F

Associated Equipment

Associated Emission Unit ID Numbers: EU 101

Emission Unit vented through this Emission Point: EU 101

Emission Unit Description: Scrap Handling; Iron
Raw Material/Fuel: Iron
Rated Capacity: 20 tons/hour

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)
The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Fugitive Dust
Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All

Authority for Requirement: 567 IAC 23.3(2)"c"

#### **Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.* 

persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive

dusts beyond the lot line of the property on which the emissions originate.

 Agency Approved Operation & Maintenance Plan Required?
 Yes □ No ☒

 Facility Maintained Operation & Maintenance Plan Required?
 Yes □ No ☒

 Compliance Assurance Monitoring (CAM) Plan Required?
 Yes □ No ☒

Authority for Requirement: 567 IAC 24.108(3)

#### **Emission Point ID Number: EP 201**

#### Associated Equipment

Associated Emission Unit ID Numbers: EU 102

Emissions Control Equipment ID Number: CE 301A, CE 312 Emissions Control Equipment Description: Baghouse, Afterburner

Emission Unit vented through this Emission Point: EU 102

Emission Unit Description: Cupola

Raw Material/Fuel: Iron Rated Capacity: 20 tons/hour

#### **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40 % (1)

Authority for Requirement: 40 CFR Part 63.10895(e)

567 IAC 23.3(2)"d"

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- (1) Opacity limits are:
- Per 567 IAC 23.3(2)"d" the limit on the stack is 40%. In addition, an exceedance of the indicator opacity of 10% will require the owner/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 DNR may require additional proof to demonstrate compliance (e.g., stack testing).
- Per 40 CFR §63.10895(e), fugitive emissions shall not be discharged to the atmosphere from the foundry operations that exhibit opacity greater than 20% on a six (6) minute average except for one (1) six (6) minute average per hour that does not exceed 30%.

Pollutant: Particulate Matter (PM) (2)

Emission Limits: 0.8 lb PM/ton of metal charged, 13.3 lb/hr, 30.63 tons/year

Authority for Requirement: 40 CFR §63.10895(c)(1)

Iowa DNR Construction Permit 92-A-474-S10

- (2) Per 40 CFR §63.10895(c)(1), emissions discharged to the atmosphere shall not exceed either:
- 0.8 lb of PM per ton of metal charged or
- 0.06 lb of total metal HAP per ton of metal charged

Pollutant: PM-10

Emission Limit(s): 4.5 lb/hr, 19.7 tons/year

Authority for Requirement: Iowa DNR Construction Permit 92-A-474-S10

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 500 ppmv, 23.7 lb/hr, 54.36 tons/year

Authority for Requirement: 567 IAC 23.3(3)

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Pollutant: Nitrogen Oxide (NOx)

Emission Limit(s): 32 lb/hr, 73.44 tons/year

Authority for Requirement: Iowa DNR Construction Permit 92-A-474-S10

Pollutant: Carbon Monoxide (CO)

Emission Limit(s): 29 lb/hr, 129.54 tons/year

Authority for Requirement: Iowa DNR Construction Permit 92-A-474-S10

Pollutant: Lead (Pb)

Emission Limit(s): 0.49 lb/hr, 1.13 tons/year

Authority for Requirement: Iowa DNR Construction Permit 92-A-474-S10

Pollutant: Manganese (Mn)

Emission Limit(s): 0.12 lb/hr, 0.276 tons/year

Authority for Requirement: Iowa DNR Construction Permit 92-A-474-S10

Pollutant: Other Single HAP

Emission Limit(s): 0.033 lb/hr, 0.075 tons/year

Authority for Requirement: Iowa DNR Construction Permit 92-A-474-S10

Pollutant: Total HAP

Emission Limit(s): 0.65 lb/hr, 1.481 tons/year

Authority for Requirement: 40 CFR 63 Subpart ZZZZZ

567 IAC 23.1(4)"dz"

Iowa DNR Construction Permit 92-A-474-S10

Pollutant: Total Metal HAP

Emission Limit(s): 0.06 lb of total metal HAP per ton of metal charged

Authority for Requirement: 40 CFR §63.10895(c)(1)

Iowa DNR Construction Permit 92-A-474-S10

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

The following subparts apply to this facility:

EU ID	Subpart	Title	Туре	State Reference (567 IAC)	Federal Reference (40 CFR)
	A	General Provisions	NA	23.1(4)	§63.1 – §63.15
102	ZZZZZ	National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries Area Sources	Existing Large Foundry	23.1(4)"dz"	§63.10880 – §63.10906

#### **Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner.

The operating requirements and associated recordkeeping for this permit shall be:

- A. The maximum sulfur (S) content of any coke used in this emission unit (EU 102) shall not exceed 0.7% by weight. The owner or operator shall record the sulfur (S) content, in percent by weight, of any coke used in this emission unit (EU 102).
- B. The maximum and routine (90% operating time) temperature of the gas stream entering the baghouse shall not exceed 500 °F and 450 °F, respectively. A temperature monitoring device shall be properly installed, calibrated, and maintained in order to continuously measure the inlet gas temperature to the baghouse (CE 301A). The owner or operator shall continuously record the inlet gas temperature to the baghouse (CE 301A).
- C. The production rate of this emission unit (EU 102) shall not exceed 91,800 tons of metal charged per twelve-month rolling period. The owner or operator shall record the amount of metal charged (in tons) in this emission unit (EU 102) on a daily basis. On a monthly basis, the owner or operator shall calculate and record the monthly and rolling 12-month total amounts of metal charged (in tons) in this emission unit (EU 102).
- D. The pressure drop across the baghouse (CE 301A) shall be between 1.5 to 8.0 inches of water column on an hourly average. The owner or operator shall collect and record the pressure drop across the baghouse (CE 301A) on an hourly basis when the emission unit (EU 102) is operating, except for normal meter maintenance, calibration and replacement, and malfunctions. A minimum of one (1) measurement shall be recorded per hour.

- E. Per 40 CFR §63.10895, the owner or operator shall comply with the pollution prevention management practices in 40 CFR §63.10885 and 40 CFR §63.10886.
- F. Per 40 CFR §63.10896, the owner or operator shall prepare and operate at all times according to a written operation and maintenance (O&M) plan for each control device for an emissions source subject to a PM, metal HAP, or opacity emissions limit in 40 CFR §63.10895. At a minimum, each plan must contain the following information:
  - (1) General facility and contact information;
  - (2) Positions responsible for inspecting, maintaining, and repairing emissions control devices which are used to comply with NESHAP Subpart ZZZZZ;
  - (3) Description of items, equipment, and conditions that will be inspected, including an inspection schedule for the items, equipment, and conditions. For baghouses that are equipped with bag leak detection system, the O&M plan must include the site-specific monitoring plan required in 40 CFR §63.10897(d)(2); and,
  - (4) Identity and estimate the quantity of the replacement parts that will be maintained in inventory.

The owner or operator may use any other O&M plan, preventative maintenance plan, or similar plan which addresses the requirements in 40 CFR §63.10896 to demonstrate compliance with the requirements of the O&M plan. Per 40 CFR §63.10896, the owner or operator shall maintain a copy of the O&M plan at the facility (plant number 51-01-005) and make it available for review upon request.

- G. Inspections of the baghouse (CE 301A) and system ductwork shall be conducted per 40 CFR \$63.10897.
- H. Per 40 CFR §63.10897(d), the owner or operator may elect to install a bag leak detection system in lieu of the baghouse inspection. If the owner or operator elects to install a bag leak detection system, the owner or operator shall install, operate, and maintain the system according to the requirements of 40 CFR §63.10897(d)(1) 40 CFR §63.10897(d)(3).
- I. The facility (plant number 51-01-005) shall:
  - (1) Do all operation and maintenance required by NESHAP Subpart ZZZZZ per 40 CFR §63.10896 not specified above; and,
  - (2) Do all monitoring required by NESHAP Subpart ZZZZZ per 40 CFR §63.10897 not specified above.
- J. The owner or operator shall keep all records as required by NESHAP Subpart ZZZZZ per 40 CFR §63.10899.

Authority for Requirement: 40 CFR 63 Subpart ZZZZZ

567 IAC 23.1(4)"dz"

Iowa DNR Construction Permit 92-A-474-S10

#### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 90 Stack Diameter (inches, dia.): 84 Exhaust Flow Rate (scfm): 40,000 Exhaust Temperature (°F): 175

Discharge Style: Vertical Unobstructed

Authority for Requirement: Iowa DNR Construction Permit 92-A-474-S10

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

#### Stack Testing

Pollutant - Particulate Matter (PM)
Stack Test to be Completed by (date): TWO YEARS OF PERMIT ISSUANCE
Test Method – 40 CFR Part 60 Appendix A, Method 5
Authority for Requirement - 567 IAC 24.108(3)

#### **Opacity Monitoring:**

A. The permitee must conduct opacity tests for fugitive emissions according to the requirements in 40 CFR 63.6(h)(5) and Table 1 of 40 CFR 63 Subpart ZZZZZ.

B. Subsequent performance tests must be conducted to demonstrate compliance with the opacity limit in 40 CFR 63.10895(e) no less frequently than every 6 months and each time a process change likely to increase fugitive emissions is made.

Authority for Requirement: 40 CFR 63.10898(h) and (i) 567 IAC 23.1(4)"dz"

Agency Approved Operation & Maintenance Plan Required?

Yes □ No ☑

Facility Maintained Operation & Maintenance Plan Required?

Yes □ No ☑

Compliance Assurance Monitoring (CAM) Plan Required?

Yes ☑ No □

Authority for Requirement: 567 IAC 24.108(3)

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#### **CAM Plan for CE 301A Baghouse**

#### **Dust collector Parameters**

Associated Emission Units: EU102, cupola

Associated Emission Point: EP201

Pollutants Controlled: PM, PM10, Lead, HAPs

#### **Applicable Requirements**

Please see construction permit 92-A-474-S10.

#### Monitoring Approach

#### **General Monitoring Guidelines**

- CAM involves the observation of control equipment compliance indicators, such as visible emissions and pressure drop. This plan defines acceptable ranges for these indicators. CAM also includes control equipment maintenance and inspections. Maintenance and inspections that will facilitate consistent control equipment operations are identified in this plan.
- Monitoring is not required during periods of time greater than one day in which the source does not operate.
- If weather prevents visible emissions monitoring, the observer will note the weather conditions on the form used to record monitoring. If an observation is necessary to meet the required weekly monitoring, at least three attempts will be made to retake the observation throughout the day. If unsuccessful that day due to weather, an observation will be made the next day the weather permits.

#### **Excursion from Compliance Indicators**

- An excursion occurs when an observed compliance indicator is outside of its defined acceptable indicator range. An excursion does not necessarily indicate a deviation or violation of applicable permit terms, conditions, and/or requirements.
- HyCast Foundry will take corrective action in accordance with the severity of the excursion. Corrective actions will begin as soon as possible, but no later than eight hours from the observation of the excursion. (Abnormal conditions discovered through equipment inspection and maintenance also require implementation of remediation within eight hours.)
- Corrective actions will result in one of the following:
  - ➤ If corrective actions return the process and control equipment operations to normal, the excursion does not result in a monitoring deviation.
  - ➤ If corrective actions do not correct the excursion or no corrective action is taken, then a monitoring deviation results.
    - For visible emissions, if corrective action does not return the observation to no visible emissions, a Method 9 observation is required to determine opacity.
    - If a Method 9 observation is made that exceeds the indicator opacity, than an indicator opacity exceedance has occurred. The indicator opacity for this emission point is 10%.

- In addition, if a Method 9 observation is made that exceeds the opacity permit limit, then a violation has also occurred.
- If corrective actions do not return the compliance indicator to its defined acceptable indicator range, HyCast Foundry will perform the following follow-up actions, *as applicable*:
  - ➤ Continue corrective actions.
  - ➤ Promptly orally report the excursion to the IDNR central office (whether or not excursion from compliance indicator range is believed to have caused excess emissions).
  - ➤ Promptly orally report the indicator opacity exceedance to field office of IDNR; within seven days of the exceedance, file a written indicator opacity exceedance report with both field office and central office (Compliance Unit) of IDNR.
  - ➤ Promptly orally report excess emissions to field office of IDNR (if due to other than startup, shutdown, or cleaning); Within seven days of the excess emissions, file a written excess emissions report with both field office and central office (Compliance Unit) of IDNR.
  - ➤ Conduct source testing within 90 days of the excursion to demonstrate compliance.
    - If the test demonstrates compliance with emission limits, HyCast Foundry will determine new indicator ranges for monitoring.
    - If the test demonstrates noncompliance with emission limits, HyCast Foundry will, within 60 days, propose a schedule to implement corrective action to bring the source into compliance and conduct source testing to demonstrate compliance.
  - ➤ Report monitoring or other deviations (operating conditions, emission limits, or reporting requirements) in IDNR semi-annual monitoring and annual compliance certification reports.

#### **Compliance Indicator Ranges**

- Visible Emissions
  - > Observation of no visible emissions.
- Differential Pressure
  - ➤ Acceptable indicator range: 1.5" to 8" W.C, due to variable frequency drive fan on cupola.

#### **Monitoring Methods**

- Daily
  - ➤ Check for dust collector differential pressure.
- Weekly
  - ➤ Observe for visible emissions during material handling of unit.
- Monthly
  - ➤ Inspect dust collector cleaning sequence.
  - > Check hopper function and performance.
- Quarterly
  - Inspect bags for leaks and wear.
- Semi-Annually

Inspect all dust collector components that are not subject to wear or plugging, including structural components, housing, ducts, and hoods.

#### Performance Criteria

#### **Data Representativeness**

An observation of visible emissions could indicate a decrease in the performance of the dust collector and potentially an increase in particulate emissions. A differential pressure not within the acceptable indicator range could indicate reduced performance by the dust collector and potentially an increase in particulate emissions.

#### **Record Keeping and Reporting (Verification of Operational Status)**

- HyCast Foundry will maintain records of the following:
  - > Daily logs of differential pressure readings.
  - ➤ Weekly logs of emissions observations and differential pressure.
  - All daily, monthly, quarterly, and semi-annually required inspections and maintenance. The date, time, and the location of the bag in relationship to the other bags must document bag replacement.
  - All corrective actions resulting from compliance indicators and inspections and maintenance.
  - Excursion, indicator opacity exceedance, and excess emissions reports.
- Records will be kept for at least five years and be available upon request.

#### **Quality Control**

- The dust collectors and their monitoring equipment will be operated and maintained according to manufacturer recommendations and/or as outlined in the above monitoring requirements.
- HyCast Foundry will maintain an adequate inventory of spare parts.

#### **Data Collection Procedures**

- Manual log entries are made based on gauge readings and the observation (or not) of visible emissions.
- Maintenance personnel record all maintenance/inspections performed on the dust collector and actions resulting from the inspections.

Authority for Requirement: 567 IAC 24.108(3)

#### **CAM Plan for CE 312 Afterburner**

#### **Dust collector Parameters**

• Associated Emission Units: EU102, cupola

Associated Emission Point: EP201
Pollutants Controlled: CO, HAPs

#### **Applicable Requirements**

Please see construction permit 92-A-474-S10.

#### Monitoring Approach

#### **General Monitoring Guidelines**

- CAM involves the observation of control equipment compliance indicators, such as the temperature in the cupola secondary combustion zone. This plan defines acceptable ranges for these indicators. CAM also includes control equipment maintenance and inspections. Maintenance and inspections that will facilitate consistent control equipment operations are identified in this plan.
- Monitoring is not required during periods of time greater than one day in which the source does not operate.

#### **Excursion from Compliance Indicators**

- An excursion occurs when an observed compliance indicator is outside of its defined acceptable indicator range. An excursion does not necessarily indicate a deviation or violation of applicable permit terms, conditions, and/or requirements.
- HyCast Foundry will take corrective action in accordance with the severity of the excursion. Corrective actions will begin as soon as possible, but no later than eight hours from the observation of the excursion. (Abnormal conditions discovered through equipment inspection and maintenance also require implementation of remediation within eight hours.)
- Corrective actions will result in one of the following:
  - ➤ If corrective actions return the process and control equipment operations to normal, the excursion does not result in a monitoring deviation.
  - ➤ If corrective actions do not correct the excursion or no corrective action is taken, then a monitoring deviation results.
  - ➤ If corrective actions do not return the compliance indicator to its defined acceptable indicator range, HyCast Foundry will perform the following follow-up actions, as applicable:
  - > Continue corrective actions.
  - ➤ Promptly orally report the excursion to the IDNR central office (whether or not excursion from compliance indicator range is believed to have caused excess emissions).
  - Promptly orally report excess emissions to field office of IDNR (if due to other than startup, shutdown, or cleaning); Within seven days of the excess emissions, file a written excess emissions report with both field office and central office (Compliance Unit) of IDNR.
  - ➤ Conduct source testing within 90 days of the excursion to demonstrate compliance.

- If the test demonstrates compliance with emission limits, HyCast Foundry will determine new indicator ranges for monitoring.
- If the test demonstrates noncompliance with emission limits, HyCast Foundry will, within 60 days, propose a schedule to implement corrective action to bring the source into compliance and conduct source testing to demonstrate compliance.
- ➤ Report monitoring or other deviations (operating conditions, emission limits, or reporting requirements) in IDNR semi-annual monitoring and annual compliance certification reports.

#### **Compliance Indicator Ranges**

- Cupola Secondary Combustion Zone Temperature
  - ➤ 1200°F to 1800 °F with a target range of 1500 °F to 1600 °F

#### **Monitoring Methods**

- Continuously
  - ➤ Operator observes temperature of secondary combustion zone. The temperature is continuously monitored electronically and alarms are set at the temperature limits based on an hourly block average.
- Weekly
  - Maintenance personnel inspect and maintain integrity and function of cupola according to established operating procedures.
  - Maintenance personnel inspect and maintain integrity and function of afterburner according to established operating procedures.

#### Performance Criteria

#### **Data Representativeness**

Measurement of the secondary combustion zone temperature is a determination of the afterburner destruction efficiency. Combustion is used in this zone of the cupola to convert pollutants into carbon dioxide and water. As such, the temperature at this location is a primary variable affecting the afterburners combustion effectiveness. Outside of a particular temperature range, combustion will be increasingly incomplete.

#### **Record Keeping and Reporting (Verification of Operational Status)**

- HyCast Foundry will maintain records of the following:
  - > Daily operator logs of temperature reading hourly block averages.
  - Weekly logs of inspection and maintenance procedures (completed work orders).
  - All corrective actions resulting from compliance indicators and inspections and maintenance.
  - Excursion and excess emissions reports.
- Records will be kept for at least five years and be available upon request.

#### **Quality Control**

- The afterburner and monitoring equipment will be operated and maintained according to manufacturer recommendations and/or as outlined in the above monitoring requirements.
- HyCast Foundry will maintain an adequate inventory of spare parts.

#### **Data Collection Procedures**

- Operators record the cupola secondary combustion zone temperature on paper logs. Operators obtain the temperature through the electronic system on the cupola that measures and displays the temperature.
- Maintenance personnel record all maintenance/inspections performed on the cupola and afterburner and actions resulting from the inspections on paper logs.

Authority for Requirement: 567 IAC 24.108(3)

#### **Emission Point ID Number: EP 240**

#### Associated Equipment

Associated Emission Unit ID Numbers: EU 103, EU 106-Baghouse, EU 110, EU 117C,

EU 130, EU 155 & EU 156

Emissions Control Equipment ID Number: CE 313 & CE 317 Emissions Control Equipment Description: Two (2) Baghouses

Emission Unit vented through this Emission Point: EU 103 Emission Unit Description: Two (2) Induction Furnaces

Raw Material/Fuel: Iron

Rated Capacity: 13.5 tons metal melt/hour (total)

Emission Unit vented through this Emission Point: EU 106 Emission Unit Description: Disa C Mold, Pour & Cool

Raw Material/Fuel: Iron

Rated Capacity: 8.7 tons metal melt/hour

Emission Unit vented through this Emission Point: EU 110

Emission Unit Description: Disa C Shakeout

Raw Material/Fuel: Metal Castings Rated Capacity: 8.7 tons/hour

Emission Unit vented through this Emission Point: EU 117C

Emission Unit Description: Disa C Muller

Raw Material/Fuel: Sand

Rated Capacity: 100 tons sand/hour

Emission Unit vented through this Emission Point: EU 130

Emission Unit Description: Disa Sand Return

Raw Material/Fuel: Sand

Rated Capacity: 185 tons sand/hour

Emission Unit vented through this Emission Point: EU 155

Emission Unit Description: Disa A & B Muller Bin

Raw Material/Fuel: Sand & Bond Rated Capacity: 140 tons/hour

Emission Unit vented through this Emission Point: EU 156

Emission Unit Description: Disa C Muller Bin

Raw Material/Fuel: Sand & Bond

Rated Capacity: 140 tons sand & bond/hour

#### **Applicable Requirements**

## BACT Emission Limits for the Induction Furnaces—EU 103 (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limits: 0 %

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 08-A-222-P1

Pollutant: Particulate Matter (PM)

Emission Limits: 0.042 lb/ton, 2.48 tons/year

Authority for Requirement: Iowa DNR Construction Permit 08-A-222-P1

Pollutant: PM-10

Emission Limit(s): 0.042 lb/ton, 2.48 tons/year

Authority for Requirement: Iowa DNR Construction Permit 08-A-222-P1

## NESHAP Emission Limits for the Induction Furnaces—EU 103 (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40 % (1)

Authority for Requirement: 40 CFR Part 63.10895(e)

567 IAC 23.3(2)"d"

- (1) Opacity limits are:
  - Per 567 IAC 23.3(2)"d", the limit on the stack is 40%. In addition, an exceedance of the indicator opacity of 10% will require the owner/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 DNR may require additional proof to demonstrate compliance (e.g., stack testing).
  - Per 40 CFR §63.10895(e), fugitive emissions shall not be discharged to the atmosphere from the foundry operations that exhibit opacity greater than 20% on a six (6) minute average except for one (1) six (6) minute average per hour that does not exceed 30%.

Pollutant: Particulate Matter (PM) (2)

Emission Limits: 0.8 lb PM/ton of metal charged Authority for Requirement: 40 CFR §63.10895(c)(1)

- (2) Per 40 CFR §63.10895(c)(1), emissions discharged to the atmosphere shall not exceed either:
  - 0.8 lb of PM per ton of metal charged or
  - 0.06 lb of total metal HAP per ton of metal charged

Pollutant: Total Metal HAP

Emission Limit(s): 0.06 lb of total metal HAP per ton of metal charged

Authority for Requirement: 40 CFR §63.10895(c)(1)

#### Emission Limits for the Stack—EP-240 (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: See Footnote (3)

Authority for Requirement: 567 IAC 23.3(2)"d"

567 IAC 23.1(4)"dz"

- (3) Opacity limits for this emission point are:
  - Per 567 IAC 23.3(2)"d", the limit on the stack is 40%. In addition, an exceedance of the indicator opacity of 10% will require the owner/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 DNR may require additional proof to demonstrate compliance (e.g., stack testing).
  - Per 40 CFR §63.10895(e), fugitive emissions shall not be discharged to the atmosphere from the foundry operations that exhibit opacity greater than 20% on a six (6) minute average except for one (1) six (6) minute average per hour that does not exceed 30%.

Pollutant: Particulate Matter (PM) - Federal

Emission Limits: See Footnote (4)

Authority for Requirement: 567 IAC 23.1(4)"dz"

(4) Per 40 CFR §63.10895(c)(1), emissions discharged to the atmosphere shall not exceed:

- 0.8 lb of PM per ton of metal charged; or
- 0.06 lb of total metal HAP per ton of metal charged.

Pollutant: Particulate Matter (PM) - State

Emission Limits: 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.4(6)

Iowa DNR Construction Permit 08-A-222-P1

Pollutant: PM-10

Emission Limit(s): 5.50 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 08-A-222-P1

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### National Emission Standards for Hazardous Air Pollutants (NESHAP):

The following subparts apply to this facility:

EU ID	Subpart	Title	Туре	State Reference (567 IAC)	Federal Reference (40 CFR)
	A	General Provisions	NA	23.1(4)	§63.1 – §63.15
EU 103	ZZZZZ	National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries Area Sources	Existing Large Foundry	23.1(4)"dz"	§63.10880 – §63.10906

#### **Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner.

- A. The pressure drop across the baghouse (CE 301A) shall be between 1.5 to 8.0 inches of water column on an hourly average. The owner or operator shall collect and record the pressure drop across the baghouse (CE 301A) on an hourly basis when the emission unit (EU 102) is operating, except for normal meter maintenance, calibration and replacement, and malfunctions. A minimum of one (1) measurement shall be recorded per hour.
- B. Per 40 CFR §63.10895, the owner or operator shall comply with the pollution prevention management practices in 40 CFR §63.10885 and 40 CFR §63.10886.
- C. Per 40 CFR §63.10896, the owner or operator shall prepare and operate at all times according to a written operation and maintenance (O&M) plan for each control device for an emissions source subject to a PM, metal HAP, or opacity emissions limit in 40 CFR §63.10895. At a minimum, each plan must contain the following information:
  - i. General facility and contact information;
  - ii. Positions responsible for inspecting, maintaining, and repairing emissions control devices which are used to comply with NESHAP Subpart ZZZZZ;
  - iii. Description of items, equipment, and conditions that will be inspected, including an inspection schedule for the items, equipment, and conditions. For baghouses that are equipped with bag leak detection system, the O&M plan must include the site-specific monitoring plan required in 40 CFR §63.10897(d)(2); and
  - iv. Identity and estimate the quantity of the replacement parts that will be maintained in inventory.

The owner or operator may use any other O&M plan, preventative maintenance plan, or similar plan which addresses the requirements in 40 CFR §63.10896 to demonstrate compliance with the requirements of the O&M plan. Per 40 CFR §63.10896, the owner or operator shall maintain a copy of the O&M plan at the facility (plant number 51-01-005) and make it available for review upon request.

- D. Inspections of the baghouse (CE 317) and system ductwork shall be conducted per 40 CFR 40 CFR §63.10897.
- E. Per 40 CFR §63.10897(d), the owner or operator may elect to install a bag leak detection system in lieu of the baghouse inspection. If the owner or operator elects to install a bag leak detection system, the owner or operator shall install, operate, and maintain the system according to the requirements of 40 CFR §63.10897(d)(1) 40 CFR §63.10897(d)(3).
- F. The facility (plant number 51-01-005) shall:
  - i. Do all operation and maintenance required by NESHAP Subpart ZZZZZ per 40 CFR §63.10896 not specified above and
  - ii. Do all monitoring required by NESHAP Subpart ZZZZZ per 40 CFR §63.10897

not specified above.

G. The owner or operator shall keep all records as required by NESHAP Subpart ZZZZZ per 40 CFR §63.10899.

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 90 Stack Opening, (inches, dia.): 72 Exhaust Flow Rate (scfm): 64,000 Exhaust Temperature (°F): 100 Discharge Style: Vertical Unobstructed

Authority for Requirement: Iowa DNR Construction Permit 08-A-222-P1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

ZLP 25 99-TV-058R4,

#### **Monitoring Requirements**

*The owner/operator of this equipment shall comply with the monitoring requirements listed below.* 

#### **Opacity Monitoring:**

A. The permitee must conduct opacity tests for fugitive emissions according to the requirements in 40 CFR 63.6(h)(5) and Table 1 of 40 CFR 63 Subpart ZZZZZ.

B. Subsequent performance tests must be conducted to demonstrate compliance with the opacity limit in 40 CFR 63.10895(e) no less frequently than every 6 months and each time a process change likely to increase fugitive emissions is made.

Authority for Requirement: 40 CFR 63.10898(h) and i 567 IAC 23.1(4)"dz"

#### **Stack Testing:**

Pollutant - Particulate Matter (PM) (1)

Stack Test to be Completed by (date): Every 5 years

Test Method – 40 CFR Part 60 Appendix A, Method 5

Authority for Requirement - 567 IAC 24.108(3)

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required?	Yes No No
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🛛 No 🗌

Authority for Requirement: 567 IAC 24.108(3)

ZLP 26 99-TV-058R4,

<sup>(1)</sup> As per §63.10898(b), The facility must conduct subsequent performance tests to demonstrate compliance with all applicable PM or total metal HAP emissions limits (shown above) for a metal melting furnace or group of all metal melting furnaces no less frequently than every 5 years and each time you elect to change an operating limit or make a process change likely to increase HAP emissions.

#### **CAM Plan for CE 313 Baghouse**

#### **Dust collector Parameters**

• Associated Emission Units: EU 106, Disa C Mold Pour and Cool, EU112, Tumblers 2 & 3, EU117C, Disa C Muller, EU130, Disa Return Sand, EU155, Disa A/B Muller Bins, EU156, Disa C Muller Bins

Associated Emission Point: EP240
Pollutants Controlled: PM, and PM10

#### **Applicable Requirements**

Iowa DNR Construction Permit 08-A-222-P1

#### Monitoring Approach

#### **General Monitoring Guidelines**

- CAM involves the observation of control equipment compliance indicators, such as visible emissions and pressure drop. This plan defines acceptable ranges for these indicators. CAM also includes control equipment maintenance and inspections. Maintenance and inspections that will facilitate consistent control equipment operations are identified in this plan.
- Monitoring is not required during periods of time greater than one day in which the source does not operate.
- If weather prevents visible emissions monitoring, the observer will note the weather conditions on the form used to record monitoring. If an observation is necessary to meet the required weekly monitoring, at least three attempts will be made to retake the observation throughout the day. If unsuccessful that day due to weather, an observation will be made the next day the weather permits.

#### **Excursion from Compliance Indicators**

- An excursion occurs when an observed compliance indicator is outside of its defined acceptable indicator range. An excursion does not necessarily indicate a deviation or violation of applicable permit terms, conditions, and/or requirements.
- HyCast Foundry will take corrective action in accordance with the severity of the excursion. Corrective actions will begin as soon as possible, but no later than eight hours from the observation of the excursion. (Abnormal conditions discovered through equipment inspection and maintenance also require implementation of remediation within eight hours.)
- Corrective actions will result in one of the following:
  - ➤ If corrective actions return the process and control equipment operations to normal, the excursion does not result in a monitoring deviation.
  - ➤ If corrective actions do not correct the excursion or no corrective action is taken, then a monitoring deviation results.
    - For visible emissions, if corrective action does not return the observation to no visible emissions, a Method 9 observation is required to determine opacity.
    - If a Method 9 observation is made that exceeds the indicator opacity, than an indicator opacity exceedance has occurred. The indicator opacity for this emission point is 0%.
    - In addition, if a Method 9 observation is made that exceeds the opacity permit limit, then a violation has also occurred.

- If corrective actions do not return the compliance indicator to its defined acceptable indicator range, HyCast Foundry will perform the following follow-up actions, *as applicable*:
  - > Continue corrective actions.
  - > Promptly orally report the excursion to the IDNR central office (whether or not excursion from compliance indicator range is believed to have caused excess emissions).
  - ➤ Promptly orally report the indicator opacity exceedance to field office of IDNR; Within seven days of the exceedance, file a written indicator opacity exceedance report with both field office and central office (Compliance Unit) of IDNR.
  - ➤ Promptly orally report excess emissions to field office of IDNR (if due to other than startup, shutdown, or cleaning); Within seven days of the excess emissions, file a written excess emissions report with both field office and central office (Compliance Unit) of IDNR.
  - ➤ Conduct source testing within 90 days of the excursion to demonstrate compliance.
    - If the test demonstrates compliance with emission limits, HyCast Foundry will determine new indicator ranges for monitoring.
    - If the test demonstrates noncompliance with emission limits, HyCast Foundry will, within 60 days, propose a schedule to implement corrective action to bring the source into compliance and conduct source testing to demonstrate compliance.
  - ➤ Report monitoring or other deviations (operating conditions, emission limits, or reporting requirements) in IDNR semi-annual monitoring and annual compliance certification reports.

#### **Compliance Indicator Ranges**

- Visible Emissions
  - Observation of no visible emissions.
- Differential Pressure
  - Acceptable indicator range: 5" to 8" W.C.

#### **Monitoring Methods**

- Daily
  - > Check for dust collector differential pressure.
- Weekly
  - ➤ Observe for visible emissions during material handling of unit.
- Monthly
  - ➤ Inspect dust collector cleaning sequence.
  - > Check hopper function and performance.
- Quarterly
  - ➤ Inspect bags for leaks and wear.
- Semi-Annually
  - ➤ Inspect all dust collector components that are not subject to wear or plugging, including structural components, housing, ducts, and hoods.

#### Performance Criteria

#### **Data Representativeness**

An observation of visible emissions could indicate a decrease in the performance of the dust collector and potentially an increase in particulate emissions. A differential pressure not within the acceptable indicator range could indicate reduced performance by the dust collector and potentially an increase in particulate emissions.

#### Record Keeping and Reporting (Verification of Operational Status)

- HyCast Foundry will maintain records of the following:
  - > Daily logs of differential pressure readings.
  - ➤ Weekly logs of emissions observations and differential pressure.
  - All daily, monthly, quarterly, and semi-annually required inspections and maintenance. The date, time, and the location of the bag in relationship to the other bags must document bag replacement.
  - ➤ All corrective actions resulting from compliance indicators and inspections and maintenance.
  - Excursion, indicator opacity exceedance, and excess emissions reports.
- Records will be kept for at least five years and be available upon request.

#### **Quality Control**

- The dust collectors and their monitoring equipment will be operated and maintained according to manufacturer recommendations and/or as outlined in the above monitoring requirements.
- HyCast Foundry will maintain an adequate inventory of spare parts.

#### **Data Collection Procedures**

- Manual log entries are made based on gauge readings and the observation (or not) of visible emissions.
- Maintenance personnel record all maintenance/inspections performed on the dust collector and actions resulting from the inspections.

Authority for Requirement: 567 IAC 24.108(3)

#### **CAM Plan for CE 317 Baghouse**

#### **Dust collector Parameters**

• Associated Emission Units: EU 103, Induction Furnaces

Associated Emission Point: EP240
Pollutants Controlled: PM and PM10

#### **Applicable Requirements**

Iowa DNR Construction Permit 08-A-222-P1

#### Monitoring Approach

#### **General Monitoring Guidelines**

- CAM involves the observation of control equipment compliance indicators, such as visible emissions and pressure drop. This plan defines acceptable ranges for these indicators. CAM also includes control equipment maintenance and inspections. Maintenance and inspections that will facilitate consistent control equipment operations are identified in this plan.
- Monitoring is not required during periods of time greater than one day in which the source does not operate.
- If weather prevents visible emissions monitoring, the observer will note the weather conditions on the form used to record monitoring. If an observation is necessary to meet the required weekly monitoring, at least three attempts will be made to retake the observation throughout the day. If unsuccessful that day due to weather, an observation will be made the next day the weather permits.

#### **Excursion from Compliance Indicators**

- An excursion occurs when an observed compliance indicator is outside of its defined acceptable indicator range. An excursion does not necessarily indicate a deviation or violation of applicable permit terms, conditions, and/or requirements.
- HyCast Foundry will take corrective action in accordance with the severity of the excursion. Corrective actions will begin as soon as possible, but no later than eight hours from the observation of the excursion. (Abnormal conditions discovered through equipment inspection and maintenance also require implementation of remediation within eight hours.)
- Corrective actions will result in one of the following:
  - If corrective actions return the process and control equipment operations to normal, the excursion does not result in a monitoring deviation.
  - ➤ If corrective actions do not correct the excursion or no corrective action is taken, then a monitoring deviation results.
    - For visible emissions, if corrective action does not return the observation to no visible emissions, a Method 9 observation is required to determine opacity.
    - If a Method 9 observation is made that exceeds the indicator opacity, than an indicator opacity exceedance has occurred. The indicator opacity for this emission point is 0%.
    - In addition, if a Method 9 observation is made that exceeds the opacity permit limit, then a violation has also occurred.
- If corrective actions do not return the compliance indicator to its defined acceptable indicator range, HyCast Foundry will perform the following follow-up actions, *as applicable*:
  - > Continue corrective actions.

- ➤ Promptly orally report the excursion to the IDNR central office (whether or not excursion from compliance indicator range is believed to have caused excess emissions).
- ➤ Promptly orally report the indicator opacity exceedance to field office of IDNR; Within seven days of the exceedance, file a written indicator opacity exceedance report with both field office and central office (Compliance Unit) of IDNR.
- ➤ Promptly orally report excess emissions to field office of IDNR (if due to other than startup, shutdown, or cleaning); Within seven days of the excess emissions, file a written excess emissions report with both field office and central office (Compliance Unit) of IDNR.
- ➤ Conduct source testing within 90 days of the excursion to demonstrate compliance.
  - If the test demonstrates compliance with emission limits, HyCast Foundry will determine new indicator ranges for monitoring.
  - If the test demonstrates noncompliance with emission limits, HyCast Foundry will, within 60 days, propose a schedule to implement corrective action to bring the source into compliance and conduct source testing to demonstrate compliance.
- ➤ Report monitoring or other deviations (operating conditions, emission limits, or reporting requirements) in IDNR semi-annual monitoring and annual compliance certification reports.

#### **Compliance Indicator Ranges**

- Visible Emissions
  - > Observation of no visible emissions.
- Differential Pressure
  - Acceptable indicator range: 2"-6" W.C.

#### **Monitoring Methods**

- Daily
  - ➤ Check for dust collector differential pressure.
- Weekly
  - ➤ Observe for visible emissions during material handling of unit.
- Monthly
  - ➤ Inspect dust collector cleaning sequence.
  - > Check hopper function and performance.
- Ouarterly
  - Inspect bags for leaks and wear.
- Semi-Annually
  - > Inspect all dust collector components that are not subject to wear or plugging, including structural components, housing, ducts, and hoods.

#### Performance Criteria

#### **Data Representativeness**

An observation of visible emissions could indicate a decrease in the performance of the dust collector and potentially an increase in particulate emissions. A differential pressure not within the acceptable indicator range could indicate reduced performance by the dust collector and potentially an increase in particulate emissions.

#### **Record Keeping and Reporting (Verification of Operational Status)**

- HyCast Foundry will maintain records of the following:
  - > Daily logs of differential pressure readings.
  - ➤ Weekly logs of emissions observations and differential pressure.
  - All daily, monthly, quarterly, and semi-annually required inspections and maintenance. The date, time, and the location of the bag in relationship to the other bags must document bag replacement.
  - ➤ All corrective actions resulting from compliance indicators and inspections and maintenance.
  - Excursion, indicator opacity exceedance, and excess emissions reports.
- Records will be kept for at least five years and be available upon request.

#### **Quality Control**

- The dust collectors and their monitoring equipment will be operated and maintained according to manufacturer recommendations and/or as outlined in the above monitoring requirements.
- HyCast Foundry will maintain an adequate inventory of spare parts.

#### **Data Collection Procedures**

- Manual log entries are made based on gauge readings and the observation (or not) of visible emissions.
- Maintenance personnel record all maintenance/inspections performed on the dust collector and actions resulting from the inspections.

Authority for Requirement: 567 IAC 24.108(3)

#### **Emission Point ID Number: EP 203**

#### **Associated Equipment**

Associated Emission Unit ID Numbers: EU 105-Baghouse, EU 108, EU 109, EU 121

Emissions Control Equipment ID Number: CE 302 Emissions Control Equipment Description: Baghouse

Emission Unit vented through this Emission Point: EU 105-Baghouse

Emission Unit Description: Disa A & B Mold, Pour & Cool

Raw Material/Fuel: Iron

Rated Capacity: 14.0 tons metal melt/hr (total for 2 lines)

Emission Unit vented through this Emission Point: EU 108

Emission Unit Description: 20 x 26 Shakeout

Raw Material/Fuel: Metal Castings

Rated Capacity: 4.0 tons/hr

Emission Unit vented through this Emission Point: EU 109

Emission Unit Description: Disa A (RS-60) & Disa B (MD-50) Shakeouts

Raw Material/Fuel: Metal Castings

Rated Capacity: 14.0 tons/hr (total for 2 Didions)

Emission Unit vented through this Emission Point: EU 121

Emission Unit Description: 20 x 26 Automold

Raw Material/Fuel: Sand Rated Capacity: 38.0 tons/hr

#### **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40 % (1)

Authority for Requirement: 40 CFR Part 63.10895(e)

567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 95-A-381-S4

(1) Opacity limits are:

- Per 567 IAC 23.3(2)"d" the limit on the stack is 40%. In addition, an exceedance of the indicator opacity of 10% will require the owner/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 DNR may require additional proof to demonstrate compliance (e.g., stack testing).
- Per 40 CFR §63.10895(e), fugitive emissions shall not be discharged to the atmosphere from the foundry operations that exhibit opacity greater than 20% on a six (6) minute average except for one (1) six (6) minute average per hour that does not exceed 30%.

Pollutant: Particulate Matter (PM)

Emission Limits: 0.05 gr/dscf, 5.57 lb/hr. Authority for Requirement: 567 IAC 23.4(6)

Iowa DNR Construction Permit 95-A-381-S4

Pollutant: PM-10

Emission Limit(s): 3.29 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 95-A-381-S4

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 500 ppmv, 0.2 lb/hr

Authority for Requirement: 567 IAC 23.3(3)"e"

Iowa DNR Construction Permit 95-A-381-S4

Pollutant: Nitrogen Oxide (NO<sub>x</sub>) Emission Limit(s): 1.4 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 95-A-381-S4

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 6.5 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 95-A-381-S4

Pollutant: Lead (Pb)

Emission Limit(s): 0.007 lb/hr, 8.19 tons/yr<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permit 95-A-381-S4

Pollutant: Manganese Compounds Emission Limit(s): 9.04 tons/yr<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permit 95-A-381-S4

Pollutant: Hexane

Emission Limit(s): 9.02 tons/yr<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permit 95-A-381-S4

Pollutant: Single HAP<sup>(3)</sup>

Emission Limit(s): 9.32 tons/yr<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permit 95-A-381-S4

Pollutant: Total HAPs

Emission Limit(s): 22.31 tons/yr<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permit 95-A-381-S4

(2) Limits apply to the following emission units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110). These limits are established to make the facility an area source of HAP emissions. The limits are combined limits for these emission units.

(3) Each individual HAP with the exception of lead compounds, manganese compounds, and hexane.

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Operating Limits**

Operating limits for these emission units shall be:

A. Mold making in these units shall be limited to a green sand binding system with a seacoal additive.

#### Reporting and Record Keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The permittee shall maintain daily records on the amount of metal poured in the Disa A & B Mold, Pour and Cool Line (EU 105), and the amount of metal processed through the shakeouts (Disa A & B, Disa C, 20x26, and Manual).
- B. The permittee shall maintain daily records on the emissions of individual and total HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (pounds).

The daily emissions of individual HAPs from the Disa A & B Mold, Pour & Cool Line (EU 105) shall be calculated by using the following equations:

 $Ebe = 0.037 \, 1 \, lb/ton \, x \, TMP$ 

Eto = 0.019 lb/ton x TMP

Efo = 0.0018 lb/ton x TMP

Etoh = 0.024 lb/ton x TMP

 $Ema = [(0.026 \text{ lb/ton } \times 3.2/100) + (0.038 \text{ lb/ton } \times 0.11/100)] \times TMP$ 

 $Etm = [(0.026 \text{ lb/ton } \times 5.08/100) + (0.038 \text{ lb/ton } \times 0.22/100)] \times TMP$ 

Where,

Ebe = pounds of benzene emitted, Eto = pounds of toluene emitted, Efo = pounds of formaldehyde emitted, Etoh = pounds of total organic HAP, Ema = pounds of manganese emitted, Etm = pounds of total metal HAP emitted

TMP = tons metal poured

0.0371 lb/ton = emission factor for benzene emissions from pouring and cooling<sup>1</sup>

0.019 lb/ton = emission factor for toluene emissions from pouring and cooling<sup>1</sup>

0.0018 lb/ton = emission factor for formaldehyde emissions from pouring and cooling<sup>1</sup>

0.024 lb/ton = emission factor for total organic HAP (excluding benzene, toluene, formaldehyde) emissions from pouring and cooling<sup>1</sup>

0.026 lb/ton = controlled PM emission factor for metal pouring<sup>2</sup>

0.038 lb/ton = controlled PM emission factor for metal cooling<sup>2</sup>

3.2 = manganese content, percentage of PM emissions from pouring<sup>3</sup>

0.11 = manganese content, percentage of PM emissions from cooling<sup>3</sup>

5.08 = total HAP metal content, percentage of PM emissions from pouring<sup>3</sup>

0.22 = total HAP metal content, percentage of PM emissions from cooling<sup>3</sup>

<sup>1</sup> From U. S. EPA's <u>National Emission Standards for Hazardous Air Pollutants</u> (NESHAP) for Iron and Steel Foundries -Background Information for Proposed Standards (EPA 453/R-02-013), December 2002, Table 5-4, (BID)

The daily emissions of Total HAP from the Disa A & B Mold, Pour and Cool Line (EU 105) shall be calculated by summing the emissions of individual HAP.

The daily emissions of individual HAPs from the Disa A & B Shakeout (EU 109), the 20 x 26 Shakeout (EU 108), the Manual Shakeout (EU 107) and the Disa C Shakeout (EU 110) shall be calculated by using the following equations:

Ebe = 0.0268 lb/ton x TMPS

Eto = 0.0221 lb/ton x TMPS

Efo = 0.0257 lb/ton x TMPS

Etoh = 0.125 lb/ton x TMPS

 $Ema = (0.30 \text{ lb/ton } \times 0.021/100) \times TMPS$ 

Etm =  $(0.30 \text{ lb/ton } \times 0.024/100) \times \text{TMPS}$ 

#### Where,

Ebe = pounds of benzene emitted, Eto = pounds of toluene emitted, Efo = pounds of formaldehyde emitted, Etoh = pounds of total organic HAP, Ema = pounds of manganese emitted, Etm = pounds of total metal HAP emitted

TMPS = total tons metal processed in shakeouts (Disa A&B, Disa C, 20x26, and Manual) each day

0.0268 lb/ton = emission factor for benzene emissions from shakeout<sup>1</sup>

0.0221 lb/ton = emission factor for toluene emissions from shakeout<sup>1</sup>

0.0257 lb/ton = emission factor for formaldehyde emissions from shakeout<sup>1</sup>

0.149 lb/ton = emission factor for total organic HAP (excluding benzene, toluene, formaldehyde) emissions from shakeout<sup>1</sup>

<sup>&</sup>lt;sup>2</sup> From BID, Table 5-6

<sup>&</sup>lt;sup>3</sup> From BID, Table 5-7

0.30 lb/ton = controlled PM emission factor for metal shakeout<sup>2</sup>

0.021 = manganese content, percentage of PM emissions from shakeout<sup>3</sup>

0.024 = total HAP metal content, percentage of PM emissions from shakeout<sup>3</sup>

<sup>1</sup> From U. S. EPA's <u>National Emission Standards for Hazardous Air Pollutants</u> (NESHAP) for Iron and Steel Foundries -Background Information for Proposed <u>Standards</u> (EPA 453/R-02-013), December 2002, Table 5-4, (BID)

The daily emissions of Total HAP from the Disa A & B Shakeout (EU 109), the 20 x 26 Shakeout (EU 108), the Manual Shakeout (EU 107) and the Disa C Shakeout (EU 110) shall be calculated by summing the emissions of individual HAP.

- C. The permittee shall maintain the following monthly records:
  - i The emission rate of each individual HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons);
  - ii The rolling, 12-month total of the emission rate of each individual HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons);
  - iii The emission rate of total HAPs from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons); and
  - iv. The rolling, 12-month total of the emission rate of total HAPs from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons).
- D. The permittee shall submit reports that identify all exceedances of the rolling 12-month emissions limitations for HAPs from Emission Limits section above. The report shall be submitted no later than 30 days from the end of the month in which the exceedance occurred.
- E. If the rolling, 12-month total of any individual HAP emissions from Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) exceeds 7.0 tons per year, the permittee shall maintain the following daily records:

<sup>&</sup>lt;sup>2</sup> From BID, Table 5-6

<sup>&</sup>lt;sup>3</sup> From BID, Table 5-7

- i. The daily emission rate of individual HAP from the emissions units.
- ii. Beginning with the first day after the emission rate of the individual HAP exceeds 7.0 tons per year, the rolling, 365-day total of the individual HAP emissions.

The permittee may return to the monthly recordkeeping required in Condition C above when the rolling 365-day total of individual HAP emissions is less than 7.0 tons. The monthly recordkeeping requirement will go back into effect beginning on the first day of the calendar month that follows the day on which individual HAP emissions are less than the 7.0 tpy threshold.

- F. If the rolling, 12-month total of total HAP emissions from Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) exceeds 17.0 tons per year, the permittee shall maintain the following daily records:
  - i. The daily emission rate of total HAPs from the emissions units.
  - ii. Beginning with the first day after the emission rate of the total HAPs exceeds 17.0 tons per year, the rolling, 365-day total of total HAP emissions.

The permittee may return to the monthly recordkeeping required in Condition C above when the rolling 365-day total of total HAP emissions is less than 17.0 tons. The monthly recordkeeping requirement will go back into effect beginning on the first day of the calendar month that follows the day on which total HAP emissions are less than the 17.0 tpy threshold.

Authority for Requirement: Iowa DNR Construction Permit 95-A-381-S4

# **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 70 Stack Opening, (inches, dia.): 60 Exhaust Flow Rate (scfm): 56,300 Exhaust Temperature (°F): 116 Discharge Style: Unobstructed vertical

Authority for Requirement: Iowa DNR Construction Permit 95-A-381-S4

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

# **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

# **Stack Testing**

Pollutant - Particulate Matter (PM)
Stack Test to be Completed by (date): TWO YEARS OF PERMIT ISSUANCE
Test Method – 40 CFR Part 60 Appendix A, Method 5

Authority for Requirement - 567 IAC 24.108(3)

Agency Approved Operation & Maintenance Plan Required? Yes \sum No \subseteq

Facility Maintained Operation & Maintenance Plan Required? Yes No 🛛

Compliance Assurance Monitoring (CAM) Plan Required?

Yes No

## **CAM Plan for CE-302 Baghouse**

#### **Dust collector Parameters**

- Associated Emission Units: EU105, Disa A and B Mold Pour and Cool, EU 108, 20x26 Shakeout, EU109, Disa A and B Shakeout, EU121, 20x26 Automold
- Associated Emission Point: EP203
- Pollutants Controlled: PM, PM10, Lead, HAPs

#### **Applicable Requirements**

Please see construction permit 95-A-381-S4.

# Monitoring Approach

# **General Monitoring Guidelines**

- CAM involves the observation of control equipment compliance indicators, such as visible emissions and pressure drop. This plan defines acceptable ranges for these indicators. CAM also includes control equipment maintenance and inspections. Maintenance and inspections that will facilitate consistent control equipment operations are identified in this plan.
- Monitoring is not required during periods of time greater than one day in which the source does not operate.
- If weather prevents visible emissions monitoring, the observer will note the weather conditions on the form used to record monitoring. If an observation is necessary to meet the required weekly monitoring, at least three attempts will be made to retake the observation throughout the day. If unsuccessful that day due to weather, an observation will be made the next day the weather permits.

#### **Excursion from Compliance Indicators**

- An excursion occurs when an observed compliance indicator is outside of its defined acceptable indicator range. An excursion does not necessarily indicate a deviation or violation of applicable permit terms, conditions, and/or requirements.
- HyCast Foundry will take corrective action in accordance with the severity of the excursion. Corrective actions will begin as soon as possible, but no later than eight hours from the observation of the excursion. (Abnormal conditions discovered through equipment inspection and maintenance also require implementation of remediation within eight hours.)
- Corrective actions will result in one of the following:
  - > If corrective actions return the process and control equipment operations to normal, the excursion does not result in a monitoring deviation.
  - ➤ If corrective actions do not correct the excursion or no corrective action is taken, then a monitoring deviation results.
    - For visible emissions, if corrective action does not return the observation to no visible emissions, a Method 9 observation is required to determine opacity.
    - If a Method 9 observation is made that exceeds the indicator opacity, than an indicator opacity exceedance has occurred. The indicator opacity for this emission point is 10%.
    - In addition, if a Method 9 observation is made that exceeds the opacity permit limit, then a violation has also occurred.

- If corrective actions do not return the compliance indicator to its defined acceptable indicator range, HyCast Foundry will perform the following follow-up actions, *as applicable*:
  - > Continue corrective actions.
  - > Promptly orally report the excursion to the IDNR central office (whether or not excursion from compliance indicator range is believed to have caused excess emissions).
  - ➤ Promptly orally report the indicator opacity exceedance to field office of IDNR; Within seven days of the exceedance, file a written indicator opacity exceedance report with both field office and central office (Compliance Unit) of IDNR.
  - ➤ Promptly orally report excess emissions to field office of IDNR (if due to other than startup, shutdown, or cleaning); Within seven days of the excess emissions, file a written excess emissions report with both field office and central office (Compliance Unit) of IDNR.
  - ➤ Conduct source testing within 90 days of the excursion to demonstrate compliance.
    - If the test demonstrates compliance with emission limits, HyCast Foundry will determine new indicator ranges for monitoring.
    - If the test demonstrates noncompliance with emission limits, HyCast Foundry will, within 60 days, propose a schedule to implement corrective action to bring the source into compliance and conduct source testing to demonstrate compliance.
  - ➤ Report monitoring or other deviations (operating conditions, emission limits, or reporting requirements) in IDNR semi-annual monitoring and annual compliance certification reports.

# **Compliance Indicator Ranges**

- Visible Emissions
  - > Observation of no visible emissions.
- Differential Pressure
  - Acceptable indicator range: 3" to 8" W.C.

#### **Monitoring Methods**

- Daily
  - > Check for dust collector differential pressure.
- Weekly
  - ➤ Observe for visible emissions during material handling of unit.
- Monthly
  - ➤ Inspect dust collector cleaning sequence.
  - > Check hopper function and performance.
- Quarterly
  - > Inspect bags for leaks and wear.
- Semi-Annually
  - Inspect all dust collector components that are not subject to wear or plugging, including structural components, housing, ducts, and hoods.

# Performance Criteria

# **Data Representativeness**

An observation of visible emissions could indicate a decrease in the performance of the dust collector and potentially an increase in particulate emissions. A differential pressure not within the acceptable indicator range could indicate reduced performance by the dust collector and potentially an increase in particulate emissions.

## Record Keeping and Reporting (Verification of Operational Status)

- HyCast Foundry will maintain records of the following:
  - > Daily logs of differential pressure readings.
  - ➤ Weekly logs of emissions observations and differential pressure.
  - All daily, monthly, quarterly, and semi-annually required inspections and maintenance. The date, time, and the location of the bag in relationship to the other bags must document bag replacement.
  - ➤ All corrective actions resulting from compliance indicators and inspections and maintenance.
  - Excursion, indicator opacity exceedance, and excess emissions reports.
- Records will be kept for at least five years and be available upon request.

#### **Quality Control**

- The dust collectors and their monitoring equipment will be operated and maintained according to manufacturer recommendations and/or as outlined in the above monitoring requirements.
- HyCast Foundry will maintain an adequate inventory of spare parts.

#### **Data Collection Procedures**

- Manual log entries are made based on gauge readings and the observation (or not) of visible emissions.
- Maintenance personnel record all maintenance/inspections performed on the dust collector and actions resulting from the inspections.

## **Emission Point ID Number: EP 235-Vent**

## Associated Equipment

Associated Emission Unit ID Numbers: EU 105-Vent 235, EU 106-Vent 235

Emission Unit vented through this Emission Point: EU 105-Vent 235

Emission Unit Description: Disa A & B Mold, Pour & Cool

Raw Material/Fuel: Iron

Rated Capacity: 14 Tons of Metal/hour

Emission Unit vented through this Emission Point: EU 106-Vent 235

Emission Unit Description: Disa C Mold, Pour & Cool

Raw Material/Fuel: Iron

Rated Capacity: 8.7 tons of Metal/hour

# **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: No VE (1)

(1) Opacity limit for this emission point is "no visible emissions".

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 08-A-223-S1

Pollutant: Particulate Matter (PM) Emission Limits: 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.4(6)

Iowa DNR Construction Permit 08-A-223-S1

Pollutant: PM-10

Emission Limit(s): 1.2 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 08-A-223-S1

Pollutant: Lead (Pb)

Emission Limit(s): 8.19 tons/yr (2)

Authority for Requirement: Iowa DNR Construction Permit 08-A-223-S1

Pollutant: Manganese Compounds Emission Limit(s): 9.04 tons/yr (2)

Authority for Requirement: Iowa DNR Construction Permit 08-A-223-S1

Pollutant: Hexane

Emission Limit(s): 9.02 tons/yr (2)

Authority for Requirement: Iowa DNR Construction Permit 08-A-223-S1

Pollutant: Single HAP (3)

Emission Limit(s): 9.32 tons/yr (2)

Authority for Requirement: Iowa DNR Construction Permit 08-A-223-S1

Pollutant: Total HAPs

Emission Limit(s): 22.31 tons/yr (2)

Authority for Requirement: Iowa DNR Construction Permit 08-A-223-S1

(2) Limits apply to the following emission units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110). These limits are established to make the facility an area source of HAP emissions. The limits are combined limits for these emission units.

(3) Each individual HAP with the exception of lead compounds, manganese compounds and hexane.

# **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

No operating limits are required for these emission units at this time.

# Reporting and Record Keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The permittee shall maintain daily records on the amount of metal poured in the Disa A & B Mold, Pour & Cool Line and the Disa C Mold Pour & Cool Line.
- B. The permittee shall maintain daily records on the emissions of individual and total HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (pounds).

The daily emissions of individual HAPs from the Disa A & B Mold, Pour & Cool Line (EU 105) and Disa C Mold, Pour & Cool Line (EU 106) shall be calculated by using the following equations:

Ebe =  $0.037 \, 1 \, \text{lb/ton x TMP}$ 

Eto = 0.019 lb/ton x TMP

Efo = 0.0018 lb/ton x TMP

Etoh = 0.024 lb/ton x TMP

 $Ema = [(0.0873 \text{ lb/ton } \times 3.2/100) + (0.29 \text{ lb/ton } \times 0.11/100)] \times TMP \times (1 - .95)$ 

Etm =  $[(0.0873 \text{ lb/ton } \times 5.08/100) + (0.29 \text{ lb/ton } \times 0.22/100)] \times \text{TMP } \times (1 - .95)$ Where,

Ebe = pounds of benzene emitted, Eto = pounds of toluene emitted, Efo = pounds of formaldehyde emitted, Ema = pounds of manganese emitted, Etm = pounds of total metal HAP emitted

TMP = daily tons of metal poured in the Disa A & B Mold, Pour & Cool Line and the Disa C Mold, Pour & Cool Line

0.0371 lb/ton = emission factor for benzene emissions from pouring and cooling<sup>1</sup>

0.019 lb/ton = emission factor for toluene emissions from pouring and cooling<sup>1</sup>

0.0018 lb/ton = emission factor for formaldehyde emissions from pouring and cooling<sup>1</sup>

0.024 lb/ton = emission factor for total organic HAP (excluding benzene, toluene, formaldehyde) emissions from pouring and cooling<sup>1</sup>

0.0873 lb/ton = uncontrolled PM emission factor for metal pouring<sup>2</sup>

0.29 lb/ton = uncontrolled PM emission factor for metal cooling<sup>2</sup>

3.2 = manganese content, percentage of PM emissions from pouring<sup>3</sup>

0.11 = manganese content, percentage of PM emissions from cooling<sup>3</sup>

5.08 = total HAP metal content, percentage of PM emissions from pouring<sup>3</sup>

0.22 = total HAP metal content, percentage of PM emissions from cooling<sup>3</sup>

0.95 = facility's estimate of capture efficiency for particulate matter emissions from pouring and cooling from Disa A & B Mold, Pour & Cool Line and the Disa C Mold, Pour & Cool Line

The daily emissions of Total HAP from the Disa A & B Mold, Pour & Cool Line (EU 105) and the Disa C Mold, Pour & Cool Line (EU 106) shall be calculated by summing the emissions of individual HAP.

# C. The permittee shall maintain the following monthly records:

- i. The emission rate of each individual HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons);
- ii. The rolling, 12-month total of the emission rate of each individual HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A &

<sup>&</sup>lt;sup>1</sup> From U. S. EPA's <u>National Emission Standards for Hazardous Air Pollutants</u> (NESHAP) for Iron and Steel Foundries -Background Information for Proposed <u>Standards</u> (EPA 453/R-02-013), December 2002, Table 5-4, (BID)

<sup>&</sup>lt;sup>2</sup> From BID, Table 5-6

<sup>&</sup>lt;sup>3</sup> From BID, Table 5-7

B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons);

- iii. The emission rate of total HAPs from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons); and
- iv. The rolling, 12-month total of the emission rate of total HAPs from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons).
- D. The permittee shall submit reports that identify all exceedances of the rolling 12-month emissions limitations for HAPs from Emission Limits section above. The report shall be submitted no later than 30 days from the end of the month in which the exceedance occurred.
- E. If the rolling, 12-month total of any individual HAP emissions from Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) exceeds 7.0 tons per year, the permittee shall maintain the following daily records:
  - i. The daily emission rate of individual HAP from the emissions units.
  - ii. Beginning with the first day after the emission rate of the individual HAP exceeds 7.0 tons per year, the rolling, 365-day total of the individual HAP emissions.

The permittee may return to the monthly recordkeeping required in Condition C above when the rolling 365-day total of individual HAP emissions is less than 7.0 tons. The monthly recordkeeping requirement will go back into effect beginning on the first day of the calendar month that follows the day on which individual HAP emissions are less than the 7.0 tpy threshold.

- F. If the rolling, 12-month total of total HAP emissions from Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) exceeds 17.0 tons per year, the permittee shall maintain the following daily records:
  - i. The daily emission rate of total HAPs from the emissions units.
  - ii. Beginning with the first day after the emission rate of the total HAPs exceeds 17.0 tons per year, the rolling, 365-day total of total HAP emissions.

The permittee may return to the monthly recordkeeping required in Condition C above when the rolling 365-day total of total HAP emissions is less than 17.0 tons. The monthly recordkeeping requirement will go back into effect beginning on the first day of the calendar month that follows the day on which total HAP emissions are less than the 17.0 tpy threshold.

Authority for Requirement: Iowa DNR Construction Permit 08-A-223-S1

#### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 41 Stack Diameter (inches, dia.): 52.8 Exhaust Flow Rate (scfm): 33,500 Exhaust Temperature (°F): 70

Discharge Style: Unobstructed vertical

Authority for Requirement: Iowa DNR Construction Permit 08-A-223-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

#### Opacity Monitoring:

A. The permitee must conduct opacity tests for fugitive emissions according to the requirements in 40 CFR 63.6(h)(5) and Table 1 of 40 CFR 63 Subpart ZZZZZ.

B. Subsequent performance tests must be conducted to demonstrate compliance with the opacity limit in 40 CFR 63.10895(e) no less frequently than every 6 months and each time a process change likely to increase fugitive emissions is made.

Authority for Requirement: 40 CFR 63.10898(h) and i 567 IAC 23.1(4)"dz"

Agency Approved Operation & Maintenance Plan Required?

Facility Maintained Operation & Maintenance Plan Required?

Yes □ No ⋈

Compliance Assurance Monitoring (CAM) Plan Required?

Yes □ No ⋈

Authority for Requirement: 567 IAC 24.108(3)

# **Emission Point ID Number: EP 236-Vent**

#### Associated Equipment

Associated Emission Unit ID Numbers: EU 105-Vent 236, EU 106-Vent 236

Emission Unit vented through this Emission Point: EU 105-Vent 236

Emission Unit Description: Disa A & B Mold, Pour & Cool

Raw Material/Fuel: Iron

Rated Capacity: 14 tons of Metal/hour

Emission Unit vented through this Emission Point: EU 106-Vent 236

Emission Unit Description: Disa C Mold, Pour & Cool

Raw Material/Fuel: Iron

Rated Capacity: 8.7 tons of Metal/hour

# **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: No VE (1)

(1) Opacity limit for this emission point is "no visible emissions".

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 08-A-224-S1

Pollutant: Particulate Matter (PM) Emission Limits: 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.4(6)

Iowa DNR Construction Permit 08-A-224-S1

Pollutant: PM-10

Emission Limit(s): 1.2 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 08-A-224-S1

Pollutant: Lead (Pb)

Emission Limit(s): 8.19 tons/yr (2)

Authority for Requirement: Iowa DNR Construction Permit 08-A-224-S1

Pollutant: Manganese Compounds Emission Limit(s): 9.04 tons/yr (2)

Authority for Requirement: Iowa DNR Construction Permit 08-A-224-S1

Pollutant: Hexane

Emission Limit(s): 9.02 tons/yr<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permit 08-A-224-S1

Pollutant: Single HAP (3)

Emission Limit(s): 9.32 tons/yr<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permit 08-A-224-S1

Pollutant: Total HAPs

Emission Limit(s): 22.31 tons/yr<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permit 08-A-224-S1

(2) Limits apply to the following emission units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110). These limits are established to make the facility an area source of HAP emissions. The limits are combined limits for these emission units.

(3) Each individual HAP with the exception of lead compounds, manganese compounds and hexane.

# **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

No operating limits are required for these emission units at this time.

# Reporting and Record Keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The permittee shall maintain daily records on the amount of metal poured in the Disa A & B Mold, Pour & Cool Line and the Disa C Mold Pour & Cool Line.
- B. The permittee shall maintain daily records on the emissions of individual and total HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (pounds).

The daily emissions of individual HAPs from the Disa A & B Mold, Pour & Cool Line (EU 105) and Disa C Mold, Pour & Cool Line (EU 106) shall be calculated by using the following equations:

Ebe =  $0.037 \, 1 \, \text{lb/ton x TMP}$ 

Eto = 0.019 lb/ton x TMP

Efo = 0.0018 lb/ton x TMP

Etoh = 0.024 lb/ton x TMP

 $Ema = [(0.0873 \text{ lb/ton } \times 3.2/100) + (0.29 \text{ lb/ton } \times 0.11/100)] \times TMP \times (1 - .95)$ 

Etm =  $[(0.0873 \text{ lb/ton } \times 5.08/100) + (0.29 \text{ lb/ton } \times 0.22/100)] \times \text{TMP } \times (1 - .95)$ Where,

Ebe = pounds of benzene emitted, Eto = pounds of toluene emitted, Efo = pounds of formaldehyde emitted, Ema = pounds of manganese emitted, Etm = pounds of total metal HAP emitted

TMP = daily tons of metal poured in the Disa A & B Mold, Pour & Cool Line and the Disa C Mold, Pour & Cool Line

0.0371 lb/ton = emission factor for benzene emissions from pouring and cooling<sup>1</sup>

0.019 lb/ton = emission factor for toluene emissions from pouring and cooling<sup>1</sup>

0.0018 lb/ton = emission factor for formaldehyde emissions from pouring and cooling<sup>1</sup>

0.024 lb/ton = emission factor for total organic HAP (excluding benzene, toluene, formaldehyde) emissions from pouring and cooling<sup>1</sup>

0.0873 lb/ton = uncontrolled PM emission factor for metal pouring<sup>2</sup>

0.29 lb/ton = uncontrolled PM emission factor for metal cooling<sup>2</sup>

3.2 = manganese content, percentage of PM emissions from pouring<sup>3</sup>

0.11 = manganese content, percentage of PM emissions from cooling<sup>3</sup>

5.08 = total HAP metal content, percentage of PM emissions from pouring<sup>3</sup>

0.22 = total HAP metal content, percentage of PM emissions from cooling<sup>3</sup>

0.95 = facility's estimate of capture efficiency for particulate matter emissions from pouring and cooling from Disa A & B Mold, Pour & Cool Line and the Disa C Mold, Pour & Cool Line

The daily emissions of Total HAP from the Disa A & B Mold, Pour & Cool Line (EU 105) and the Disa C Mold, Pour & Cool Line (EU 106) shall be calculated by summing the emissions of individual HAP.

# C. The permittee shall maintain the following monthly records:

- i. The emission rate of each individual HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons);
- ii. The rolling, 12-month total of the emission rate of each individual HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A &

<sup>&</sup>lt;sup>1</sup> From U. S. EPA's <u>National Emission Standards for Hazardous Air Pollutants</u> (NESHAP) for Iron and Steel Foundries -Background Information for Proposed <u>Standards</u> (EPA 453/R-02-013), December 2002, Table 5-4, (BID)

<sup>&</sup>lt;sup>2</sup> From BID, Table 5-6

<sup>&</sup>lt;sup>3</sup> From BID, Table 5-7

- B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons);
- iii. The emission rate of total HAPs from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons); and
- iv. The rolling, 12-month total of the emission rate of total HAPs from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons).
- D. The permittee shall submit reports that identify all exceedances of the rolling 12-month emissions limitations for HAPs from Emission Limits section above. The report shall be submitted no later than 30 days from the end of the month in which the exceedance occurred.
- E. If the rolling, 12-month total of any individual HAP emissions from Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) exceeds 7.0 tons per year, the permittee shall maintain the following daily records:
  - i. The daily emission rate of individual HAP from the emissions units.
  - ii. Beginning with the first day after the emission rate of the individual HAP exceeds 7.0 tons per year, the rolling, 365-day total of the individual HAP emissions.

The permittee may return to the monthly recordkeeping required in Condition C above when the rolling 365-day total of individual HAP emissions is less than 7.0 tons. The monthly recordkeeping requirement will go back into effect beginning on the first day of the calendar month that follows the day on which individual HAP emissions are less than the 7.0 tpy threshold.

- F. If the rolling, 12-month total of total HAP emissions from Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) exceeds 17.0 tons per year, the permittee shall maintain the following daily records:
  - i. The daily emission rate of total HAPs from the emissions units.
  - ii. Beginning with the first day after the emission rate of the total HAPs exceeds 17.0 tons per year, the rolling, 365-day total of total HAP emissions.

The permittee may return to the monthly recordkeeping required in Condition C above when the rolling 365-day total of total HAP emissions is less than 17.0 tons. The monthly recordkeeping requirement will go back into effect beginning on the first day of the calendar month that follows the day on which total HAP emissions are less than the 17.0 tpy threshold.

Authority for Requirement: Iowa DNR Construction Permit 08-A-224-S1

#### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 41 Stack Diameter (inches, dia.): 52.8 Exhaust Flow Rate (scfm): 36,500 Exhaust Temperature (°F): 70

Discharge Style: Unobstructed vertical

Authority for Requirement: Iowa DNR Construction Permit 08-A-224-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

## **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

#### Opacity Monitoring:

ZLP

A. The permitee must conduct opacity tests for fugitive emissions according to the requirements in 40 CFR 63.6(h)(5) and Table 1 of 40 CFR 63 Subpart ZZZZZ.

B. Subsequent performance tests must be conducted to demonstrate compliance with the opacity limit in 40 CFR 63.10895(e) no less frequently than every 6 months and each time a process change likely to increase fugitive emissions is made.

Authority for Requirement: 40 CFR 63.10898(h) and i 567 IAC 23.1(4)"dz"

Agency Approved Operation & Maintenance Plan Required?

Facility Maintained Operation & Maintenance Plan Required?

Yes □ No ☑

Compliance Assurance Monitoring (CAM) Plan Required?

Yes □ No ☑

Authority for Requirement: 567 IAC 24.108(3)

# **Emission Point ID Number: EP 104F (Internally Vented)**

## Associated Equipment

Associated Emission Unit ID Numbers: EU 104

Emission Unit vented through this Emission Point: EU 104

Emission Unit Description: Manual Pour and Cool

Raw Material/Fuel: Metal Melt Rated Capacity: 10.92 tons/hr

# **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40 % (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 09-A-506

(1) An exceedance of the indicator opacity of 10% will require the owner/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 DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM) Emission Limits: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

Iowa DNR Construction Permit 09-A-506

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limits: 500 ppmv

Authority for Requirement: 567 IAC 23.3(3)"e"

Iowa DNR Construction Permit 09-A-506

Pollutant: Lead (Pb)

Emission Limits: 8.19 tons/yr (2)

Authority for Requirement: Iowa DNR Construction Permit 09-A-506

Pollutant: Manganese Compounds Emission Limits: 9.04 tons/yr (2)

Authority for Requirement: Iowa DNR Construction Permit 09-A-506

Pollutant: Hexane

Emission Limits: 9.02 tons/yr (2)

Authority for Requirement: Iowa DNR Construction Permit 09-A-506

Pollutant: Single HAP<sup>(3)</sup>

Emission Limits: 9.32 tons/yr (2)

Authority for Requirement: Iowa DNR Construction Permit 09-A-506

Pollutant: Total HAP

Emission Limits: 22.31 tons/y r<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permit 09-A-506

(2) Limits apply to the following emission units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110). These limits are established to make the facility an area source of HAP emissions. The limits are combined limits for these emission units.

(3) Each individual HAP with the exception of lead compounds, manganese compounds and hexane.

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

No operating limits are required for these emission units at this time.

#### Reporting and Record Keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The permittee shall maintain daily records on the amount of metal poured in the emissions unit.
- B. The permittee shall maintain daily records on the emissions of individual and total HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (pounds).

The daily emissions of individual HAPs from the Manual Pour and Cool Line (EU 104) shall be calculated by using the following equations:

Ebe =  $0.037 \, 1 \, \text{lb/ton x TMP}$ 

Eto = 0.019 lb/ton x TMP

 $E_{fo} = 0.0018 \text{ lb/ton x TMP}$ 

Etoh = 0.024 lb/ton x TMP

 $Ema = [(0.0873 \text{ lb/ton } \times 3.2/100) + (0.29 \text{ lb/ton } \times 0.11/100)] \times TMP$ 

Etm =  $[(0.0873 \text{ lb/ton } \times 5.08/100) + (0.29 \text{ lb/ton } \times 0.22/100)] \times \text{TMP}$ Where,

Ebe = pounds of benzene emitted, Eto = pounds of toluene emitted, Efo = pounds of formaldehyde emitted, Etoh = pounds of total organic HAP, Ema = pounds of manganese emitted, Etm = pounds of total metal HAP emitted

0.0371 lb/ton = emission factors for benzene emissions from pouring and cooling<sup>1</sup>

0.019 lb/ton = emission factors for toluene emissions from pouring and cooling<sup>1</sup>

0.0018 lb/ton = emission factors for formaldehyde emissions from pouring and cooling<sup>1</sup>

0.024 lb/ton = emission factor for total organic HAP (excluding benzene, toluene, formaldehyde) emissions from pouring and cooling<sup>1</sup>

0.0873 lb/ton = uncontrolled PM emission factor for metal pouring<sup>2</sup>

0.29 lb/ton = uncontrolled PM emission factor for metal cooling<sup>2</sup>

3.2 = manganese content, percentage of PM emissions from pouring<sup>3</sup>

0.11 = manganese content, percentage of PM emissions from cooling<sup>3</sup>

5.08 = total HAP metal content, percentage of PM emissions from pouring<sup>3</sup>

0.22 = total HAP metal content, percentage of PM emissions from cooling<sup>3</sup>

The daily emissions of Total HAP from the Manual Pour and Cool Line (EU 104) shall be calculated by summing the emissions of individual HAP.

#### C. The permittee shall maintain the following monthly records:

- i. The emission rate of each individual HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons);
- ii. The rolling, 12-month total of the emission rate of each individual HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons);
- iii. The emission rate of total HAPs from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure

<sup>&</sup>lt;sup>1</sup> From U. S. EPA's <u>National Emission Standards for Hazardous Air Pollutants</u> (NESHAP) for Iron and Steel Foundries -Background Information for Proposed <u>Standards</u> (EPA 453/R-02-013), December 2002, Table 5-4

<sup>&</sup>lt;sup>2</sup> From BID, Table 5-6

<sup>&</sup>lt;sup>3</sup> From BID, Table 5-7

- Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons); and
- iv. The rolling, 12-month total of the emission rate of total HAPs from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons).
- D. The permittee shall submit reports that identify all exceedances of the rolling 12-month emissions limitations for HAPs from Emission Limits section above. The report shall be submitted no later than 30 days from the end of the month in which the exceedance occurred.
- E. If the rolling, 12-month total of any individual HAP emissions from Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) exceeds 7.0 tons per year, the permittee shall maintain the following daily records:
  - i. The daily emission rate of individual HAP from the emissions units.
  - ii. Beginning with the first day after the emission rate of the individual HAP exceeds 7.0 tons per year, the rolling, 365-day total of the individual HAP emissions.

The permittee may return to the monthly recordkeeping required in Condition C above when the rolling 365-day total of individual HAP emissions is less than 7.0 tons. The monthly recordkeeping requirement will go back into effect beginning on the first day of the calendar month that follows the day on which individual HAP emissions are less than the 7.0 tpy threshold.

- F. If the rolling, 12-month total of total HAP emissions from Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) exceeds 17.0 tons per year, the permittee shall maintain the following daily records:
  - i. The daily emission rate of total HAPs from the emissions units.
  - ii. Beginning with the first day after the emission rate of the total HAPs exceeds 17.0 tons per year, the rolling, 365-day total of total HAP emissions.

The permittee may return to the monthly recordkeeping required in Condition C above when the rolling 365-day total of total HAP emissions is less than 17.0 tons. The monthly recordkeeping requirement will go back into effect beginning on the first day of the calendar month that follows the day on which total HAP emissions are less than the 17.0 tpy threshold.

Authority for Requirement: Iowa DNR Construction Permit 09-A-506

Monitoring Requirements The owner/operator of this equipment shall comply with the monitoring rebelow.	equirements listed
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 24.108(3)	

#### **Emission Point ID Number: EP 205**

# Associated Equipment

Associated Emission Unit ID Numbers: EU 107, EU 118, EU 129, EU 154

Emissions Control Equipment ID Number: CE 304 Emissions Control Equipment Description: Baghouse

Emission Unit vented through this Emission Point: EU 107

Emission Unit Description: Manual Shakeout

Raw Material/Fuel: Metal Castings Rated Capacity: 10.92 tons/hr

Emission Unit vented through this Emission Point: EU 118

Emission Unit Description: Manual Muller

Raw Material/Fuel: Sand Rated Capacity: 98 tons/hr

Emission Unit vented through this Emission Point: EU 129

Emission Unit Description: Manual Sand Return

Raw Material/Fuel: Sand Rated Capacity: 98 tons/hr

Emission Unit vented through this Emission Point: EU 154

Emission Unit Description: Manual Muller Bin

Raw Material/Fuel: Sand Rated Capacity: 140 tons/hr

# **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40 % (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 88-A-014-S3

(1) An exceedance of the indicator opacity of 10% will require the owner/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 DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM) Emission Limits: 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.4(6)

Iowa DNR Construction Permit 88-A-014-S3

Pollutant: PM-10

Emission Limit(s): 2.75 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 88-A-014-S3

Pollutant: Lead (Pb)

(1) Emission Limit(s): 8.19 tons/yr (2)

Authority for Requirement: Iowa DNR Construction Permit 88-A-014-S3

Pollutant: Manganese Compounds Emission Limit(s): 9.04 tons/yr (2)

Authority for Requirement: Iowa DNR Construction Permit 88-A-014-S3

Pollutant: Hexane

Emission Limit(s): 9.02 tons/yr (2)

Authority for Requirement: Iowa DNR Construction Permit 88-A-014-S3

Pollutant: Single HAP (3)

Emission Limit(s): 9.32 tons/yr (2)

Authority for Requirement: Iowa DNR Construction Permit 88-A-014-S3

Pollutant: Total HAPs

Emission Limit(s): 22.31 tons/yr (2)

Authority for Requirement: Iowa DNR Construction Permit 88-A-014-S3

- (1) Limits apply to the following emission units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110). These limits are established to make the facility an area source of HAP emissions. The limits are combined limits for these emission units.
- (2) Each individual HAP with the exception of lead compounds, manganese compounds and hexane.

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

No operating limits are required for these emission units at this time.

#### Reporting and Record Keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The permittee shall maintain daily records on the amount of metal processed through the Manual Shakeout (EU 107).
- B. The permittee shall maintain daily records on the emissions of individual and total HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110)

(pounds).

The daily emissions of individual HAPs from the Disa A & B Shakeout (EU 109), the 20 x 26 Shakeout (EU 108), the Manual Shakeout (EU 107) and the Disa C Shakeout (EU 110) shall be calculated by using the following equations:

Ebe = 0.0268 lb/ton x TMPS

Eto = 0.0221 lb/ton x TMPS

Efo = 0.0257 lb/ton x TMPS

Etoh = 0.125 lb/ton x TMPS

 $Ema = (0.30 \text{ lb/ton } \times 0.021/100) \times TMPS$ 

Etm =  $(0.30 \text{ lb/ton } \times 0.024/100) \times \text{TMPS}$ 

Where.

Ebe = pounds of benzene emitted, Eto = pounds of toluene emitted, Efo = pounds of formaldehyde emitted, Etoh = pounds of total organic HAP, Ema = pounds of manganese emitted, Etm = pounds of total metal HAP emitted

TMPS = total tons metal processed in shakeouts (Disa A&B, Disa C, 20x26, and Manual) each day

0.0268 lb/ton = emission factor for benzene emissions from shakeout<sup>1</sup>

0.0221 lb/ton = emission factor for toluene emissions from shakeout<sup>1</sup>

0.0257 lb/ton = emission factor for formaldehyde emissions from shakeout<sup>1</sup>

0.125 lb/ton = emission factor for total organic HAP (excluding benzene, toluene, formaldehyde) emissions from shakeout<sup>1</sup>

0.30 lb/ton = controlled PM emission factor for metal shakeout<sup>2</sup>

0.021 = manganese content, percentage of PM emissions from shakeout<sup>3</sup>

0.024 = total HAP metal content, percentage of PM emissions from shakeout<sup>3</sup>

<sup>1</sup> From U. S. EPA's <u>National Emission Standards for Hazardous Air Pollutants</u> (NESHAP) for Iron and Steel Foundries -Background Information for Proposed <u>Standards</u> (EPA 453/R-02-013), December 2002, Table 5-4, (BID)

The daily emissions of Total HAP from the Disa A & B Shakeout (EU 109), the 20 x 26 Shakeout (EU 108), the Manual Shakeout (EU 107) and the Disa C Shakeout (EU 110) shall be calculated by summing the emissions of individual HAP.

#### C. The permittee shall maintain the following monthly records:

i. The emission rate of each individual HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124),

<sup>&</sup>lt;sup>2</sup> From BID, Table 5-6

<sup>&</sup>lt;sup>3</sup> From BID, Table 5-7

- Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons);
- ii. The rolling, 12-month total of the emission rate of each individual HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons);
- iii. The emission rate of total HAPs from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons); and
- iv. The rolling, 12-month total of the emission rate of total HAPs from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons).
- D. The permittee shall submit reports that identify all exceedances of the rolling 12-month emissions limitations for HAPs from Emission Limits section above. The report shall be submitted no later than 30 days from the end of the month in which the exceedance occurred.
- E. If the rolling, 12-month total of any individual HAP emissions from Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) exceeds 7.0 tons per year, the permittee shall maintain the following daily records:
  - i. The daily emission rate of individual HAP from the emissions units.
  - ii. Beginning with the first day after the emission rate of the individual HAP exceeds 7.0 tons per year, the rolling, 365-day total of the individual HAP emissions.

The permittee may return to the monthly recordkeeping required in Condition C above when the rolling 365-day total of individual HAP emissions is less than 7.0 tons. The monthly recordkeeping requirement will go back into effect beginning on the first day of the calendar month that follows the day on which individual HAP emissions are less than the 7.0 tpy threshold.

F. If the rolling, 12-month total of total HAP emissions from Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) exceeds 17.0 tons per year, the permittee shall maintain the following daily records:

- i. The daily emission rate of total HAPs from the emissions units.
- ii. Beginning with the first day after the emission rate of the total HAPs exceeds 17.0 tons per year, the rolling, 365-day total of total HAP emissions.

The permittee may return to the monthly recordkeeping required in Condition C above when the rolling 365-day total of total HAP emissions is less than 17.0 tons. The monthly recordkeeping requirement will go back into effect beginning on the first day of the calendar month that follows the day on which total HAP emissions are less than the 17.0 tpy threshold.

Authority for Requirement: Iowa DNR Construction Permit 88-A-014-S3

# **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 83 Stack Diameter (inches, dia.): 31 Exhaust Flow Rate (scfm): 25,200 Exhaust Temperature (°F): 70

Discharge Style: Unobstructed vertical

Authority for Requirement: Iowa DNR Construction Permit 88-A-014-S3

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

#### Stack Testing

Pollutant - Particulate Matter (PM)
Stack Test to be Completed by (date): TWO YEARS OF PERMIT ISSUANCE
Test Method – 40 CFR Part 60 Appendix A, Method 5
Authority for Requirement - 567 IAC 24.108(3)

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🛛 No 🗌
Authority for Requirement: 567 IAC 24.108(3)	

# **CAM Plan for CE-304 Baghouse**

This emission point shall conform to the conditions listed below

#### **Dust collector Parameters**

• Associated Emission Units: EU 107, Shakeout, EU118, Manual Mulling, EU129, Manual Return Sand, EU154, Manual Muller Bins

Associated Emission Point: EP205Pollutants Controlled: PM, PM10

#### **Applicable Requirements**

See Iowa DNR Construction Permit 88-A-014-S3

# Monitoring Approach

## **General Monitoring Guidelines**

- CAM involves the observation of control equipment compliance indicators, such as visible emissions and pressure drop. This plan defines acceptable ranges for these indicators. CAM also includes control equipment maintenance and inspections. Maintenance and inspections that will facilitate consistent control equipment operations are identified in this plan.
- Monitoring is not required during periods of time greater than one day in which the source does not operate.
- If weather prevents visible emissions monitoring, the observer will note the weather conditions on the form used to record monitoring. If an observation is necessary to meet the required weekly monitoring, at least three attempts will be made to retake the observation throughout the day. If unsuccessful that day due to weather, an observation will be made the next day the weather permits.

#### **Excursion from Compliance Indicators**

- An excursion occurs when an observed compliance indicator is outside of its defined acceptable indicator range. An excursion does not necessarily indicate a deviation or violation of applicable permit terms, conditions, and/or requirements.
- HyCast Foundry will take corrective action in accordance with the severity of the excursion. Corrective actions will begin as soon as possible, but no later than eight hours from the observation of the excursion. (Abnormal conditions discovered through equipment inspection and maintenance also require implementation of remediation within eight hours.)
- Corrective actions will result in one of the following:
  - ➤ If corrective actions return the process and control equipment operations to normal, the excursion does not result in a monitoring deviation.
  - ➤ If corrective actions do not correct the excursion or no corrective action is taken, then a monitoring deviation results.
    - For visible emissions, if corrective action does not return the observation to no visible emissions, a Method 9 observation is required to determine opacity.
    - If a Method 9 observation is made that exceeds the indicator opacity, than an indicator opacity exceedance has occurred. The indicator opacity for this emission point is 10%.
    - In addition, if a Method 9 observation is made that exceeds the opacity permit limit, then a violation has also occurred.

- If corrective actions do not return the compliance indicator to its defined acceptable indicator range, HyCast Foundry will perform the following follow-up actions, *as applicable*:
  - > Continue corrective actions.
  - > Promptly orally report the excursion to the IDNR central office (whether or not excursion from compliance indicator range is believed to have caused excess emissions).
  - ➤ Promptly orally report the indicator opacity exceedance to field office of IDNR; Within seven days of the exceedance, file a written indicator opacity exceedance report with both field office and central office (Compliance Unit) of IDNR.
  - ➤ Promptly orally report excess emissions to field office of IDNR (if due to other than startup, shutdown, or cleaning); Within seven days of the excess emissions, file a written excess emissions report with both field office and central office (Compliance Unit) of IDNR.
  - ➤ Conduct source testing within 90 days of the excursion to demonstrate compliance.
    - If the test demonstrates compliance with emission limits, HyCast Foundry will determine new indicator ranges for monitoring.
    - If the test demonstrates noncompliance with emission limits, HyCast Foundry will, within 60 days, propose a schedule to implement corrective action to bring the source into compliance and conduct source testing to demonstrate compliance.
  - ➤ Report monitoring or other deviations (operating conditions, emission limits, or reporting requirements) in IDNR semi-annual monitoring and annual compliance certification reports.

# **Compliance Indicator Ranges**

- Visible Emissions
  - > Observation of no visible emissions.
- Differential Pressure
  - Acceptable indicator range: 5" to 8" W.C.

#### **Monitoring Methods**

- Daily
  - ➤ Check for dust collector differential pressure.
- Weekly
  - ➤ Observe for visible emissions during material handling of unit.
- Monthly
  - ➤ Inspect dust collector cleaning sequence.
  - > Check hopper function and performance.
- Quarterly
  - > Inspect bags for leaks and wear.
- Semi-Annually
  - Inspect all dust collector components that are not subject to wear or plugging, including structural components, housing, ducts, and hoods.

# Performance Criteria

# **Data Representativeness**

An observation of visible emissions could indicate a decrease in the performance of the dust collector and potentially an increase in particulate emissions. A differential pressure not within

the acceptable indicator range could indicate reduced performance by the dust collector and potentially an increase in particulate emissions.

## **Record Keeping and Reporting (Verification of Operational Status)**

- HyCast Foundry will maintain records of the following:
  - > Daily logs of differential pressure readings.
  - Weekly logs of emissions observations and differential pressure.
  - All daily, monthly, quarterly, and semi-annually required inspections and maintenance. The date, time, and the location of the bag in relationship to the other bags must document bag replacement.
  - > All corrective actions resulting from compliance indicators and inspections and maintenance.
  - Excursion, indicator opacity exceedance, and excess emissions reports.
- Records will be kept for at least five years and be available upon request.

#### **Quality Control**

- The dust collectors and their monitoring equipment will be operated and maintained according to manufacturer recommendations and/or as outlined in the above monitoring requirements.
- HyCast Foundry will maintain an adequate inventory of spare parts.

## **Data Collection Procedures**

- Manual log entries are made based on gauge readings and the observation (or not) of visible emissions.
- Maintenance personnel record all maintenance/inspections performed on the dust collector and actions resulting from the inspections.

# **Emission Point ID Number: EP 111F (Internally Vented)**

# Associated Equipment

Associated Emission Unit ID Numbers: EU 111, EU 113, EU 114-111F

Emissions Control Equipment ID Number: CE 311

Emissions Control Equipment Description: Cartridge Filter

Emission Unit vented through this Emission Point: EU 111, EU 113, EU 114-111F

Emission Unit Description: Tumbler 1; Castings

Tumbler 2; Castings Grinding; Castings

Raw Material/Fuel: Metal Castings

Rated Capacity: 9.0 tons/hr each tumbler, 6.88 tons/hr Grinding; Castings

# **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limits: 40 %

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM)

Emission Limits: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

# **Emission Point ID Number: EP 112F (Internally Vented)**

# **Associated Equipment**

Associated Emission Unit ID Numbers: EU 112, EU 114-112F

Emissions Control Equipment ID Number: CE 315

Emissions Control Equipment Description: Cartridge Filter

Emission Unit vented through this Emission Point: EU 112, EU 114-112F

Emission Unit Description: Tumblers 3 & 4; Castings

Grinding; Castings

Raw Material/Fuel: Metal Castings

Rated Capacity: 7.5 tons/hr Tumblers, 6.88 tons/hr Grinding; Castings

# **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limits: 40 %

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM) Emission Limits: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

# **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes ∐ No ⊠
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes □ No ⊠

# **Emission Point ID Number: EP 114F (Internally Vented)**

# **Associated Equipment**

Associated Emission Unit ID Numbers: EU 114-114F Emissions Control Equipment ID Number: CE 314

Emissions Control Equipment Description: Cartridge Filter

Emission Unit vented through this Emission Point: EU 114-114F

Emission Unit Description: Grinding; Castings

Raw Material/Fuel: Metal Castings

Rated Capacity: 6.88 tons/hr Grinding; Castings

# **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limits: 40 %

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM) Emission Limits: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🔛 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

#### **Emission Point ID Number: EP 208**

## Associated Equipment

Associated Emission Unit ID Numbers: EU 117AB, EU 153

Emissions Control Equipment ID Number: CE 307 Emissions Control Equipment Description: Baghouse

Emission Unit vented through this Emission Point: EU 117AB

Emission Unit Description: Disa A & B Muller

Raw Material/Fuel: Sand Rated Capacity: 70 tons/hr

Emission Unit vented through this Emission Point: EU 153

Emission Unit Description: Manual Dump Station

Raw Material/Fuel: Sand Rated Capacity: 70 tons/hr

# **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limits: 40 %<sup>(1)</sup>

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 95-A-380-S2

(1) An exceedance of the indicator opacity of 10% will require the owner/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 DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM) Emission Limits: 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.3(4)6

Iowa DNR Construction Permit 95-A-380-S2

Pollutant: PM-10

Emission Limit(s): 1.96 lbs/hr

Authority for Requirement: Iowa DNR Construction Permit 95-A-380-S2

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Operating Limits**

Operating limits for this emission unit shall be:

A. The total throughput of each emission unit listed in this permit shall not exceed 70 tons per hour.

# Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- A. The date, the total hours of operation for the emission units listed in this permit, and the total throughput of sand for the emission units listed in this permit.
- B. The total hourly sand throughput for the emission units listed in this permit.

Authority for Requirement: Iowa DNR Construction Permit 95-A-380-S2

## **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 60 Stack Diameter (inches, dia.): 24 Exhaust Flow Rate (scfm): 22,900 Exhaust Temperature (°F): 70

Discharge Style: Unobstructed vertical

Authority for Requirement: Iowa DNR Construction Permit 95-A-380-S2

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

# Monitoring Requirements The owner/operator of this equipment shall comply with the monitoring requirements listed below. Stack Testing Pollutant - Particulate Matter (PM) Stack Test to be Completed by (date): TWO YEARS OF PERMIT ISSUANCE Test Method − 40 CFR Part 60 Appendix A, Method 5 Authority for Requirement - 567 IAC 24.108(3) Agency Approved Operation & Maintenance Plan Required? Yes □ No ☑ Facility Maintained Operation & Maintenance Plan Required? Yes □ No ☑

Yes No

Authority for Requirement: 567 IAC 24.108(3)

**Compliance Assurance Monitoring (CAM) Plan Required?** 

ZLP 71 99-TV-058R4,

#### **CAM Plan for CE-307 Baghouse**

This emission point shall conform to the conditions listed below

#### **Dust collector Parameters**

- Associated Emission Units: EU 117AB, Disa A & B Muller, EU 153, Manual Dump Station
- Associated Emission Point: EP208
- Pollutants Controlled: PM, PM10

# **Applicable Requirements**

See Iowa DNR Construction Permit 95-A-380-S2

# Monitoring Approach

# **General Monitoring Guidelines**

- CAM involves the observation of control equipment compliance indicators, such as visible emissions and pressure drop. This plan defines acceptable ranges for these indicators. CAM also includes control equipment maintenance and inspections. Maintenance and inspections that will facilitate consistent control equipment operations are identified in this plan.
- Monitoring is not required during periods of time greater than one day in which the source does not operate.
- If weather prevents visible emissions monitoring, the observer will note the weather conditions on the form used to record monitoring. If an observation is necessary to meet the required weekly monitoring, at least three attempts will be made to retake the observation throughout the day. If unsuccessful that day due to weather, an observation will be made the next day the weather permits.

#### **Excursion from Compliance Indicators**

- An excursion occurs when an observed compliance indicator is outside of its defined acceptable indicator range. An excursion does not necessarily indicate a deviation or violation of applicable permit terms, conditions, and/or requirements.
- HyCast Foundry will take corrective action in accordance with the severity of the excursion. Corrective actions will begin as soon as possible, but no later than eight hours from the observation of the excursion. (Abnormal conditions discovered through equipment inspection and maintenance also require implementation of remediation within eight hours.)
- Corrective actions will result in one of the following:
  - > If corrective actions return the process and control equipment operations to normal, the excursion does not result in a monitoring deviation.
  - ➤ If corrective actions do not correct the excursion or no corrective action is taken, then a monitoring deviation results.
    - For visible emissions, if corrective action does not return the observation to no visible emissions, a Method 9 observation is required to determine opacity.
    - If a Method 9 observation is made that exceeds the indicator opacity, than an indicator opacity exceedance has occurred. The indicator opacity for this emission point is 10%.
    - In addition, if a Method 9 observation is made that exceeds the opacity permit limit, then a violation has also occurred.

- If corrective actions do not return the compliance indicator to its defined acceptable indicator range, HyCast Foundry will perform the following follow-up actions, *as applicable*:
  - > Continue corrective actions.
  - > Promptly orally report the excursion to the IDNR central office (whether or not excursion from compliance indicator range is believed to have caused excess emissions).
  - ➤ Promptly orally report the indicator opacity exceedance to field office of IDNR; Within seven days of the exceedance, file a written indicator opacity exceedance report with both field office and central office (Compliance Unit) of IDNR.
  - ➤ Promptly orally report excess emissions to field office of IDNR (if due to other than startup, shutdown, or cleaning); Within seven days of the excess emissions, file a written excess emissions report with both field office and central office (Compliance Unit) of IDNR.
  - ➤ Conduct source testing within 90 days of the excursion to demonstrate compliance.
    - If the test demonstrates compliance with emission limits, HyCast Foundry will determine new indicator ranges for monitoring.
    - If the test demonstrates noncompliance with emission limits, HyCast Foundry will, within 60 days, propose a schedule to implement corrective action to bring the source into compliance and conduct source testing to demonstrate compliance.
  - ➤ Report monitoring or other deviations (operating conditions, emission limits, or reporting requirements) in IDNR semi-annual monitoring and annual compliance certification reports.

### **Compliance Indicator Ranges**

- Visible Emissions
  - > Observation of no visible emissions.
- Differential Pressure
  - Acceptable indicator range: 5" to 8" W.C.

#### **Monitoring Methods**

- Daily
  - > Check for dust collector differential pressure.
- Weekly
  - ➤ Observe for visible emissions during material handling of unit.
- Monthly
  - ➤ Inspect dust collector cleaning sequence.
  - > Check hopper function and performance.
- Quarterly
  - ➤ Inspect bags for leaks and wear.
- Semi-Annually
  - Inspect all dust collector components that are not subject to wear or plugging, including structural components, housing, ducts, and hoods.

## Performance Criteria

## **Data Representativeness**

An observation of visible emissions could indicate a decrease in the performance of the dust collector and potentially an increase in particulate emissions. A differential pressure not within the acceptable indicator range could indicate reduced performance by the dust collector and potentially an increase in particulate emissions.

### **Record Keeping and Reporting (Verification of Operational Status)**

- HyCast Foundry will maintain records of the following:
  - > Daily logs of differential pressure readings.
  - ➤ Weekly logs of emissions observations and differential pressure.
  - All daily, monthly, quarterly, and semi-annually required inspections and maintenance. The date, time, and the location of the bag in relationship to the other bags must document bag replacement.
  - ➤ All corrective actions resulting from compliance indicators and inspections and maintenance.
  - Excursion, indicator opacity exceedance, and excess emissions reports.
- Records will be kept for at least five years and be available upon request.

### **Quality Control**

- The dust collectors and their monitoring equipment will be operated and maintained according to manufacturer recommendations and/or as outlined in the above monitoring requirements.
- HyCast Foundry will maintain an adequate inventory of spare parts.

### **Data Collection Procedures**

- Manual log entries are made based on gauge readings and the observation (or not) of visible emissions.
- Maintenance personnel record all maintenance/inspections performed on the dust collector and actions resulting from the inspections.

# **Emission Point ID Number: EP 119F (Internally Vented)**

Associated Equipment	
Associated Emission Unit ID Numbers: EU 119	
Emission Unit vented through this Emission Point: EU 119 Emission Unit Description: Prepared Sand Transfer Raw Material/Fuel: Sand Rated Capacity: 100.0 tons/hr	
Applicable Requirements	
Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.) The emissions from this emission point shall not exceed the levels specified	d below.
Pollutant: Opacity Emission Limits: 40 % Authority for Requirement: 567 IAC 23.3(2)"d"	
Pollutant: Particulate Matter (PM) Emission Limits: 0.1 gr/dscf Authority for Requirement: 567 IAC 23.3(2)"a"	
Monitoring Requirements  The owner/operator of this equipment shall comply with the monitoring rebelow.	equirements listed
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 24.108(3)	

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## **Emission Point ID Number: EP 120F (Internally Vented)**

Associated Equipment	
Associated Emission Unit ID Numbers: EU 120	
E ' ' H''	

Emission Unit vented through this Emission Point: EU 120

Emission Unit Description: Manual Mold

Raw Material/Fuel: Mold Sand Rated Capacity: 43.69 tons/hr

## **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limits: 40 %

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM) Emission Limits: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

## **Emission Point ID Number: EP 122F (Internally Vented)**

<u>Associat</u>	ted Equi	pment				
Associat	ted Emis	ssion Unit	ID Number	rs: EU	J 122	
	TT *.	. 1.1	1.41. 17		D : EH 100	

Emission Unit vented through this Emission Point: EU 122

Emission Unit Description: Resin Sand Storage

Raw Material/Fuel: Resin Sand Rated Capacity: 60.0 tons/hr

## **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limits: 40 %

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM) Emission Limits: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

### **Emission Point ID Number: EP 211**

### **Associated Equipment**

Associated Emission Unit ID Numbers: EU 123 Emissions Control Equipment ID Number: CE 309 Emissions Control Equipment Description: Bag Filter

Emission Unit vented through this Emission Point: EU 123

Emission Unit Description: Core Sand Storage

Raw Material/Fuel: Mold/Core Material

Rated Capacity: 60.00 tons/hr

## **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40 %<sup>(1)</sup>

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 86-A-043-S2

(1) An exceedance of the indicator opacity of 10% will require the owner/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 DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.4(6)

Iowa DNR Construction Permit 86-A-043-S2

Pollutant: PM-10

Emission Limit(s): 0.36 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 86-A-043-S2

### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 25

Stack Diameter (inches, dia.): 8 Exhaust Flow Rate (scfm): 800 Exhaust Temperature (°F): 70 Discharge Style: Downward

Authority for Requirement: Iowa DNR Construction Permit 86-A-043-S2

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below

### **Stack Testing**

Pollutant - Particulate Matter (PM)
Stack Test to be Completed by (date): TWO YEARS OF PERMIT ISSUANCE
Test Method – 40 CFR Part 60 Appendix A, Method 5
Authority for Requirement - 567 IAC 24.108(3)

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🛛 No 🗌
Compliance Assurance Monitoring (CAM) Plan Required?	Yes No No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

The data pertaining to the plan must be maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

ZLP 79 99-TV-058R4,

### **Emission Point ID Number: EP 124F (Internally Vented)**

### Associated Equipment

Associated Emission Unit ID Numbers: EU 124

Emission Unit vented through this Emission Point: EU 124

Emission Unit Description: Shell Core Making

Raw Material/Fuel: Sand Rated Capacity: 0.738 tons/hr

## **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40 % (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 09-A-507

(1) An exceedance of the indicator opacity of 10% will require the owner/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 DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM)

Emission Limits: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

Iowa DNR Construction Permit 09-A-507

Pollutant: Lead (Pb)

Emission Limits: 8.19 tons/yr<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permit 09-A-507

Pollutant: Manganese Compounds Emission Limits: 9.04 tons/yr<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permit 09-A-507

Pollutant: Hexane

Emission Limits: 9.02 tons/yr<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permit 09-A-507

Pollutant: Single HAP (3)

Emission Limits: 9.32 tons/yr<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permit 09-A-507

Pollutant: Total HAP

Emission Limits: 22.31 tons/yr (2)

Authority for Requirement: Iowa DNR Construction Permit 09-A-507

(2) Limits apply to the following emission units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110). These limits are established to make the facility an area source of HAP emissions. The limits are combined limits for these emission units.

(3) Each individual HAP with the exception of lead compounds, manganese compounds and hexane.

### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

No operating limits are required for these emission units at this time.

### Reporting and Record Keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The permittee shall maintain daily records on the amount of sand used in the emissions unit. A record shall be maintained on the identification, the VOC content and the HAP content of the sand used in the shell core making.
- B. The permittee shall maintain daily records on the emissions of individual and total HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (pounds).

The daily emissions of individual HAPs from the Shell Core Making (EU 124) shall be calculated by using the following equation:

Eph =  $(PC / 100) \times TS \times 2000 \times 3.6$  lbs phenol/ 100 lbs of binder chemical

Where,

Eph = pounds of phenol emitted

PC = percent resin in the core sand (e.g. 3%)

TS = tons of sand used in the core making

2000 = converts tons to pounds

3.6 lbs/100 lbs of binder chemical = Emission Factor for shell core making (phenolic-novolac flake binder system) from U. S. EPA's <u>National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries -Background Information for Proposed Standards (EPA 453/R-02-013)</u>, December 2002, Table B-6.

- C. The permittee shall maintain the following monthly records:
  - i The emission rate of each individual HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons);
  - ii The rolling, 12-month total of the emission rate of each individual HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons);
  - iii The emission rate of total HAPs from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons); and
  - iv The rolling, 12-month total of the emission rate of total HAPs from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons).
- D. The permittee shall submit reports that identify all exceedances of the rolling 12-month emissions limitations for HAPs from Emission Limits section above. The report shall be submitted no later than 30 days from the end of the month in which the exceedance occurred.
- E. If the rolling, 12-month total of any individual HAP emissions from Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) exceeds 7.0 tons per year, the permittee shall maintain the following daily records:
  - i. The daily emission rate of individual HAP from the emissions units.
  - ii. Beginning with the first day after the emission rate of the individual HAP exceeds 7.0 tons per year, the rolling, 365-day total of the individual HAP emissions.

The permittee may return to the monthly recordkeeping required in Condition C above when the rolling 365-day total of individual HAP emissions is less than 7.0 tons. The monthly recordkeeping requirement will go back into effect beginning on the first day of the calendar month that follows the day on which individual HAP emissions are less than the 7.0 tpy threshold.

F. If the rolling, 12-month total of total HAP emissions from Manual Pour and Cool Line

(EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) exceeds 17.0 tons per year, the permittee shall maintain the following daily records:

- i. The daily emission rate of total HAPs from the emissions units.
- ii. Beginning with the first day after the emission rate of the total HAPs exceeds 17.0 tons per year, the rolling, 365-day total of total HAP emissions.

The permittee may return to the monthly recordkeeping required in Condition C above, when the rolling 365-day total of total HAP emissions is less than 17.0 tons. The monthly recordkeeping requirement will go back into effect beginning on the first day of the calendar month that follows the day on which total HAP emissions are less than the 17.0 tpy threshold.

Authority for Requirement: Iowa DNR Construction Permit 09-A-507

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

### **Emission Point ID Number: EP 238 - Exhaust**

Associated Equipment

Associated Emission Unit ID Numbers: EU 126

Emission Unit vented through this Emission Point: EU 126

Emission Unit Description: Isocure Core Making

Raw Material/Fuel: Sand

Rated Capacity: 1.5 tons core sand per hour (Maximum Capacity)

## **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40 % (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 05-A-564-S2

(1) An exceedence of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM) Emission Limits: 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.4(6)

Iowa DNR Construction Permit 05-A-564-S2

Pollutant: PM-10

Emission Limit(s): 0.052 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 05-A-564-S2

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 29.45 tons/yr

Authority for Requirement: Iowa DNR Construction Permit 05-A-564-S2

Pollutant: Lead (Pb)

Emission Limit(s): 8.19 tons/yr (2)

Authority for Requirement: Iowa DNR Construction Permit 05-A-564-S2

Pollutant: Manganese Compounds Emission Limit(s): 9.04 tons/yr (2)

Authority for Requirement: Iowa DNR Construction Permit 05-A-564-S2

Pollutant: Hexane

Emission Limit(s): 9.02 tons/yr<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permit 05-A-564-S2

Pollutant: Single HAP (3)

Emission Limit(s): 9.32 tons/yr<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permit 05-A-564-S2

Pollutant: Total HAPs

Emission Limit(s): 22.31 tons/yr<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permit 05-A-564-S2

(2) Limits apply to the following emission units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110). These limits are established to make the facility an area source of HAP emissions. The limits are combined limits for these emission units.

(3) Each individual HAP with the exception of lead compounds, manganese compounds and hexane.

### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

### **Operating Limits**

Operating limits for these emission units shall be:

- A. The equipment covered by this construction permit (05-A-564-S2) includes the following core making machines: Gaylord SATB 15-5, Gaylord SATB 30-5, HS-22, HP-44, Alpha Set and the CB-22-SA machine. Installation of a new core making machine may require a modification to this permit.
- B. The amount of Isocure resin part I used in these emissions units shall not exceed 134,858 pounds in any rolling twelve-month period.
- C. The amount of Isocure resin part II used in these emissions units shall not exceed 111,060 pounds in any rolling twelve-month period.
- D. The amount of Isofast Catalyst 705 shall not exceed 16,031 pounds in any rolling twelve-month period.
- E. The amount of Zip-Slip Release Agent used shall not exceed 1000 pounds in any rolling twelve-month period. It shall be assumed that the VOC content of the Zip-Slip Release Agent is 100%.
- F. The Zip-Slip Release Agent used in the coremaking process shall not contain any HAPs (1).
- G. The catalyst used in the coremaking process shall not contain any HAPs <sup>(1)</sup>.
- H. This permit is based on information provided by the permittee that only Isocure resins (a phenolic urethane cold box binder system) shall be used in the core making machines. Prior to using other binder systems that contain HAP, the permittee shall notify the Iowa DNR, Air Quality Bureau in writing.

(1) Hazardous Air Pollutant as defined by 112(b) of the Clean Air Act. For a list of HAPs, please refer to Table A that is attached to Form 112(g) which is part of the Air Construction Permit Application or contact the Iowa DNR - Air Quality Bureau.

Authority for Requirement: Iowa DNR Construction Permit 05-A-564-S2

### Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following

- A. The permittee shall maintain a current list of all resins, catalyst and other chemicals (e.g. Zip-Slip Release Agent) in use for this emissions unit. This list shall include: material safety data sheets (MSDS), manufacturer's product specifications, and material VOC content reports for each resin, catalyst, and release agent used, showing at least the product manufacturer, product name and code, and VOC and HAP content.
- B. The permittee shall maintain the following daily records on the Isocure coremaking machines:
  - i. The amount of sand used (pounds);
  - ii. The amount of resin and catalyst used (pounds). This shall be determined in the following way:
    - a. Pounds of Total Resin = (1.6 / 100) x Pounds of Sand Where, 1.6 is the maximum percentage of total Isocure resin in the mixed sand.
    - b. Pounds of Isocure Resin Part I = (55 / 100) x Pounds of Total Resin Where, 55 is the percent of Isocure Resin Part I in the total resin.
    - c. Pounds of Isocure Resin Part II = (45/100) x Pounds of Total Resin Where, 45 is the percent of Isocure Resin Part II in the total resin.
    - d. Pounds of catalyst = 1.5 x (pounds of sand/ 2000) Where, 1.5 is the amount of catalyst used in pounds per ton of sand.
  - iii. The emission rate of each individual HAP from the Isocure coremaking machines (pounds);
  - iv. The emission rate of total HAP from the Isocure coremaking machines (pounds).
- C. The permittee shall maintain daily records on the emissions of individual and total HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (pounds).
- D. The permittee shall maintain the following monthly records:
  - i The amount of Zip-Slip Release Agent used (pounds);

- ii The rolling 12-month total of the Zip-Slip Release Agent used (pounds);
- The emission rate of each individual HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons);
- The rolling, 12-month total of the emission rate of each individual HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons);
- v The emission rate of total HAPs from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons); and
- vi The rolling, 12-month total of the emission rate of total HAPs from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons).
- E. The daily emissions of individual HAPs from the Isocure coremaking machines shall be calculated by using the following equations:

 $Eph = \sum_{i} \frac{2}{100} \times P_{i}/100 \times R_{i}$ 

Efo =  $\sum_{i} \frac{2}{100} \times FO_{i}/100 \times R_{i}$ 

 $Ena = \sum_{i} 9/100 \text{ x NA}_{i}/100 \text{ x R}_{i}$ 

 $Ecu = \sum_{i} 9/100 \ x \ CU_{i}/100 \ x \ R_{i}$ 

 $Exy = \sum_{i} -9/100 \ x \ XY_i/100 \ x \ R_i$ 

Where,

Eph = pounds of phenol emitted, Efo = pounds of formaldehyde emitted, Ena = pounds of naphthalene emitted, Ecu = pounds of cumene emitted, Exy = pounds of xylene emitted

 $P_i$  = percent (%) of phenol in resin i,  $FO_i$  = percent (%) of formaldehyde in resin i,  $NA_i$  = percent (%) of naphthalene in resin i,  $CU_i$  = percent (%) of cumene in resin i,  $XY_i$  = percent (%) of xylene in resin i.

 $R_i$  = amount of resin type i used during the day (pounds)

2 = percent of phenol and formaldehyde emitted during coremaking, from U. S. EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries -Background Information for Proposed Standards (EPA 453/R-02-013), December 2002, Table B-5

- 9 = percent of naphthalene, cumene, and xylene emitted during coremaking, from U. S. EPA's <u>National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries -Background Information for Proposed Standards (EPA 453/R-02-013)</u>, December 2002, Table B-5
- F. The permittee shall submit reports that identify all exceedances of the rolling 12-month emissions limitations for HAPs from Emission Limits section above. The report shall be submitted no later than 30 days from the end of the month in which the exceedance occurred.
- G. If the rolling, 12-month total of any individual HAP emissions from Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) exceeds 7.0 tons per year, the permittee shall maintain the following daily records:
  - i. The daily emission rate of individual HAP from the emissions units.
  - ii. Beginning with the first day after the emission rate of the individual HAP exceeds 7.0 tons per year, the rolling, 365-day total of the individual HAP emissions.

The permittee may return to the monthly recordkeeping required in Condition D above when the rolling 365-day total of individual HAP emissions is less than 7.0 tons. The monthly recordkeeping requirement will go back into effect beginning on the first day of the calendar month that follows the day on which individual HAP emissions are less than the 7.0 tpy threshold.

- H. If the rolling, 12-month total of total HAP emissions from Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) exceeds 17.0 tons per year, the permittee shall maintain the following daily records:
  - i. The daily emission rate of total HAPs from the emissions units.
  - ii. Beginning with the first day after the emission rate of the total HAPs exceeds 17.0 tons per year, the rolling, 365-day total of total HAP emissions.

The permittee may return to the monthly recordkeeping required in Condition D above when the rolling 365-day total of total HAP emissions is less than 17.0 tons. The monthly recordkeeping requirement will go back into effect beginning on the first day of the calendar month that follows the day on which total HAP emissions are less than the 17.0 tpy threshold.

Authority for Requirement: Iowa DNR Construction Permit 05-A-564-S2

#### **Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.* 

Stack Height, (ft, from the ground): 27.92

Stack Opening, (inches, dia.): 26 Exhaust Flow Rate (scfm): 4,600 Exhaust Temperature (°F): Ambient

Discharge Style: Vertical Unobstructed Discharge

Authority for Requirement: Iowa DNR Construction Permit 05-A-564-S2

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

The following equipment vents through this emission point: Six coremaking machines, Gaylord SATB 15-5, Gaylord SATB 30-5, HS-22, HP-44, CB-22-SA and the Alpha Set.

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Yes 🗌 No 🖂
Yes 🗌 No 🖂
Yes 🗌 No 🖂

### **Emission Point ID Number: EP 239 - Exhaust**

Associated Equipment

Associated Emission Unit ID Numbers: EU 126

Emission Unit vented through this Emission Point: EU 126

Emission Unit Description: Isocure Core Making

Raw Material/Fuel: Sand

Rated Capacity: 1.5 tons core sand per hour (Maximum Capacity)

## **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40 % (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 05-A-565-S2

(1) An exceedence of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM) Emission Limits: 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.4(6)

Iowa DNR Construction Permit 05-A-565-S2

Pollutant: PM-10

Emission Limit(s): 0.052 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 05-A-565-S2

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 29.45 tons/yr

Authority for Requirement: Iowa DNR Construction Permit 05-A-565-S2

Pollutant: Lead (Pb)

Emission Limit(s): 8.19 tons/yr<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permit 05-A-565-S2

Pollutant: Manganese Compounds Emission Limit(s): 9.04 tons/yr<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permit 05-A-565-S2

Pollutant: Hexane

Emission Limit(s): 9.02 tons/yr<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permit 05-A-565-S2

Pollutant: Single HAP<sup>(3)</sup>

Emission Limit(s): 9.32 tons/yr<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permit 05-A-565-S2

Pollutant: Total HAPs

Emission Limit(s): 22.31 tons/yr<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permit 05-A-565-S2

(2) Limits apply to the following emission units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110). These limits are established to make the facility an area source of HAP emissions. The limits are combined limits for these emission units.

(3) Each individual HAP with the exception of lead compounds, manganese compounds and hexane.

### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

### **Operating Limits**

Operating limits for these emission units shall be:

- A. The equipment covered by this construction permit (05-A-565-S2) includes the following core making machines: Gaylord SATB 15-5, Gaylord SATB 30-5, HS-22, HP-44, Alpha Set and the CB-22-SA machine. Installation of a new core making machine may require a modification to this permit.
- B. The amount of Isocure resin part I used in these emissions units shall not exceed 134,858 pounds in any rolling twelve-month period.
- C. The amount of Isocure resin part II used in these emissions units shall not exceed 111,060 pounds in any rolling twelve-month period.
- D. The amount of Isofast Catalyst 705 shall not exceed 16,031 pounds in any rolling twelve-month period.
- E. The amount of Zip-Slip Release Agent used shall not exceed 1000 pounds in any rolling twelve-month period. It shall be assumed that the VOC content of the Zip-Slip Release Agent is 100%.
- F. The Zip-Slip Release Agent used in the coremaking process shall not contain any HAPs (1).
- G. The catalyst used in the coremaking process shall not contain any HAPs <sup>(1)</sup>.
- H. This permit is based on information provided by the permittee that only Isocure resins (a phenolic urethane cold box binder system) shall be used in the core making machines. Prior to using other binder systems that contain HAP, the permittee shall notify the Iowa DNR, Air Quality Bureau in writing.

(1) Hazardous Air Pollutant as defined by 112(b) of the Clean Air Act. For a list of HAPs, please refer to Table A that is attached to Form 112(g) which is part of the Air Construction Permit Application or contact the Iowa DNR - Air Quality Bureau.

Authority for Requirement: Iowa DNR Construction Permit 05-A-565-S2

### Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following

- A. The permittee shall maintain a current list of all resins, catalyst and other chemicals (e.g. Zip-Slip Release Agent) in use for this emissions unit. This list shall include: material safety data sheets (MSDS), manufacturer's product specifications, and material VOC content reports for each resin, catalyst, and release agent used, showing at least the product manufacturer, product name and code, and VOC and HAP content.
- B. The permittee shall maintain the following daily records on the Isocure coremaking machines:
  - i. The amount of sand used (pounds);
  - ii. The amount of resin and catalyst used (pounds). This shall be determined in the following way:
    - a. Pounds of Total Resin = (1.6 / 100) x Pounds of Sand Where, 1.6 is the maximum percentage of total Isocure resin in the mixed sand.
    - b. Pounds of Isocure Resin Part I = (55 / 100) x Pounds of Total Resin Where, 55 is the percent of Isocure Resin Part I in the total resin.
    - c. Pounds of Isocure Resin Part II = (45/100) x Pounds of Total Resin Where, 45 is the percent of Isocure Resin Part II in the total resin.
    - d. Pounds of catalyst = 1.5 x (pounds of sand/ 2000) Where, 1.5 is the amount of catalyst used in pounds per ton of sand.
  - iii. The emission rate of each individual HAP from the Isocure coremaking machines (pounds);
  - iv. The emission rate of total HAP from the Isocure coremaking machines (pounds).
- C. The permittee shall maintain daily records on the emissions of individual and total HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (pounds).
- D. The permittee shall maintain the following monthly records:
  - i The amount of Zip-Slip Release Agent used (pounds);

ii The rolling 12-month total of the Zip-Slip Release Agent used (pounds);

- The emission rate of each individual HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons);
- iv The rolling, 12-month total of the emission rate of each individual HAP from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons);
- v The emission rate of total HAPs from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons); and
- vi The rolling, 12-month total of the emission rate of total HAPs from the following group of emissions units: Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) (tons).
- E. The daily emissions of individual HAPs from the Isocure coremaking machines shall be calculated by using the following equations:

 $Eph = \sum_{i} \frac{2}{100} \times P_{i} / 100 \times R_{i}$ 

Efo =  $\sum_{i} \frac{2}{100} \times FO_{i}/100 \times R_{i}$ 

 $Ena = \sum_{i} 9/100 \text{ x NA}_{i}/100 \text{ x R}_{i}$ 

 $Ecu = \sum_{i} 9/100 \times CU_{i}/100 \times R_{i}$ 

 $Exy = \sum_{i} -9/100 \ x \ XY_i/100 \ x \ R_i$ 

Where,

Eph = pounds of phenol emitted, Efo = pounds of formaldehyde emitted, Ena = pounds of naphthalene emitted, Ecu = pounds of cumene emitted, Exy = pounds of xylene emitted

 $P_i$  = percent (%) of phenol in resin i,  $FO_i$  = percent (%) of formaldehyde in resin i,  $NA_i$  = percent (%) of naphthalene in resin i,  $CU_i$  = percent (%) of cumene in resin i,  $XY_i$  = percent (%) of xylene in resin i.

 $R_i$  = amount of resin type i used during the day (pounds)

2 = percent of phenol and formaldehyde emitted during coremaking, from U. S. EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries -Background Information for Proposed Standards (EPA 453/R-02-013), December 2002, Table B-5

- 9 = percent of naphthalene, cumene, and xylene emitted during coremaking, from U. S. EPA's <u>National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries -Background Information for Proposed Standards (EPA 453/R-02-013)</u>, December 2002, Table B-5
- F. The permittee shall submit reports that identify all exceedances of the rolling 12-month emissions limitations for HAPs from Emission Limits section above. The report shall be submitted no later than 30 days from the end of the month in which the exceedance occurred.
- G. If the rolling, 12-month total of any individual HAP emissions from Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) exceeds 7.0 tons per year, the permittee shall maintain the following daily records:
  - i The daily emission rate of individual HAP from the emissions units.
  - ii. Beginning with the first day after the emission rate of the individual HAP exceeds 7.0 tons per year, the rolling, 365-day total of the individual HAP emissions.

The permittee may return to the monthly recordkeeping required in Condition D above when the rolling 365-day total of individual HAP emissions is less than 7.0 tons. The monthly recordkeeping requirement will go back into effect beginning on the first day of the calendar month that follows the day on which individual HAP emissions are less than the 7.0 tpy threshold.

- H. If the rolling, 12-month total of total HAP emissions from Manual Pour and Cool Line (EU 104), Disa A & B Mold, Pour and Cool Line (EU 105), Disa C Mold, Pour and Cool Line (EU 106), Shell Coremaking (EU 124), Isocure Coremaking (EU 126), Shakeout (EU 107), 20 x 26 Shakeout (EU 108), Disa A & B Shakeout (EU 109), and Disa C Shakeout (EU 110) exceeds 17.0 tons per year, the permittee shall maintain the following daily records:
  - i. The daily emission rate of total HAPs from the emissions units.
  - ii. Beginning with the first day after the emission rate of the total HAPs exceeds 17.0 tons per year, the rolling, 365-day total of total HAP emissions.

The permittee may return to the monthly recordkeeping required in Condition D above when the rolling 365-day total of total HAP emissions is less than 17.0 tons. The monthly recordkeeping requirement will go back into effect beginning on the first day of the calendar month that follows the day on which total HAP emissions are less than the 17.0 tpy threshold.

Authority for Requirement: Iowa DNR Construction Permit 05-A-565-S2

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 26.83

Stack Opening, (inches, dia.): 26 Exhaust Flow Rate (scfm): 6,000 Exhaust Temperature (°F): Ambient

Discharge Style: Vertical Unobstructed Discharge

Authority for Requirement: Iowa DNR Construction Permit 05-A-565-S2

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

The following equipment vents through this emission point: Six coremaking machines, Gaylord SATB 15-5, Gaylord SATB 30-5, HS-22, HP-44, CB-22-SA and the Alpha Set.

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 24.108(3)

ZLP 96 99-TV-058R4,

## **Emission Point ID Number: EP 147F Fugitive Emissions (External)**

Associated Equipment	
Associated Emission Unit ID Numbers: EU 147	
Emission Unit vented through this Emission Point: EU 147	
Emission Unit Description: Haul Road	
Raw Material/Fuel: VMT	

## **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Fugitive Dust

Rated Capacity: 2.2 VMT/hr

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

Authority for Requirement: 567 IAC 24.108(3)

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

ZLP 97 99-TV-058R4,

## **Emission Point ID Number: EP 148F Fugitive Emissions (External)**

Associated Equipment
Associated Emission Unit ID Numbers: EU 148
Emission Unit vented through this Emission Point: EU 148 Emission Unit Description: Charging Chute
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Raw Material/Fuel: Scrap Iron Rated Capacity: 20 ton/hr

## **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Fugitive Dust

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

Authority for Requirement: 567 IAC 24.108(3)

### **Monitoring Requirements**

violitoring requirements	
The owner/operator of this equipment shall comply with the monitoring	requirements listea
below.	
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

ZLP 98 99-TV-058R4,

## **Emission Point ID Number: EP 149F Fugitive Emissions (External)**

Associated Equipment	
Associated Emission Unit ID Numbers: EU 149	
Emission Unit vented through this Emission Point: EU 149	_
Emission Unit Description: Coke Storage Pile	
Raw Material/Fuel: Coke	
Rated Capacity: 2.34 ton/hr	

## **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Fugitive Dust

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

### **Monitoring Requirements**

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The owner/operator of this equipment shall comply with the monitoring	g requirements listed
below.	
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🔀
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 24.108(3)	

ZLP 99 99-TV-058R4,

## **Emission Point ID Number: EP 150F Fugitive Emissions (External)**

Associated Equipment	
Associated Emission Unit ID Numbers: EU 150	
Emission Unit vented through this Emission Point: EU 150	
Emission Unit Description: Limestone Storage Pile	
Raw Material/Fuel: Limestone	

Raw Material/Fuel: Limestone Rated Capacity: 0.8 ton/hr

## **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Fugitive Dust

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

Authority for Requirement: 567 IAC 24.108(3)

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

ZLP 100 99-TV-058R4,

### **Emission Point ID Number: EP 230-Vent**

### Associated Equipment

Associated Emission Unit ID Numbers: EU 157-Vent 230

Emission Unit vented through this Emission Point: EU 157-Vent 230

Emission Unit Description: Metal Transfers

Raw Material/Fuel: Iron

Rated Capacity: 13.5 tons of Metal/hour

## **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limits: 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 04-A-386

(1) An exceedance of the indicator opacity of 10% will require the owner/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 DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM) Emission Limits: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2) "a"

Iowa DNR Construction Permit 04-A-386

Pollutant: PM-10

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Emission Limit(s): 0.05 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 04-A-386

#### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 29 Stack Diameter (inches, dia.): 55.5 Exhaust Flow Rate (scfm): 16,800 Exhaust Temperature (°F): Ambient Discharge Style: Vertical unobstructed

Authority for Requirement: Iowa DNR Construction Permit 04-A-386

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

### **Emission Point ID Number: EP 231-Vent**

### Associated Equipment

Associated Emission Unit ID Numbers: EU 157-Vent 231

Emission Unit vented through this Emission Point: EU 157-Vent 231

Emission Unit Description: Metal Transfers

Raw Material/Fuel: Iron

Rated Capacity: 13.5 tons of Metal/hour

## **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limits: 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 04-A-387

(1) An exceedance of the indicator opacity of 10% will require the owner/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 DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM) Emission Limits: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

Iowa DNR Construction Permit 04-A-387

Pollutant: PM-10

Emission Limit(s): 0.12 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 04-A-387

#### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 29 Stack Diameter (inches, dia.): 55.5 Exhaust Flow Rate (scfm): 40,320 Exhaust Temperature (°F): Ambient Discharge Style: Vertical unobstructed

Authority for Requirement: Iowa DNR Construction Permit 04-A-387

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

### **Emission Point ID Number: EP 232-Vent**

### Associated Equipment

Associated Emission Unit ID Numbers: EU 157-Vent 232

Emission Unit vented through this Emission Point: EU 157-Vent 232

Emission Unit Description: Metal Transfers

Raw Material/Fuel: Iron

Rated Capacity: 13.5 tons of Metal/hour

## **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limits: 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 04-A-388

(1) An exceedance of the indicator opacity of 10% will require the owner/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 DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM) Emission Limits: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

Iowa DNR Construction Permit 04-A-388

Pollutant: PM-10

Emission Limit(s): 0.053 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 04-A-388

#### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 29 Stack Diameter (inches, dia.): 38.5 Exhaust Flow Rate (scfm): 17,785 Exhaust Temperature (°F): Ambient Discharge Style: Vertical unobstructed

Authority for Requirement: Iowa DNR Construction Permit 04-A-388

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂
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### **Emission Point ID Number: EP 233-Vent**

### Associated Equipment

Associated Emission Unit ID Numbers: EU 157-Vent 233

Emission Unit vented through this Emission Point: EU 157-Vent 233

Emission Unit Description: Metal Transfers

Raw Material/Fuel: Iron

Rated Capacity: 13.5 tons of Metal/hour

## **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limits: 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 04-A-389

(1) An exceedance of the indicator opacity of 10% will require the owner/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 DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM) Emission Limits: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

Iowa DNR Construction Permit 04-A-389

Pollutant: PM-10

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Emission Limit(s): 0.050 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 04-A-389

#### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 29 Stack Diameter (inches, dia.): 38.5 Exhaust Flow Rate (scfm): 16,165 Exhaust Temperature (°F): Ambient Discharge Style: Vertical unobstructed

Authority for Requirement: Iowa DNR Construction Permit 04-A-389

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

#### **Emission Point ID Number: EP 234-Vent**

#### Associated Equipment

Associated Emission Unit ID Numbers: EU 157-Vent 234

Emission Unit vented through this Emission Point: EU 157-Vent 234

Emission Unit Description: Metal Transfers

Raw Material/Fuel: Iron

Rated Capacity: 13.5 tons of Metal/hour

# **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limits: 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 04-A-390

(1) An exceedance of the indicator opacity of 10% will require the owner/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 DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM) Emission Limits: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

Iowa DNR Construction Permit 04-A-390

Pollutant: PM-10

Emission Limit(s): 0.051 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 04-A-390

#### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 31 Stack Diameter (inches, dia.): 38.5 Exhaust Flow Rate (scfm): 17,000 Exhaust Temperature (°F): Ambient Discharge Style: Vertical unobstructed

Authority for Requirement: Iowa DNR Construction Permit 04-A-390

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🗵

Authority for Requirement: 567 IAC 24.108(3)

ZLP 110 99-TV-058R4,

# **Emission Point ID Number: EP 158F Fugitive Emissions (External)**

Associated Equipment
Associated Emission Unit ID Numbers: EU 158
Emission Unit vented through this Emission Point: EU 158 Emission Unit Description: Yard Traffic Raw Material/Fuel: VMT Rated Capacity: 1.1 VMT/hr
Applicable Requirements
Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)  The emissions from this emission point shall not exceed the levels specified below.
Pollutant: Fugitive Dust Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"
Monitoring Requirements  The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Yes 🗌 No 🔀 Agency Approved Operation & Maintenance Plan Required?

Yes 🗌 No 🖂 Facility Maintained Operation & Maintenance Plan Required?

Yes 🗌 No 🖂 **Compliance Assurance Monitoring (CAM) Plan Required?** 

Authority for Requirement: 567 IAC 24.108(3)

ZLP 111 99-TV-058R4,

# **Emission Point ID Number: EP 159F Fugitive Emissions (External)**

Associated Equipment
Associated Emission Unit ID Numbers: EU 159
Emission Unit vented through this Emission Point: EU 159 Emission Unit Description: Temporary Sand Storage Pile Raw Material/Fuel: Sand Rated Capacity: 5.66 tons/hr
Applicable Requirements
Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.) The emissions from this emission point shall not exceed the levels specified below.
Pollutant: Fugitive Dust Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.
Authority for Requirement: 567 IAC 23.3(2)"c"
Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 24.108(3)

ZLP 112 99-TV-058R4,

# **Emission Point ID Number: EP 160F Fugitive Emissions (External)**

Associated Equipment	
Associated Emission Unit ID Numbers: EU 160	
Emission Unit vented through this Emission Point: EU 160 Emission Unit Description: Permanent Sand Storage Pile	

Raw Material/Fuel: Sand Rated Capacity: 5.66 tons/hr

# **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Fugitive Dust

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

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Authority for Requirement: 567 IAC 24.108(3)

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#### **Emission Point ID Number: EP 161**

#### **Associated Equipment**

Associated Emission Unit ID Numbers: EU 146, EU 161A, EU 161B, EU 161C & EU 161D

Emissions Control Equipment ID Number: CE 310 Emissions Control Equipment Description: Baghouse

Emission Unit vented through this Emission Point: EU 146, EU 161A, EU 161B, EU 161C &

EU 161D

Emission Unit Description: Tumblers 5 & 6, Autoline Cooler, Disa B Cooler, Disa A Cooler &

Disa C Cooler

Raw Material/Fuel: Metal Rated Capacity: 18 tons/hr

# **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40 % (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 18-A-220

(1) An exceedance of the indicator opacity of "No Visible Emissions" 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 Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 0.28 lbs/hr

Authority for Requirement: Iowa DNR Construction Permit 18-A-220

Pollutant: Particulate Matter (PM) Emission Limits: 0.1 gr/dscf, 0.28 lbs/hr

Authority for Requirement: 567 IAC 23.3(2)"a"

Iowa DNR Construction Permit 18-A-220

ZLP 114 99-TV-058R4,

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Operating Requirements and Associated Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner.

- A. The permittee shall inspect and maintain the control equipment according to the facility's operation and maintenance plan or manufacturer's specifications with inspections occurring at a minimum of once per calendar year.
- B. The facility shall maintain a log of all maintenance and inspection activities performed on the control equipment, CE 310. This log shall include, but is not limited to:
  - i. The date and time any inspection and/or maintenance was performed on the emission unit and/or control equipment;
  - ii. Any issue(s) identified during the inspection and the date each issue(s) was resolved; and,
  - iii. Any issue(s) addressed during the maintenance activities and the date each issue(s) was resolved.

Authority for Requirement: Iowa DNR Construction Permit 18-A-220

#### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 90 Stack Diameter (inches, dia.): 48 Exhaust Flow Rate (scfm): 33,250 Exhaust Temperature (°F): 175 Discharge Style: Vertical Unobstructed

Authority for Requirement: Iowa DNR Construction Permit 18-A-220

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or

submit a permit application requesting to amend the permit.

ZLP 115 99-TV-058R4,

# Monitoring Requirements The owner/operator of this equipment shall comply with the monitoring requirements listed below. Stack Testing Pollutant - Particulate Matter (PM) Stack Test to be Completed by (date): TWO YEARS OF PERMIT ISSUANCE Test Method – 40 CFR Part 60 Appendix A, Method 5 Authority for Requirement - 567 IAC 24.108(3)

 Agency Approved Operation & Maintenance Plan Required?
 Yes □ No ⋈

 Facility Maintained Operation & Maintenance Plan Required?
 Yes □ No ⋈

 Compliance Assurance Monitoring (CAM) Plan Required?
 Yes ⋈ No ⋈

Authority for Requirement: 567 IAC 24.108(3)

# **CAM Plan for CE-310 Baghouse**

This emission point shall conform to the conditions listed below

#### **Dust collector Parameters**

• Associated Emission Units: EU 146 Tumblers 5& 6, EU 161A Autoline Cooler, EU 161B Disa B Cooler, EU 161C Disa A Cooler, EU 161D Disa C Cooler.

• Associated Emission Point: EP 161

• Pollutants Controlled: PM

#### **Applicable Requirements**

See Iowa DNR Construction Permit 18-A-220

# Monitoring Approach

#### **General Monitoring Guidelines**

- CAM involves the observation of control equipment compliance indicators, such as visible emissions and pressure drop. This plan defines acceptable ranges for these indicators. CAM also includes control equipment maintenance and inspections. Maintenance and inspections that will facilitate consistent control equipment operations are identified in this plan.
- Monitoring is not required during periods of time greater than one day in which the source does not operate.
- If weather prevents visible emissions monitoring, the observer will note the weather conditions on the form used to record monitoring. If an observation is necessary to meet the required weekly monitoring, at least three attempts will be made to retake the observation throughout the day. If unsuccessful that day due to weather, an observation will be made the next day the weather permits.

#### **Excursion from Compliance Indicators**

- An excursion occurs when an observed compliance indicator is outside of its defined acceptable indicator range. An excursion does not necessarily indicate a deviation or violation of applicable permit terms, conditions, and/or requirements.
- HyCast Foundry, LLC will take corrective action in accordance with the severity of the excursion. Corrective actions will begin as soon as possible, but no later than eight hours from the observation of the excursion. {Abnormal conditions discovered through equipment inspection and maintenance also require implementation of remediation within eight hours.)
- Corrective actions will result in one of the following:
  - If corrective actions return the process and control equipment operations to normal, the excursion does not result in a monitoring deviation.
  - If corrective actions do not correct the excursion or no corrective action is taken, then a monitoring deviation results.
    - For visible emissions, if corrective action does not return the observation to no visible emissions, a Method 9 observation is required to determine opacity.

- If a Method 9 observation is made that exceeds the indicator opacity, then an indicator opacity exceedance has occurred. The indicator opacity for this emission point is no visible emissions.
- In addition, if a Method 9 observation is made that exceeds the opacity permit limit, then a violation has also occurred.
- If corrective actions do not return the compliance indicator to its defined acceptable indicator range, HyCast Foundry, LLC will perform the following follow-up actions, *as applicable*:
  - ➤ Continue corrective actions.
  - ➤ Promptly orally report the excursion to the IDNR central office {whether or nexcursion from compliance indicator range is believed to have caused excess emissions).
  - ➤ Promptly orally report the indicator opacity exceedance to field office of IDNR; Withinseven days of the exceedance, file a written indicator opacity exceedance report with both field office and central office {Compliance Unit) of IDNR.
  - ➤ Promptly orally report excess emissions to field office of IDNR {if due to other than startup, shutdown, or cleaning); Within seven days of the excess emissions, file a written excess emissions report with both field office and central office {Compliance Unit) of IDNR.
  - ➤ Conduct source testing within 90 days of the excursion to demonstrate compliance.
    - If the test demonstrates compliance with emission limits, HyCast Foundry, LLC will determine new indicator ranges for monitoring.
    - If the test demonstrates noncompliance with emission limits, HyCast Foundry, LLC will, within 60 days, propose a schedule to implement corrective action to bring the source into compliance and conduct source testing to demonstrate compliance.
  - ➤ Report monitoring or other deviations {operating conditions, emission limits, orreporting requirements) in IDNR semi-annual monitoring and annual compliance certification reports.

#### **Compliance Indicator Ranges**

- Visible Emissions
  - > Observation of no visible emissions.
- Differential Pressure
  - ➤ Acceptable indicator range: 5" to 8" W.C.

# **Monitoring Methods**

- Daily
  - > Check for dust collector differential pressure.
- Weekly
  - > Observe for visible emissions during material handling of unit.
- Monthly
  - ➤ Inspect dust collector cleaning sequence.
  - > Check hopper function and performance.
- Quarterly

- ➤ Inspect bags for leaks and wear.
- Semi-Annually
  - Inspect all dust collector components that are not subject to wear or plugging, including structural components, housing, ducts, and hoods.

#### Performance Criteria

#### **Data Representativeness**

An observation of visible emissions could indicate a decrease in the performance of the dust collector and potentially an increase in particulate emissions. A differential pressure not within the acceptable indicator range could indicate reduced performance by the dust collector and potentially an increase in particulate emissions.

#### **Record Keeping and Reporting (Verification of Operational Status)**

- HyCast Foundry, LLC will maintain records of the following:
  - ➤ Daily logs of differential pressure readings.
  - ➤ Weekly logs of emissions observations and differential pressure.
  - All daily, monthly, quarterly, and semi-annually required inspections and maintenance. The date, time, and the location of the bag in relationship to the other bags must document bag replacement.
  - All corrective actions resulting from compliance indicators and inspections admaintenance.
  - Excursion, indicator opacity exceedance, and excess emissions reports.
- Records will be kept for at least five years and be available upon request.

#### **Quality Control**

- The dust collectors and their monitoring equipment will be operated and maintained according to manufacturer recommendations and/or as outlined in the above monitoring requirements.
- HyCast Foundry, LLC will maintain an adequate inventory of spare parts.

#### **Data Collection Procedures**

- Manual log entries are made based on gauge readings and the observation (or not) of visible emissions.
- Maintenance personnel record all maintenance/inspections performed on the dust collector and actions resulting from the inspections.

## Justification

#### **Selection of Compliance Indicators**

Visible emissions and differential pressure readings were selected as performance indicators because they demonstrate the dust collector's function of collecting particulate matter {effectiveness of cleaning cycle, loose or collapsed bags, etc.). How well the dust collector collects particulate matter will demonstrate the likelihood of compliance with applicable requirements.

# **Selection of Compliance Indicator Ranges**

The ranges selected are a reflection of both historical normal operation measurements for the indicators and manufacturer recommendations for the indicators.

# **Test Data**

Stack test for PM was completed in the spring of 2000. One-time test was required by IDNR Construction Permit 18-A-220.

Authority for Requirement: 567 IAC 24.108(3)

#### **Emission Point ID Number: EP 152**

#### Associated Equipment

Associated Emission Unit ID Numbers: EU 152

Emission Unit vented through this Emission Point: EU 152 Emission Unit Description: Emergency Generator (400 kW)

Raw Material/Fuel: Fuel Oil Rated Capacity: 28.6 gallons/hr

# **Applicable Requirements**

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

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 15-A-058

(1) An exceedance of the indicator opacity of 25% 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 Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM) Emission Limit(s): 2.48 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 15-A-058

Pollutant: PM-10

Emission Limit(s): 2.48 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 15-A-058

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 2.5 lb/MMBtu

Authority for Requirement: 567 IAC 23.3(3)"b"

Iowa DNR Construction Permit 15-A-058

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Operating Limits**

Operating limits for this emission unit shall be:

A. This engine is limited to burning diesel fuel oil that meets the requirements of condition D, shown below.

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- B. This engine is limited to operating a maximum of 500 hours in any rolling 12-month period.
- C. i. This engine is limited to operate as an emergency stationary internal combustion engine as defined in §63.6675 and in accordance with §63.6640(f). There is no time limit on the use of the engine in emergency situations provided that the operating hour limit established in Condition B is not exceeded. In accordance with §63.6640(f), the engine is limited to operate a maximum of 100 hours per year for maintenance checks and readiness testing.
  - ii. The engine is also allowed to operate up to 50 hours per year in non-emergency situations, but the 50 hours are counted toward the 100 hours provided for maintenance and testing. The 50 hours per year for non-emergency operation cannot be used to generate income for the facility to supply power to the electric grid or otherwise supply non-emergency power as part of a financial arrangement with another entity. This engine is not allowed to operate as a peak shaving unit.
  - iii. The 50 hours per year allowed for non-emergency situations may be used for local demand response, provided that the conditions in §63.6640(f) (4) (ii) (A) through (E) are all met.
- D. In accordance with §60.4207(b), the diesel fuel oil burned in this engine shall meet the following specifications from 40 CFR 80.510(b) for nonroad diesel fuel:
  - i. a maximum sulfur content of 15 ppm (0.0015%) by weight; and
  - ii. a minimum cetane index of 40 or a maximum aromatic content of 35 percent by volume.
- E. In accordance with §63.6625(f), the engine shall be equipped with a non-resettable hour meter.
- F. In accordance with §63.6603(a) and Table 2d of Subpart ZZZZ as promulgated on January 30, 2013, the owner or operator must comply with the following requirements for this engine:
  - i. Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the applicable non-startup emission limitations apply.
  - ii. Change the oil and filter annually (1);
  - iii. Inspect the air cleaner annually; and
  - iv. Inspect all hoses and belts annually and replace as necessary.

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<sup>(1)</sup> The facility has the option to utilize an oil analysis program as describer in 63.6625(i) in order to extend the specified oil change requirement in Table 2d of Subpart ZZZZ as promulgated on January 30, 2013. The oil analysis must be done on the same frequency as the specified oil change requirement.

#### **Operating Condition Monitoring and Recordkeeping**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- A. The owner or operator shall maintain the following monthly records:
  - i. the number of hours that the engine operated for maintenance checks and readiness testing;
  - ii. the number of hours that the engine operated for allowed non-emergency operations;
  - iii. the total number of hours that the engine operated; and
  - iv. the rolling 12-month total amount of the number of hours that the engine operated.
- B. The owner or operator shall maintain the following annual records:
  - i. the number of hours that the engine operated for maintenance checks and readiness testing; and
  - ii. the number of hours that the engine operated for allowed non-emergency operations.
- C. For the fuel burned in this emissions unit, the owner or operator shall perform an analysis and shall maintain records on the sulfur content of each shipment of oil received. Alternatively, the owner or operator shall have the oil supplier provide analyses on the sulfur content of the oil received. The analysis does not have to be for each shipment of oil received, but shall be documented by receipts from the fuel supplier, a statement from the fuel supplier on the specification of the sulfur content of the purchased oil, or other supporting documentation.

Authority for Requirement: Iowa DNR Construction Permit 15-A-058

#### **NESHAP:**

The emergency engine is subject to 40 CFR 63 Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). According to 40 CFR 63.6590(a)(1)(iii) this compression ignition emergency engine, located at an area source, is an existing stationary RICE as it was constructed prior to June 12, 2006.

Authority for Requirement: 40 CFR 63 Subpart ZZZZ 567 IAC 23.1(4)"cz"

#### **Emission Point Characteristics**

This emission point shall conform to the conditions listed below.

Stack Height (ft. from the ground): 13

Stack Diameter (inches, dia.): 8 Exhaust Flow Rate (scfm): 1152 Exhaust Temperature (°F): 1100

Discharge Style: Vertical unobstructed

Authority for Requirement: Iowa DNR Construction Permit 15-A-058

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 24.108(3)

# IV. General Conditions

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code (IAC). When 567 IAC as amended May 15, 2024, and cited in this permit becomes State Implementation Plan (SIP) approved, it will supersede 567 IAC as amended February 8, 2023. Prior to May 15, 2024, all Title V rule citations in this Title V permit were found and cited in 567 IAC Chapter 22. During the period from May 15, 2024, to the date that 567 IAC as amended May 15, 2024, is approved into the SIP, both 567 IAC as amended May 15, 2024, and 567 IAC as amended February 8, 2023 form the legal basis for the applicable requirements included in this permit. A crosswalk showing the citation changes is attached to this permit in Appendix B.

### G1. Duty to Comply

- 1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. 567 IAC 24.108(9)"a"
- 2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. 567 IAC 24.105(2)"h"(3)
- 3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. 567 IAC 24.108(1)"b"
- 4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. 567 IAC 24.108(14)
- 5. It shall not be a defense for a permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. 567 IAC 24.108(9)"b"
- 6. For applicable requirements with which the permittee is in compliance, the permittee shall continue to comply with such requirements. For applicable requirements that will become effective during the permit term, the permittee shall meet such requirements on a timely basis. 567 IAC 24.108(15)"c"

#### **G2.** Permit Expiration

- 1. Except as provided in rule 567—24.104(455B), permit expiration terminates a source's right to operate unless a timely and complete application for renewal has been submitted in accordance with rule 567—24.105(455B). 567 IAC 24.116(2)
- 2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall submit on forms or electronic format specified by the Department. Additional copies to local programs or EPA are not required for application materials submitted through the electronic format specified by the Department. The application must include all emission points, emission units, air pollution control equipment, and monitoring devices at the facility. All emissions generating activities, including fugitive emissions, must be included. The definition of a complete application is as indicated in 567 IAC 24.105(2). 567 IAC 24.105

#### G3. Certification Requirement for Title V Related Documents

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable

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inquiry, the statements and information in the document are true, accurate, and complete. 567 IAC 24.107(4)

#### **G4.** Annual Compliance Certification

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. 567 IAC 24.108(15)"e"

#### **G5. Semi-Annual Monitoring Report**

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 24.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. 567 IAC 24.108 (5)

#### **G6.** Annual Fee

- 1. The permittee is required under subrule 567 IAC 24.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
- 2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
- 3. The emissions inventory shall be submitted annually by March 31 with forms specified by the department documenting actual emissions for the previous calendar year.
- 4. The fee shall be submitted annually by July 1 with forms specified by the department.
- 5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
- 6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.
- 7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.
- 8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 24.115(1)"d".

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#### G7. Inspection of Premises, Records, Equipment, Methods and Discharges

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

- 1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- 2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- 3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- 4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. 567 IAC 24.108 (15)"b"

#### **G8.** Duty to Provide Information

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. 567 IAC 24.108 (9)"e"

# **G9.** General Maintenance and Repair Duties

The owner or operator of any air emission source or control equipment shall:

- 1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
- 2. Remedy any cause of excess emissions in an expeditious manner.
- 3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
- 4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. 567 IAC 21.8(1)

# G10. Recordkeeping Requirements for Compliance Monitoring

- 1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:
  - a. The date, place and time of sampling or measurements
  - b. The date the analyses were performed.
  - c. The company or entity that performed the analyses.
  - d. The analytical techniques or methods used.
  - e. The results of such analyses; and
  - f. The operating conditions as existing at the time of sampling or measurement.
  - g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)
- 2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance

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records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.

- 3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:
  - a. Comply with all terms and conditions of this permit specific to each alternative scenario.
  - b. Maintain a log at the permitted facility of the scenario under which it is operating.
  - c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. 567 IAC 24.108(4), 567 IAC 24.108(12)

#### G11. Evidence used in establishing that a violation has or is occurring.

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein. 1. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:

- a. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 24;
- b. Compliance test methods specified in 567 Chapter 21; or
- c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.
- 2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
  - a. Any monitoring or testing methods provided in these rules; or
  - b. Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule. 567 IAC 21.5(1)-567 IAC 21.5(2)

# G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. 567 IAC 24.108(6)

#### G13. Hazardous Release

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 725-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in 567 IAC 131.2(2). 567 IAC Chapter 131-State Only

#### G14. Excess Emissions and Excess Emissions Reporting Requirements

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process

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equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control measures. Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. A variance from this subrule may be available as provided for in Iowa Code section 455B.143. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

### 2. Excess Emissions Reporting

- a. Initial Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 21.10(6). An initial report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 21.10(1)) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable emission standard by more than 10 percent or the applicable visible emission standard by more than 10 percent opacity. The initial report may be made by electronic mail (E-mail), in person, or by telephone and shall include as a minimum the following:
  - i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
  - ii. The estimated quantity of the excess emission.
  - iii. The time and expected duration of the excess emission.
  - iv. The cause of the excess emission.
  - v. The steps being taken to remedy the excess emission.
  - vi. The steps being taken to limit the excess emission in the interim period.
- b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required initial reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:
  - i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
  - ii. The estimated quantity of the excess emission.

- iii. The time and duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.
- vi. The steps that were taken to limit the excess emission.
- vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. 567 IAC 21.7(1)-567 IAC 21.7(4)

### **G15. Permit Deviation Reporting Requirements**

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). 567 IAC 24.108(5)"b"

# **G16.** Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. 567 IAC 23.1(2), 567 IAC 23.1(4)

# G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification

- 1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:
  - a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 24.
  - b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);
  - c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
  - d. The changes are not subject to any requirement under Title IV of the Act (revisions affecting Title IV permitting are addressed in rules 567—24.140(455B) through 567 24.144(455B));
  - e. The changes comply with all applicable requirements.
  - f. For each such change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:
    - i. A brief description of the change within the permitted facility,
    - ii. The date on which the change will occur,
    - iii. Any change in emission as a result of that change,

- iv. The pollutants emitted subject to the emissions trade
- v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.
- vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
- vii. Any permit term or condition no longer applicable as a result of the change. 567 IAC 24.110(1)
- 2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. 567 IAC 24.110(2)
- 3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 24.110(1). 567 IAC 24.110(3)
- 4. The permit shield provided in subrule 24.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. 567 IAC 24.110(4)
- 5. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. 567 IAC 24.108(11)

### G18. Duty to Modify a Title V Permit

- 1. Administrative Amendment.
  - a. An administrative permit amendment is a permit revision that does any of the following:
    - i. Correct typographical errors
    - ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source;
    - iii. Require more frequent monitoring or reporting by the permittee; or
    - iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.
  - b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.
  - c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.
- 2. Minor Title V Permit Modification.

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- a. Minor Title V permit modification procedures may be used only for those permit modifications that satisfy all of the following:
  - i. Do not violate any applicable requirement;
  - ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit;
  - iii. Do not require or change a case by case determination of an emission limitation or other standard, or an increment analysis;
  - iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act;
  - v. Are not modifications under any provision of Title I of the Act; and vi. Are not required to be processed as significant modification under rule 567 24.113(455B).
- b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:
  - i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
  - ii. The permittee's suggested draft permit;
  - iii. Certification by a responsible official, pursuant to 567 IAC 24.107(4), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
  - iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 24.107(7).
- c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 24.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against the facility.
- 3. Significant Title V Permit Modification.

Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 24, including those for applications, public participation, review by affected states, and review by the administrator, as those requirements that apply to Title V issuance and renewal.

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The permittee shall submit an application for a significant permit modification not later than three months after commencing operation of the changed source unless the existing Title V permit would prohibit such construction or change in operation, in which event the operation of the changed source may not commence until the department revises the permit. 567 IAC 24.111-567 IAC 24.113

#### G19. Duty to Obtain Construction Permits

Unless exempted in 567 IAC 22.1(2) or to meet the parameters established in 567 IAC 22.1(1)"c", the permittee shall not construct, install, reconstruct or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, or conditional permit, or permit pursuant to rule 567 IAC 22.8, or permits required pursuant to rules 567 IAC 22.4, 567 IAC 22.5, 567 IAC 31.3, and 567 IAC 33.3 as required in 567 IAC 22.1(1). A permit shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source or anaerobic lagoon. 567 IAC 22.1(1)

#### G20. Asbestos

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when activities involve asbestos mills, surfacing of roadways, manufacturing operations, fabricating, insulating, waste disposal, spraying applications, demolition and renovation operations (567 IAC 23.1(3)"a"); training fires and controlled burning of a demolished building (567 IAC 23.2).

# **G21. Open Burning**

The permittee is prohibited from conducting open burning, except as provided in 567 IAC 23.2. 567 IAC 23.2 except 23.2(3)"j"; 567 IAC 23.2(3)"j" - State Only

## G22. Acid Rain (Title IV) Emissions Allowances

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. 567 IAC 24.108(7)

#### G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements

- 1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.
  - b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
  - c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
  - d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.
- 2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:

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- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
- d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)
- e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
- f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.
- 3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,
- 5. The permittee shall be allowed to switch from any ozone-depleting or greenhouse gas generating substances to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. 40 CFR part 82

#### **G24.** Permit Reopenings

- 1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. 567 IAC 24.108(9)"c"
- 2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as practicable, but not later than 18 months after the promulgation of such standards and regulations.
  - a. Reopening and revision on this ground is <u>not</u> required if the permit has a remaining term of less than three years;
  - b. Reopening and revision on this ground is <u>not</u> required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to May 15, 2001.
  - c. Reopening and revision on this ground is <u>not</u> required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the

source receives approval for coverage under that general permit. 567 IAC 24.108(17)"a", 567 IAC 24.108(17)"b"

- 3. A permit shall be reopened and revised under any of the following circumstances:
  - a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to July 21, 1992, provided that the reopening may be stayed pending judicial review of that determination; b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Title V permit;
  - c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.
  - d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
  - e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements. 567 IAC 24.114
- 4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. 567 IAC 24.114
- 5. A notice of intent shall be provided to the Title V source at least 30 days in advance of the date the permit is to be reopened, except that the director may provide a shorter time period in the case of an emergency. 567 IAC 24.114

# G25. Permit Shield

- 1. The director may expressly include in a Title V permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
  - a. Such applicable requirements are included and are specifically identified in the permit; or
  - b. The director, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- 2. A Title V permit that does not expressly state that a permit shield exists shall be presumed not to provide such a shield.
- 3. A permit shield shall not alter or affect the following:
  - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the administrator under that section;
  - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

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- c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act;
- d. The ability of the department or the administrator to obtain information from the facility pursuant to Section 114 of the Act. 567 IAC 24.108 (18)

## **G26.** Severability

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. 567 IAC 24.108 (8)

#### **G27. Property Rights**

The permit does not convey any property rights of any sort, or any exclusive privilege. 567 IAC 24.108 (9)"d"

#### G28. Transferability

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought consistent with the requirements of 567 IAC 24.111(1). 567 IAC 24.111 (1)"d"

#### G29. Disclaimer

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. 567 IAC 22.3(3)"c"

G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with applicable requirements of 567 – Chapter 23 or a permit condition. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. If the owner or operator does not provide timely notice to the department, the department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with applicable rules or permit conditions. Upon written request, the department may allow a notification period of less than 30 days. At the department's request, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. A testing protocol shall be submitted to the department no later than 15 days before the owner or operator conducts the compliance demonstration. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks (42 days) of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator Iowa DNR, Air Quality Bureau 6200 Park Ave Suite 200 Des Moines, IA 50321 (515) 343-6589

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program. 567 IAC 21.10(7)"a", 567 IAC 21.10(9)

# G31. Prevention of Air Pollution Emergency Episodes

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons. 567 IAC 26.1(1)

#### **G32.** Contacts List

The current address and phone number for reports and notifications to the EPA administrator is:

Iowa Compliance Officer

Air Branch

Enforcement and Compliance Assurance Division

U.S. EPA Region 7

11201 Renner Blvd.

Lenexa, KS 66219

(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau

Iowa Department of Natural Resources

6200 Park Ave

Suite 200

Des Moines, IA 50321

(515) 313-8325

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

#### Field Office 1

1101 Commercial Court, Suite 10 Manchester, IA 52057 (563) 927-2640

#### Field Office 3

1900 N. Grand Ave. Spencer, IA 51301 (712) 262-4177

#### Field Office 5

6200 Park Ave Suite 200 Des Moines, IA 50321 (515) 725-0268

#### **Polk County Public Works Dept.**

Air Quality Division 5885 NE 14th St. Des Moines, IA 50313 (515) 286-3351

#### Field Office 2

2300-15th St., SW Mason City, IA 50401 (641) 424-4073

#### Field Office 4

1401 Sunnyside Lane Atlantic, IA 50022 (712) 243-1934

#### Field Office 6

1023 West Madison Street Washington, IA 52353-1623 (319) 653-2135

#### **Linn County Public Health**

Air Quality Branch 1020 6<sup>th</sup> Street SE Cedar Rapids, IA 52401 (319) 892-6000

# V. Appendix A: NSPS/NESHAP

- Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines <a href="https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-ZZZZ">https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-ZZZZ</a>
- Subpart ZZZZZ—National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries Area Sources <a href="https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-ZZZZZ">https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-ZZZZZ</a>

# VI. Appendix B: Executive Order 10 (EO10) Rules Crosswalk

<b>Previous Chapter</b>	Current	Previous Title and	Current Title and	Actions Taken
Number (Prior to	Chapter	Description (Prior to 5/15/2024)	Description	
5/15/2024)	Number	, , , , , , , , , , , , , , , , , , , ,		
20	20 (Reserved)	Scope of Title - Definitions	N/A	Definitions moved to Ch. 21, 22 and 23.
				Rescinded Ch. 20. (Reserved)
21	21	Compliance	Compliance, Excess Emissions, and	<b>Kept and combined</b> with rules from Chapters 24, 25, 26, and 29.
			Measurement of Emissions	
22	22	Controlling Pollution-Permits	Controlling Air Pollution - Construction	Kept construction permit rules and combined with Ch. 20 (definitions) and Ch. 28 (NAAQS).
			Permitting	
				Moved operating permit rules to Chapter 24.
22.100 - 22.300(12)	(New) 24	N/A	Operating Permits	Moved operating permit rules from Ch. 22 to Ch. 24.
23	23	Emission Standards	Air Emission Standards	Kept
24	(New) 21	Excess Emissions	Compliance, Excess Emissions, and	Moved rules and combined with Ch. 21.
			Measurement of Emissions	
				Moved TV rules here (to Ch. 24).
25	(New) 21	Emissions Measurement	Compliance, Excess Emissions, and	Moved rules and combined with Ch. 21.
			Measurement of Emissions	
				Rescinded Ch. 25. (Reserved)
26	(New) 21	Emergency Air Pollution Episodes	Compliance, Excess Emissions, and	Moved rules and combined with Ch. 21.
			Measurement of Emissions	
				Rescinded Ch. 26. (Reserved)
27	27	Local Program Acceptance	Local Program Acceptance	Kept
28	22	NAAQS	N/A	Moved rules and combined with Ch. 22.
				Rescinded Ch. 28. (Reserved)
29	(New) 21	Opacity Qualifications	Compliance, Excess Emissions, and	Moved rules and combined with Ch. 21.
			Measurement of Emissions	
				Rescinded Ch. 29. (Reserved)
30	30	Fees	Fee	Kept
31	31	Nonattainment Areas	Nonattainment New Source Review	Kept
32	N/A	AFO Field Study	N/A	Rescinded Ch. 32. (Reserved)
33	33	Special regulations and construction permit		Kept
		requirements for major stationary	stationary sources—Prevention of significant	
		sources—Prevention of significant	deterioration (PSD)	
		deterioration (PSD) of air quality		
34	N/A	Emissions Trading-CAIR-CAMR	N/A	Rescinded Ch. 34. (Reserved)
35	N/A	Grant Assistance Programs	N/A	Rescinded Ch. 35. (Reserved)

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<b>Previous Chapter</b>	Current	Previous Title and	Current Title and	Actions Taken
Number (Prior to	Chapter	Description (Prior to 5/15/2024)	Description	
5/15/2024)	Number			
20	20 (Reserved)	Scope of Title - Definitions	N/A	Definitions moved to Ch. 21, 22 and 23.
				Rescinded Ch. 20. (Reserved)
20.1	N/A	Scope of title	N/A	
20.2	Ch. 21, 22, 23	Definitions	Definitions	See beginning of Ch. 21, 22, and 23
20.3	N/A	Air quality forms generally	N/A	

21	21	Compliance	Compliance, Excess Emissions, and	Kept and combined with rules from Chapters 24, 25, 26, and 29.
			Measurement of Emissions	
21.1	21.1	Compliance Schedule	Definitions and compliance requirements	Added definitions from Ch. 21, some language updated
21.2	21.2	Variances	Variances	Some language updated
21.3	21.3	Emission reduction program	Reserved	Reserved
21.4	21.4	Circumvention of rules	Circumvention of rules	Minor language updated
21.5	21.5	Evidence used in establishing that a violation has	Evidence used in establishing that a violation has	21.5(2) Reserved, some language updated
		or is occurring	occurred or is occurring	
21.6	21.6	Temporary electricity generation for disaster	Temporary electricity generation for disaster	Minor language updated
		situations	situations	
24.1	21.7	Excess emission reporting	Excess emission reporting	Moved from Ch. 24, some language updated
24.2	21.8	Maintenance and repair requirements	Maintenance and repair requirements	Moved from Ch. 24, some language updated
N/A	21.9	N/A	Compliance with other requirements	New language
25.1	21.10	Testing and sampling of new and existing	Testing and sampling of new and existing	Moved from Ch. 25, some language updated
		equipment	equipment	
25.2	21.11	Continuous emission monitoring under the acid	Continuous emission monitoring under the acid	Moved from Ch. 25, some language updated
		rain program	rain program	
25.3	N/A	Mercury emissions testing and monitoring	N/A	Rescinded. Except 25.3(5)
25.3(5)	21.12	Affected sources subject to Section 112(g)	Affected sources subject to Section 112(g)	Moved from Ch. 25, some language updated
29.1	21.13	Methodology and qualified observer	Methodology and qualified observer	Moved from Ch. 29, some language updated
26.1	21.14	Prevention of air pollution emergency episodes -	Prevention of air pollution emergency episodes	Moved from Ch. 26, some language updated
		General		
26.2	21.15	Episode criteria	Episode criteria	Moved from Ch. 26, some language updated
26.3	21.16	Preplanned abatement strategies	Preplanned abatement strategies	Moved from Ch. 26, some language updated
26.4	21.17	Actions taken during episodes	Actions taken during episodes	Moved from Ch. 26, some language updated
Ch 26 Table III	Table I	Abatement strategies emission reduction actions	Abatement strategies emission reduction actions	Moved from Ch. 26, reference federal appendix table
		alert level	alert level	
Ch 26 Table IV	Table II	Abatement strategies emission reduction actions	Abatement strategies emission reduction actions	Moved from Ch. 26, reference federal appendix table
		warning level	warning level	
Ch 26 Table V	Table III	Abatement strategies emission reduction actions	Abatement strategies emission reduction actions	Moved from Ch. 26, reference federal appendix table
		emergency level	emergency level	

22	22	Controlling Pollution-Permits	Controlling Air Pollution - Construction	<b>Kept construction permit rules and combined</b> with Ch. 20 (definitions) and Ch. 28 (NAAQS).
			Permitting	
				Moved operating permit rules to Chapter 24.
22.1	22.1	Permits required for new or existing stationary	Definitions and permit requirements for new or	Added definitions from Ch. 20, some language updated
		sources	existing stationary sources	
22.2	22.2	Processing permit applications	Processing permit applications	
22.3	22.3	Issuing permits	Issuing permits	
22.4	22.4	Special requirements for major stationary	Major stationary sources located in areas	
		sources located in areas designated attainment	designated attainment or unclassified (PSD)	
		or unclassified (PSD)		
22.5	22.5	Special requirements for nonattainment areas	Major stationary sources located in areas	
			designated Nonattainment	
22.6	22.6	Nonattainment area designations	Reserved	

Number (Prior to	Current Chapter Number	Previous Title and Description (Prior to 5/15/2024)	Current Title and Description	Actions Taken
22.7	22.7	Alternative emission control program	Alternative emission control program	
22.8	22.8	Permit by rule	Permit by rule	
22.9	22.9	Special requirements for visibility protection	Special requirements for visibility protection	A lot of language updated or removed
22.10	22.10	elevators, country grain terminal elevators, grain	Permitting requirements for country grain elevators, country grain terminal elevators, grain terminal elevators and feed mill equipment	
28.1	22.11	Ambient air quality standards - Statewide standards	Ambient air quality standards	Moved from Ch. 28, minor language updated
22.12 to 22.99	N/A	Reserved	N/A	Removed

22.100 - 22.300(12)	(New) 24	N/A	Operating Permits	Moved operating permit rules from Ch. 22 to Ch. 24.
22.100	24.100	Definitions for Title V operating permits	Definitions for Title V operating permits	Moved from Ch. 22, some language updated, many 40 CFR 70 definitions adopted by reference
22.101	24.101	Applicability of Title V operating permit	Applicability of Title V operating permit	Moved from Ch. 22, some language updated to correct punctuation and remove old dates
		requirements	requirements	
22.102	24.102	Source category exemptions	Source category exemptions	Moved from Ch. 22, some language updated to correct punctuation
22.103	24.103	Insignificant activities	Insignificant activities	Moved from Ch. 22, some language updated to correct typos and remove old dates
22.104	24.104	Requirement to have a Title V permit	Requirement to have a Title V permit	Moved from Ch. 22, some language updated no changes to rule text
22.105	24.105	Title V permit applications	Title V permit applications	Moved from Ch. 22, updated language to address electronic submissions and remove past application due dates
22.106	24.106	Annual Title V emissions inventory	Annual Title V emissions inventory	Moved from Ch. 22, no changes to rule text
22.107	24.107	Title V permit processing procedures	Title V permit processing procedures	Moved from Ch. 22, some language updated to update locations of public records and remove old CFR amendment dates
22.108	24.108	Permit content	Permit content	Moved from Ch. 22, some language updated to correct punctuation, remove old dates, and adopt 40 CFR 70 rules by reference
22.109	24.109	General permits	General permits	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.110	24.110	Changes allowed without a Title V permit revision (off-permit revisions)	Changes allowed without a Title V permit revision (off-permit revisions)	Moved from Ch. 22, some language updated to remove redundant language
22.111	24.111	,	Administrative amendments to Title V permits	Moved from Ch. 22, no changes to rule text
22.112	24.112	Minor Title V permit modifications	Minor Title V permit modifications	Moved from Ch. 22, no changes to rule text
22.113	24.113	Significant Title V permit modifications	Significant Title V permit modifications	Moved from Ch. 22, no changes to rule text
22.114	24.114	Title V permit reopenings	Title V permit re-openings	Moved from Ch. 22 to Ch. 24, some language updated to adopt 40 CFR 70 rules by reference
22.115	24.115	Suspension, termination, and revocation of Title V permits	Suspension, termination, and revocation of Title V permits	Moved from Ch. 22, no changes to rule text
22.116	24.116	Title V permit renewals	Title V permit renewals	Moved from Ch. 22, no changes to rule text
22.117-22.119	24.117-24.119	Reserved	Reserved	Moved from Ch. 22, no changes to rule text
22.120	24.120	Acid rain program—definitions	Acid rain program—definitions	Moved from Ch. 22, some language updated to remove old CFR amendment dates and address electronic submissions
22.121	24.121	Measurements, abbreviations, and acronyms	Reserved	Moved from Ch. 22, no changes to rule text
22.122	24.122	Applicability	Applicability	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.123	24.123	Acid rain exemptions	Acid rain exemptions	Moved from Ch. 22, some language updated to correct punctuation
22.124	24.124	Retired units exemption	Reserved	Moved from Ch. 22, no changes to rule text
22.125	24.125	Standard requirements	Standard requirements	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.126	24.126	Designated representative—submissions	Designated representative—submissions	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.127	24.127	Designated representative—objections	Designated representative—objections	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.128	24.128	Acid rain applications—requirement to apply	Acid rain applications—requirement to apply	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference

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22.129	24.129	Information requirements for acid rain permit	Information requirements for acid rain permit	Moved from Ch. 22, no changes to rule text
		applications	applications	
Previous Chapter	Current	Previous Title and	Current Title and	Actions Taken
Number (Prior to	Chapter	Description (Prior to 5/15/2024)	Description	
•		Description (1 1101 to 5) 15/2024)	Description	
5/15/2024)	Number			
22.130	24.130	Acid rain permit application shield and binding	Acid rain permit application shield and binding	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
		effect of permit application	effect of permit application	
22.131	24.131	Acid rain compliance plan and compliance	Acid rain compliance plan and compliance	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
		options—general	options—general	
22.132	24.132	Repowering extensions	Reserved	Moved from Ch. 22, no changes to rule text
22.133	24.133	Acid rain permit contents—general	Acid rain permit contents—general	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.134	24.134	Acid rain permit shield	Acid rain permit shield	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.135	24.135	Acid rain permit issuance procedures—general	Acid rain permit issuance procedures—general	Moved from Ch. 22, no changes to rule text
22.136	24.136	Acid rain permit issuance	Acid rain permit issuance	Moved from Ch. 22, no changes to rule text
22.427	24.427	procedures—completeness	procedures—completeness	March Con Ch. 22 and a control of the L
22.137	24.137	Acid rain permit issuance procedures—statement	Acid rain permit issuance procedures—statement	INIOVED From Cn. 22, no changes to rule text
22.422	24.422	of basis	of basis	
22.138	24.138	Issuance of acid rain permits	Issuance of acid rain permits	Moved from Ch. 22, some language updated to remove old dates and deadlines
22.139	24.139	Acid rain permit appeal procedures	Acid rain permit appeal procedures	Moved from Ch. 22, no changes to rule text
22.140	24.140	Permit revisions—general	Permit revisions—general	Moved from Ch. 22, some language updated to remove old dates
22.141	24.141	Permit modifications	Permit modifications	Moved from Ch. 22, no changes to rule text
22.142	24.142	Fast-track modifications	Fast-track modifications	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.143	24.143	Administrative permit amendment	Administrative permit amendment	Moved from Ch. 22, some language updated to remove fax option
22.144	24.144	Automatic permit amendment	Automatic permit amendment	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.145	24.145	Permit reopenings	Permit re-openings	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.146	24.146	Compliance certification—annual report	Compliance certification—annual report	Moved from Ch. 22, no changes to rule text
22.147	24.147	Compliance certification—units with repowering extension plans	Reserved	Moved from Ch. 22, no changes to rule text
22.148	24.148	Sulfur dioxide opt-ins	Sulfur dioxide opt-ins	Moved from Ch. 22, some language updated to update the 40 CFR Part 74 amendment date
22.149 - 22.199	24.149 - 24.299	Reserved	Reserved	Moved from Ch. 22, no changes to rule text
22.200	24.200 - 24.299	Definitions for voluntary operating permits	Reserved	Moved from Ch. 22, no changes to rule text
22.201	24.200 - 24.299	Eligibility for voluntary operating permits	Reserved	Moved from Ch. 22, no changes to rule text
22.203	24.200 - 24.299	Voluntary operating permit applications	Reserved	Moved from Ch. 22, no changes to rule text
22.204	24.200 - 24.299	Voluntary operating permit fees	Reserved	Moved from Ch. 22, no changes to rule text
22.205	24.200 - 24.299	Voluntary operating permit processing procedures	Reserved	Moved from Ch. 22, no changes to rule text
22.206	24.200 - 24.299	Permit content	Reserved	Moved from Ch. 22, no changes to rule text
22.207	24.200 - 24.299	Relation to construction permits	Reserved	Moved from Ch. 22, no changes to rule text
22.208	24.200 - 24.299	Suspension, termination, and revocation of	Reserved	Moved from Ch. 22, no changes to rule text
		voluntary operating permits		
22.209	24.200 - 24.299	Change of ownership for facilities with voluntary	Reserved	Moved from Ch. 22, no changes to rule text
		operating permits		
22.210 - 22.299	24.200 - 24.299	Reserved	Reserved	Moved from Ch. 22, no changes to rule text
22.300	24.300	Operating permit by rule for small sources	Operating permit by rule for small sources	Moved from Ch. 22, no changes to rule text
		Ended to Considerate	All Factories Considerate	W. A

23	23	Emission Standards	Air Emission Standards	Kept
23.1	23.1	Emission standards	Emission standards	Kept, language updated, tables used
23.2	23.2	Open burning	Open burning	Kept, some language updated
23.3	23.3	Specific contaminants	Specific contaminants	Kept, some language updated
23.4	23.4	Specific processes	Specific processes	Kept, some language updated
23.5	23.5	Anaerobic lagoons	Anaerobic lagoons	Kept, some language updated
23.6	23.6	Alternative emission limits (the "bubble	Reserved	Removed
		concept")		

AQB Rule Tracking Crossv	vaik			
Previous Chapter Number (Prior to 5/15/2024)	Current Chapter Number	Previous Title and Description (Prior to 5/15/2024)	Current Title and Description	Actions Taken
24	(New) 21	Excess Emissions	Compliance, Excess Emissions, and Measurement of Emissions	Moved rules and combined with Ch. 21.
				Moved operating permit rules here (to Ch. 24).
24.1	21.7	Excess emission reporting	Excess emission reporting	Moved from Ch. 24, some language updated
24.2	21.8	Maintenance and repair requirements	Maintenance and repair requirements	Moved from Ch. 24, some language updated
25	(New) 21	Emissions Measurement	Compliance, Excess Emissions, and Measurement of Emissions	Moved rules and combined with Ch. 21.
25.1	21.10	Testing and sampling of new and existing equipment	Testing and sampling of new and existing equipment	Rescinded Ch. 25. (Reserved)  Moved from Ch. 25, some language updated
25.2	21.11	Continuous emission monitoring under the acid rain program	Continuous emission monitoring under the acid rain program	Moved from Ch. 25, some language updated
25.3		Mercury emissions testing and monitoring	N/A	Rescinded. Except 25.3(5)
25.3(5)	21.12	Affected sources subject to Section 112(g)	Affected sources subject to Section 112(g)	Moved from Ch. 25, some language updated
26	(New) 21	Emergency Air Pollution Episodes	Compliance, Excess Emissions, and Measurement of Emissions	Moved rules and combined with Ch. 21.  Rescinded Ch. 26. (Reserved)
26.1	21.14	Prevention of air pollution emergency episodes - General	Prevention of air pollution emergency episodes	Moved from Ch. 26, some language updated
26.2	21.15	Episode criteria	Episode criteria	Moved from Ch. 26, some language updated
26.3	21.16	Preplanned abatement strategies	Preplanned abatement strategies	Moved from Ch. 26, some language updated
26.4	21.17	Actions taken during episodes	Actions taken during episodes	Moved from Ch. 26, some language updated
Ch 26 Table III	Table I	Abatement strategies emission reduction actions alert level	Abatement strategies emission reduction actions alert level	Moved from Ch. 26, reference federal appendix table
Ch 26 Table IV	Table II	Abatement strategies emission reduction actions warning level	Abatement strategies emission reduction actions warning level	Moved from Ch. 26, reference federal appendix table
Ch 26Table V	Table III	Abatement strategies emission reduction actions emergency level	Abatement strategies emission reduction actions emergency level	Moved from Ch. 26, reference federal appendix table
27	27	Local Program Acceptance	Local Program Acceptance	Kept
27.1	27.1	General	General	Kept, some language updated
27.2	27.2	Certificate of acceptance	Certificate of acceptance	Kept, some language updated
27.3	27.3	Ordinance or regulations	Ordinance or regulations	Kept, some language updated
27.4	27.4	Administrative organization	Administrative organization	Kept, some language updated
27.5	27.5	Program activities	Program activities	Kept, some language updated
28	22	NAAQS	N/A	Moved rules and combined with Ch. 22.
				Rescinded Ch. 28. (Reserved)
28.1	22.11	Ambient air quality standards - Statewide standards	Ambient air quality standards	Moved from Ch. 28, minor language updated  Rescinded Ch. 28. (Reserved)
		•	1	
29	(New) 21	Opacity Qualifications	Compliance, Excess Emissions, and Measurement of Emissions	Moved rules and combined with Ch. 21.
	1			Rescinded Ch. 29. (Reserved)
29.1	21.13	Methodology and qualified observer	Methodology and qualified observer	Moved from Ch. 29, some language updated

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Previous Chapter	Current	Previous Title and	Current Title and	Actions Taken
				ACTIONS Taken
Number (Prior to	Chapter	Description (Prior to 5/15/2024)	Description	
5/15/2024)	Number			
30	30	Fees	Fee	Kept
30.1	30.1	Purpose	Purpose	Kept, language updated
30.2	30.2	Fees associated with new source review	Fees associated with new source review	Kept, some language updated
30.2	30.2	applications	applications	Rept, some language updated
30.3	30.3	Fees associated with asbestos demolition or	Fees associated with asbestos demolition or	Kept, some language updated
50.5	30.3	renovation notification	renovation notification	The property some tanguage aparted
30.4	30.4	Fees associated with Title V operating permits	Fees associated with Title V operating permits	Kept, some language updated
		,		
30.5	30.5	Fee advisory groups	Fee advisory groups	Kept, language updated
30.6	30.6	Process to establish or adjust fees and	Process to establish or adjust fees and	Kept, some language updated
		notification of fee rates	notification of fee rates	
30.7	30.7	Fee revenue	Reserved	Language removed
31	31	Nonattainment Areas	Nonattainment New Source Review	Kept
31.1	31.1	Permit requirements relating to nonattainment	Permit requirements relating to nonattainment	Kept, some language updated
		areas	areas	
31.2	31.2	Conformity of general federal actions to the Iowa	Reserved	Language removed
		state implementation plan or federal		
		implementation plan - Rescinded		
31.3	31.3	Nonattainment new source review requirements	Nonattainment new source review (NNSR)	Kept, some language updated
		for areas designated nonattainment on or after	requirements for areas designated	
		May 18, 1998	nonattainment	
31.4	31.4	Preconstruction review permit program	Preconstruction review permit program	Kept
31.5 - 31.8	31.5 - 31.8	Reserved	Reserved	Kept
31.9	31.9	Actuals PALs	Actuals PALs	Kept, some language updated
31.10	31.10	Validity of rules	Validity of rules	Kept
31.11 - 31.19	N/A	Reserved	N/A	Rescinded and removed
31.20	N/A	Special requirements for nonattainment areas	N/A	Rescinded and removed
		designated before May 18, 1998		
	In. 10		1	
32	N/A	AFO Field Study	N/A	Rescinded Ch. 32. (Reserved)
32.1	N/A	Animal feeding operations field study	N/A	Rescinded, reserved, and language removed
32.2	N/A	Definitions	N/A	Rescinded, reserved, and language removed
32.3	N/A	Exceedance of the health effects value (HEV) for	N/A	Rescinded, reserved, and language removed
22.4	21/2	hydrogen sulfide	N/A	Destination of subtraction of subtractions and
32.4	N/A	Exceedance of the health effects standard (HES)	N/A	Rescinded, reserved, and language removed
22.5	N/A	for hydrogen sulfide	N/A	Rescinded, reserved, and language removed
32.5	IN/A	Iowa Air Sampling Manual	N/A	rescribed, reserved, and language removed
33	33	Special regulations and construction permit	Construction permit requirements for major	Kont
33	33	-		in the purious section of the purious section is a section of the purious section of the pu
		requirements for major stationary	stationary sources—Prevention of	
		sources—Prevention of significant	significant deterioration (PSD)	
		deterioration (PSD) of air quality		
33.1	33.1	Purpose	Purpose	Kept, some language updated
33.2	33.2	Reserved	Reserved	Kept
33.3	33.3	Special construction permit requirements for	PSD construction permit requirements for major	Kept, some language updated
		major stationary sources in areas designated	stationary sources	
		attainment or unclassified (PSD)		
33.4 - 33.8	33.4 - 33.8	Reserved	Reserved	Kept
33.9	33.9	Plantwide applicability limitations (PALs)	Plantwide applicability limitations (PALs)	Kept, some language updated
33.10 IRM 06/19/2024	33.10	Exceptions to adoption by reference	Exceptions to adoption by reference	Kept, some language updated

33.10 | 33.10 | Exceptions to adoption by reference | Exceptions to adoption by reference | Kept, some language updated | JRM 06/19/2024

<b>Previous Chapter</b>	Current	Previous Title and	Current Title and	Actions Taken
-	Chapter	Description (Prior to 5/15/2024)	Description	
5/15/2024)	-	Description (Filor to 3/13/2024)	Description	
5/15/2024)	Number			
34	N/A	Emissions Trading-CAIR-CAMR	N/A	Rescinded Ch. 34. (Reserved)
34.1	N/A	Purpose	N/A	Rescinded, reserved, and language removed
34.2 - 34.199	N/A	Reserved	N/A	Rescinded, reserved, and language removed
34.200	N/A	Provisions for air emissions trading and other	N/A	Rescinded, reserved, and language removed
		requirements for the Clean Air Interstate Rule		
		(CAIR) - rescinded		
34.201	N/A	CAIR NOx annual trading program general	N/A	Rescinded, reserved, and language removed
		provisions - rescinded		
34.202	N/A	CAIR designated representative for CAIR NOx	N/A	Rescinded, reserved, and language removed
		sources - rescinded		
34.203	N/A	Permits - rescinded	N/A	Rescinded, reserved, and language removed
34.204	N/A	Reserved	N/A	Rescinded, reserved, and language removed
34.205	N/A	CAIR NOx allowance allocations - rescinded	N/A	Rescinded, reserved, and language removed
34.206	N/A	CAIR NOx allowance tracking system - rescinded	N/A	Rescinded, reserved, and language removed
34.207	N/A	CAIR NOx allowance transfers - rescinded	N/A	Rescinded, reserved, and language removed
34.208	N/A	Monitoring and reporting - rescinded	N/A	Rescinded, reserved, and language removed
34.209	N/A	CAIR NOx opt-in units - rescinded	N/A	Rescinded, reserved, and language removed
34.210	N/A	CAIR SO2 trading program - rescinded	N/A	Rescinded, reserved, and language removed
34.211 - 34.219	N/A	Reserved	N/A	Rescinded, reserved, and language removed
34.220	N/A	CAIR NOx ozone season trading program - rescinded	N/A	Rescinded, reserved, and language removed
34.221	N/A	CAIR NOx ozone season trading program general	N/A	Rescinded, reserved, and language removed
		provisions - rescinded		
34.222	N/A	CAIR designated representative for CAIR NOx ozone season sources - rescinded	N/A	Rescinded, reserved, and language removed
34.223	N/A	CAIR NOx ozone season permits - rescinded	N/A	Rescinded, reserved, and language removed
34.224	N/A	Reserved	N/A	Rescinded, reserved, and language removed
34.225	N/A	CAIR NOx ozone season allowance allocations -	N/A	Rescinded, reserved, and language removed
5225	,	rescinded	''	nessinaes) reserves) una language removes
34.226	N/A	CAIR NOx ozone season allowance tracking	N/A	Rescinded, reserved, and language removed
	'	system - rescinded	'	3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3
34.227	N/A	CAIR NOx ozone season allowance transfers -	N/A	Rescinded, reserved, and language removed
		rescinded		
34.228	N/A	CAIR NOx ozone season monitoring and reporting	N/A	Rescinded, reserved, and language removed
		- rescinded		
34.229	N/A	CAIR NOx ozone season opt-in units - rescinded	N/A	Rescinded, reserved, and language removed
34.230 - 34.299	N/A	Reserved	N/A	Rescinded, reserved, and language removed
34.300	N/A	Provisions for air emissions trading and other	N/A	Rescinded, reserved, and language removed
		requirements for the Clean Air Mercury Rule (CAMR) - rescinded		
34.301	N/A	Mercury (Hg) budget trading program general	N/A	Rescinded, reserved, and language removed
34.302	N/A	provisions - rescinded  Hg designated representative for Hg budget	N/A	Rescinded, reserved, and language removed
34.302	IN/A	sources - rescinded	14/5	nescriueu, reserveu, anu ranguage removeu
34.303	N/A	General Hg budget trading program permit	N/A	Rescinded, reserved, and language removed
34.303	IN/A	requirements - rescinded	14/7	nescinaea, reservea, ana iangaage removea
34.304	N/A	Hg allowance allocations - rescinded	N/A	Rescinded, reserved, and language removed
34.305	N/A N/A	Hg allowance tracking system - rescinded	N/A	Rescinded, reserved, and language removed  Rescinded, reserved, and language removed
34.303	IN/A	ing anowance tracking system - resultueu	IN/A	Incominacu, reserveu, anu language removeu

#### AQB Rule Tracking Crosswalk

34.306	N/A	Hg allowance transfers - rescinded	N/A	Rescinded, reserved, and language removed
<b>Previous Chapter</b>	Current	Previous Title and	Current Title and	Actions Taken
Number (Prior to 5/15/2024)	Chapter Number	Description (Prior to 5/15/2024)	Description	
34.307	N/A	Monitoring and reporting - rescinded	N/A	Rescinded, reserved, and language removed
34.308	N/A	Performance specifications - rescinded	N/A	Rescinded, reserved, and language removed

35	N/A	Grant Assistance Programs	N/A	Rescinded Ch. 35. (Reserved)
35.1	N/A	Purpose	N/A	Rescinded, reserved, and language removed
35.2	N/A	Definitions	N/A	Rescinded, reserved, and language removed
35.3	N/A	Role of the department of natural resources	N/A	Rescinded, reserved, and language removed
35.4	N/A	Eligible projects	N/A	Rescinded, reserved, and language removed
35.5	N/A	Forms	N/A	Rescinded, reserved, and language removed
35.6	N/A	Project selection	N/A	Rescinded, reserved, and language removed
35.7	N/A	Funding sources	N/A	Rescinded, reserved, and language removed
35.8	N/A	Type of financial assistance	N/A	Rescinded, reserved, and language removed
35.9	N/A	Term of loans	N/A	Rescinded, reserved, and language removed
35.10	N/A	Reduced award	N/A	Rescinded, reserved, and language removed
35.11	N/A	Fund disbursement limitations	N/A	Rescinded, reserved, and language removed
35.12	N/A	Applicant cost share	N/A	Rescinded, reserved, and language removed
35.13	N/A	Eligible costs	N/A	Rescinded, reserved, and language removed
35.14	N/A	Ineligible costs	N/A	Rescinded, reserved, and language removed
35.15	N/A	Written agreement	N/A	Rescinded, reserved, and language removed
35.16	N/A	Financial assistance denial	N/A	Rescinded, reserved, and language removed

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