



# STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR  
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES  
CHUCK GIPP, DIRECTOR

May 17, 2016

Mark J. Hague  
Regional Administrator  
Region 7, U.S. Environmental Protection Agency  
11201 Renner Blvd  
Lenexa, KS 66219

Dear Regional Administrator Hague:

The Iowa Department of Natural Resources (DNR) requests that the U.S. Environmental Protection Agency (EPA) approve the attached State Implementation Plan (SIP) revision designed to prevent future violations of the 2010 1-hour sulfur dioxide (SO<sub>2</sub>) National Ambient Air Quality Standard (NAAQS) in Muscatine, Iowa. The DNR developed the SIP revision in response to the SO<sub>2</sub> nonattainment designation for a portion of Muscatine County, published in the Federal Register August 5, 2013, (78 FR 47191) with an effective date of October 4, 2013. The submission addresses all required nonattainment planning elements and conforms with the requirements of 40 CFR 51, Appendix V.

The SIP revision includes a modeling demonstration showing the reductions needed to attain and maintain the 1-hour SO<sub>2</sub> NAAQS, control measures meeting RACT and RACM requirements, enforceable commitments to implement contingency measures if triggered, and other required nonattainment plan provisions. The control measures are enforceable and contain procedures for monitoring compliance through conditions specified in air construction permits. Attachments B, C, and D contain the air construction permits issued to Grain Processing Corporation, Muscatine Power and Water, and Monsanto Company, respectively. Each air construction permit as it affects SO<sub>2</sub> is included for adoption into the SIP, with the exception of permit Condition 6.

Regarding permit Condition 6, Iowa is one of 36 states affected by a SIP Call published June 12, 2015, (80 FR 33839) regarding provisions applying to excess emissions during periods of startup, shutdown, and malfunction (SSM). Under the SIP Call, EPA found 567 – Iowa Administrative Code (IAC) 24.1(1) to be substantially inadequate. The subrule provides that excess emissions during periods of startup and shutdown are not a violation of an emission standard if good practices for minimizing emissions are followed. Since Condition 6 of each of the 58 included air permits contains SSM language from the subrule that is subject to the SIP call, the DNR is requesting that EPA not act on permit Condition 6 of the included permits.

I look forward to the U.S. EPA's approval and promulgation of a SIP revision for the State of Iowa in this matter. If you have any questions regarding this submittal, please contact Matthew Johnson at [matthew.johnson@dnr.iowa.gov](mailto:matthew.johnson@dnr.iowa.gov) or (515) 725-9554.

Sincerely,

A handwritten signature in black ink that reads "Chuck Gipp". The signature is written in a cursive, flowing style. The "C" is large and loops around the "h". The "G" is also large and loops around the "i". The "p" is smaller and ends with a small loop.

Chuck Gipp

Director

Iowa Department of Natural Resources

Enclosures