Iowa Department of Natural Resources
Draft Title V Operating Permit Fact Sheet

This document has been prepared to fulfill the public participation requirements of 40 CFR Part 70 and 567 Iowa Administrative Code (IAC) 24.107(6). 40 CFR Part 70 contains operating permit regulations pursuant to Title V of the Clean Air Act.

The Iowa Department of Natural Resources (DNR) finds that:

1. Siemens Gamesa Renewable Energy, Inc., located at 2597 Hwy 61 South, Fort Madison, IA 52627 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Anthony McDowell.
2. Siemens Gamesa Renewable Energy, Inc., is a turbine generator blade manufacturer. This facility consists of 14 emission units with potential emissions of:

Pollutant	**Abbreviation**	**Potential Emissions** (Tons per Year)
Particulate Matter (≤ 2.5 μm)	$PM_{2.5}$	6.01
Particulate Matter (≤ 10 μm)	PM_{10}	8.02
Particulate Matter	PM	9.49
Sulfur Dioxide	SO_2	0.01
Nitrogen Oxides	NO_x	1.88
Volatile Organic Compounds	VOC	230.10
Carbon Monoxide	CO	1.58
Lead	Lead	0.00
Hazardous Air Pollutants [(1)]	HAP	147.12

[(1)] May include the following: Benzene, cumene, ethyl benzene, hexamethylene diisocyanate, hexane, manganese, methyl isobutyl ketone, naphthalene, phenol, toluene, and xylenes.

3. Siemens Gamesa Renewable Energy, Inc., submitted a Title V Operating Permit renewal application on August 21, 2025. Based on the information provided in these documents, DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 24.107.
4. DNR has complied with the procedures set forth in 567 IAC 24.107, including those regarding public notice, opportunity for public hearing, and notification of EPA and surrounding state and local air pollution programs.

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

1. The public comment period for the draft permit will run from February 12, 2026 through March 14, 2026. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Zane Peters at the DNR address shown below. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period.
2. Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to Zane Peters at the DNR address shown below.
3. DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the renewal application. The responsiveness summary and the final permit will be available to the public upon request.

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DNR concludes that:

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

Title V Review Notes

Applicant:	**Siemens Gamesa Renewable Energy Inc.**
SIC Code:	**3511 (Turbine Generator Blades)**
City:	Fort Madison
County:	Lee (F.O. #6)
EIQ#:	92-6809
Facility#:	56-02-053
Permit #:	11-TV-001R3
Reviewer:	Zane Peters
Date:	11/24/2025

Facility Identification

Facility Name:	Siemens Gamesa Renewable Energy Inc.
Facility Location:	2597 Hwy 61 South, Fort Madison, IA 52627
Responsible Official:	Anthony McDowell
Phone:	(319) 463-2166

Background

Siemens Gamesa Renewable Energy, Inc. is a Turbine Generator Blades plant (SIC 3511). This facility has twenty (20) significant emission units and fourteen (14) insignificant emission points. The facility submitted their application to renew their Part 70 Title V permit on 08/21/2025.

Regulatory Status

Table 1. Title V Major Source by Pollutant

Pollutant	Major for Title V?
PM_{10}	☐
SO_2	☐
NO_x	☐
VOC	☒
CO	☐
Lead	☐
Individual HAP	☒
Total HAPs	☒

HAPs include Phenol, Xylene, Methyl Isobutyl Ketone, Toluene, Ethyl Benzene and Hexamethylene-1,6-Diisocyanate, Cumene

Program Applicability

PSD: No
Part 61 NESHAP: No
Part 63 NESHAP: YES

1. 40 CFR Part 63 Subpart A – General Provisions
2. 40 CFR Part 63 Subpart PPPP – *National Emission Standard for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products*
3. 40 CFR 63 Subpart DDDDD –*National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.*

Acid Rain: NO
Stratospheric Ozone Protection: YES
Prevention of Accidental Releases: NO
Part 64 Compliance assurance monitoring (CAM): No emission units qualified for CAM.

Table NSPS/NESHAP Applicability

EP	EU	Source Description	NSPS and NESHAP applicability
EP-AB1	EU-AB1	Abrasive Blasting	NESHAP Subpart A; PPPP
EP-D1	EU-D1	Machine Drilling	None
EP-D2	EU-D2	Machine Drilling	None
EP-F2	EU-F2	Finishing	NESHAP Subpart A; PPPP
EP-ML1	EU-ML1	Blade Molding	Is of the source type affected by NESHAP Subpart WWWW
EP-PB1	EU-PB1	Paint Booth	NESHAP Subpart A; PPPP
EP-PB2A.1	EU-PB2	Paint Booth #2/Cure Oven	NESHAP Subpart A; PPPP
EP-PB2A.2	EU-PB2	Paint Booth #2/Cure Oven	NESHAP Subpart A; PPPP
EP-PB2B.1	EU-PB2	Paint Booth #2/Cure Oven	NESHAP Subpart A; PPPP
EP-PB2B.2	EU-PB2	Paint Booth #2/Cure Oven	NESHAP Subpart A; PPPP
EP-PK1	EU-PK1	Paint Kitchen #1	NESHAP Subpart A; PPPP
EP-PK2	EU-PK2	Paint Kitchen #2	NESHAP Subpart A; PPPP
EP-24	EU-24	Four New Boilers	None
EP-21	EU-21	Primer Blade Curing Oven	NESHAP Subpart A; DDDDD
EP-27	EU-27	Top-Coat Blade Curing Oven	NESHAP Subpart A; DDDDD
EP-29	EU-29	Bay 7 Painting Area	NESHAP Subpart A; PPPP
EP-30	EU-30	Green Blade Curing Oven	NESHAP Subpart A; DDDDD

Plant-Wide Limit

There is a Plant-Wide VOC Limit of 230.00 ton/yr on the coating operations at the facility. This emission limit does not include VOC emissions from combustion sources and sources meeting a qualifying exemption found in 567 IAC 22.1(2).

Changes Since the Last Issuance

General Changes

- Relevant permit numbers and dates have been updated throughout the permit
- The phone number for the Responsible Official has been updated
- The Insignificant Activities list has been updated in accordance with the permit application renewal package
- Rule references updated in accordance with Executive Order 10 (EO10)

Emission Point Specific Changes

- EP-30 Green Blade Curing Oven has been added to the permit in accordance with the permit application package. This emission point is exempted from construction permitting (pp. 42-43)

Periodic Monitoring

All periodic monitoring requirements are in accordance with the Department's Periodic Monitoring Guidance Document.

EP-AB1:

This emission point is used for abrasive blasting. Associated emission unit is EU-AB1. Control equipment associated with EP-AB1 is CE-AB1, a baghouse. Criteria pollutants include PM10, PM, and VOC. Opacity limit is 40%. VOC has a plant-wide limit of 230.00 ton/yr. The facility shall not emit over 0.16 lb organic HAPs per pound solid applied. This emission point is subject to NESHAP Subpart A and Subpart PPPP. Due to the nature of the emission point, the Agency O&M plan will be upheld.

EP-D1:

This emission point is used for drilling and machining. Associated emission unit is EU-D1. Control equipment associated with EP-D1 is CE-D1-2, a baghouse. Criteria pollutant is PM with a limit of 0.1 gr/dscf. Opacity limit is 40%. This emission point is not subject to NSPS or NESHAP. Due to the nature of the emission point, the Facility O&M plan will be upheld.

EP-D2:

This emission point is used for drilling and machining. Associated emission unit is EU-D2. Control equipment associated with EP-D2 is CE-D2, a baghouse. Criteria pollutant is PM with a limit of 0.1 gr/dscf. Opacity limit is 40%. This emission point is not subject to NSPS or NESHAP. Due to the nature of the emission point, the Facility O&M plan will be upheld.

EP-F2:
This emission point is used as the finishing line. Associated emission unit is EU-F2. No control equipment is associated with EP-F2. VOC has a plant-wide limit of 230.00 ton/yr. The facility shall not emit over 0.16 lb organic HAPs per pound solid applied. This emission point is subject to NESHAP Subpart A and Subpart PPPP. No Periodic Monitoring is required at this time.

EP-ML1:
This emission point is used for blade molding. Associated emission unit is EU-ML1. No control equipment is associated with EP-ML1. Criteria pollutants include PM10, PM and VOC. Opacity limit is 40%. PM10 limit is 1.0 lb/hr and PM limit is 0.1 gr/dscf. VOC has a plant-wide limit of 230.00 ton/yr. This emission unit is of the source type regulated by Subpart WWWW – National Emission Standards for Hazardous Air Pollutants (NESHAP): Reinforced Plastic Composites Production. The facility, however, is not subject to this subpart since its reinforced plastic composites operations use less than 1.2 tons per year of thermoset resins and gel coats that contain styrene combined [40 CFR § 63.5785(d)]. Should the facility use more than 1.2 tons per year of thermoset resins and gel coats that contain styrene combined, the facility will become subject to the requirements of Subpart WWWW. No Periodic Monitoring is required at this time.

EP-PB1:
This emission point is used as paint booth. Associated emission unit is EU-PB1. Associated control equipment is CE-PB1, paint filters. Criteria pollutants include PM10, PM and VOC. Opacity limit is 40%. PM10 limit is 3.29 lb/hr and PM limits are 0.01 gr/dscf and 3.29 lb/hr. VOC has a plant-wide limit of 230.00 ton/yr. The facility shall not emit over 0.16 lb organic HAPs per pound solid applied. This emission point is subject to NESHAP Subpart A and Subpart PPPP.
Due to the nature of the emission point, the Agency O&M plan will be upheld.

EP-PB 2A.1, EP-PB2A.2, EP-PB2B.1 and EP-PB2B.2
These emission points are used as paint booths. The associated emission unit is EU-PB2. Associated control equipment is CE-PB2A.1through CE-PB2B.2, which are paint filters. Criteria pollutants include PM10, PM and VOC. Opacity limit is 40%. PM10 limit is 0.82 lb/hr and PM limits are 0.01 gr/dscf and 0.82 lb/hr. VOC has a plant-wide limit of 230.00 ton/yr. The facility shall not emit over 0.16 lb organic HAPs per pound solid applied. These emission points are subject to NESHAP Subpart A and Subpart PPPP. Due to the Department's policy towards spraying operations, the Agency O&M plan will be upheld.

EP-PK1 & EP-PK2:
These emission points are paint kitchens and grouped together in the Title V permit, they emit through EU-PK1 & EU-PK2, and have the same physical characteristics. There is no control equipment associated with these emission points. The facility shall not emit over 0.16 lb organic HAPs per pound solid applied. These emission points are subject to NESHAP Subpart A and Subpart PPPP. No Periodic Monitoring is required at this time.

EP-RF5, EP-RF6, EP-RF7 and EP-RF8:
These emission points are grouped together in the Title V permit, they emit through EU-RF5, and have the same physical characteristics. No control equipment associated with these emission points. VOC is the only criteria pollutant and has a plant-wide limit of 230.00 ton/yr. The facility shall not emit over 0.16 lb organic HAPs per pound solid applied. These emission points are subject to NESHAP Subpart A and Subpart PPPP. Roll on painting was added to the description. No Periodic Monitoring is required at this time.

EP-21 & EP-27:
These emission points, Primer Blade Curing Oven and Top-Coat Blade Curing Oven are natural gas fired Blade Curing Ovens. They are grouped together in the Title V permit, they emit through EU-21 & EU-27, and have the same physical characteristics. There is no control equipment associated with these emission points. Opacity is 40%. These emission points are subject to NESHAP Subpart A and Subpart DDDDD. No Periodic Monitoring is required at this time.

EP-29:
Bay 7 Paint Area has both roll on and spray on capabilities. There are paint filters in place for the control equipment. Construction permit 20-A-092 contains appropriate control equipment monitoring requirements so an additional Periodic Monitoring is not required. There is a 40% opacity limit set on the source and has an indicator opacity set at exceeding No Visible Emissions. PM has a limit of 0.01gr/dscf and HAPs is limited to 0.16 lb HAP/lb solids. Emission point is subject to NESHAP subpart PPPP. The source is vented internally and only requires testing if the VOC emissions are being assumed under 100%.

EP-30
This emission point is natural gas fired Blade Curing Oven. There is no control equipment associated with this emission point. Opacity is 40%. These emission points are subject to NESHAP Subpart A and Subpart DDDDD. No Periodic Monitoring is required at this time.

Stack Testing
Stack testing is not required in the current construction permits. EP 29 only requires a stack test if the facility assumes that VOC emissions are less than 100%. Facility has said they will assume the 100% emissions and have no plans for a test. Daily recordkeeping of VOCs is a requirement. Periodic Monitoring Guidance does not require stack testing. All the stack tests required in construction permits have been performed and are in compliance.

Other Notes

There is a Plant-Wide VOC Limit of 230.00 ton/yr on the coating operations at the facility.

EP-17:

This emission point is a 300 hp diesel emergency generator.
This emission unit is considered an affected source under NESHAP Subpart ZZZZ. According to the 40 CFR Part 63 Subpart ZZZZ Applicability Flowchart, the facility should meet the requirements of this part by meeting the requirements of 40 CFR Part 60 Subpart IIII. No further requirements apply for this engine under 40 CFR Part 63 Subpart ZZZZ. Since this emergency engine was manufactured before April 1, 2006 (as indicated in the NSPS IIII Registration Form), it is not subject to the requirements in NSPS IIII. Therefore; this unit qualifies as an "insignificant activity" as defined in 567 IAC 22.103(2) "b" and has been listed in the "Insignificant Activities" list in Title V permit.

EP-24:

This emission point represents four natural gas boilers grouped together in the Title V permit, they emit through EU-24, and have the same physical characteristics. EU-24 (four boilers) were removed from the significant activity list and was placed on the insignificant activity list. The reasoning by the facility was in their cover letter, and is stated below.

"EU 24 consists of four (4) boilers, each rated at 2 MMBtu/hr. Each of the four (4) boilers have a capacity of less than 120 gallons and does not produce steam. EU 24 was incorporated into the previous Title V permit because it was believed to be subject to 40 CFR 63 Subpart DDDDD as it was not believed to meet the definition of a hot water heater. While each boiler has a capacity of less than 120 gallons and is not capable of producing steam, each boiler heat input capacity is greater than 1.6 MMBtu/hr. However, guidance released on January 14, 2016 states that the storage capacity and heat input capacity threshold are independent of each other. Therefore, because each boiler associated with EU 24 has a capacity of less than 120 gallons and does not produce steam, EU 24 is not subject to 40 CFR 63 Subpart DDDDD. Siemens Gamesa Renewable Energy, Inc. requests that EU 24 be characterized as an insignificant unit per IAC 567 22.103(2)(b)(1), as each boiler associated with EU 24 uses indirect heating, combusts natural gas, and has a heat input capacity of less than 10 MMBtu/hr."