

## **PUBLIC NOTICE**

The Iowa Department of Natural Resources (DNR) is proposing to renew the Title V Operating Permit for Siemens Gamesa Renewable Energy, Inc. This facility is located at 2597 Hwy 61 South, Fort Madison, IA 52627. DNR is currently reviewing an application for renewal submitted by Siemens Gamesa Renewable Energy, Inc. to operate their existing turbine generator blade manufacturing facility.

Siemens Gamesa Renewable Energy, Inc. is required to obtain a Title V Operating Permit pursuant to 567 Iowa Administrative Code (IAC) 24.101. This facility has the potential to emit the following air pollutants annually:

PM-2.5 (particulate matter 2.5 microns or less in diameter): 6.01 tons

PM-10 (particulate matter ten microns or less in diameter): 8.02 tons

Particulate Matter: 9.49 tons

Sulfur Dioxide: 0.01 tons

Nitrogen Oxides: 1.88 tons

Volatile Organic Compounds: 230.10 tons

Carbon Monoxide: 1.58 tons

Lead: 0.00 tons

Hazardous Air Pollutants: 147.12 tons

Based on the information provided in the Title V Operating Permit renewal application, the DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 24.107.

A copy of the Public Notice is available for public inspection at the:

Fort Madison Public Library  
1920 Avenue E  
Fort Madison, IA 52627  
Phone: 319-372-5721

These documents are also available on the Air Quality Bureau's website at:

[www.iowadnr.gov/titlev-draft](http://www.iowadnr.gov/titlev-draft)

For additional information or for a copy of the draft permit or fact sheet contact:

Zane Peters  
Iowa Department of Natural Resources - Air Quality Bureau  
6200 Park  
Ste #200  
Des Moines, Iowa 50321  
Phone: (515) 808-0458  
E-mail: zane.peters@dnr.iowa.gov

A complete record of the permit review, including the renewal application and the draft permit, is available for public inspection Monday-Friday, 8:00 a.m. - 4:30 p.m., at the DNR address shown above.

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 above. 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.

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 above.

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.

Individuals with disabilities or limited English proficiency are encouraged to participate in all DNR activities, including submitting public comments. If a reasonable accommodation or language services are needed to participate, contact the Air Quality Bureau staff member listed or Relay Iowa TTY Service at 800-735-7942 in advance to advise them of your specific needs. DNR's language access and disability nondiscrimination plans are available at <https://www.iowadnr.gov/about/nondiscrimination-accessibility-language-access>.

**Iowa Department of Natural Resources  
Title V Operating Permit**

**Name of Permitted Facility: Siemens Gamesa Renewable Energy,  
Inc.**

**Facility Location: 2597 Hwy 61 South, Fort Madison, IA 52627**

**Air Quality Operating Permit Number: 11-TV-001R3**

**Expiration Date:**

**Permit Renewal Application Deadline:**

**EIQ Number: 92-6809**

**Facility File Number: 56-02-053**

---

**Responsible Official**

**Name: Anthony McDowell**

**Title: Plant Manager**

**Mailing Address: 2597 Hwy 61 South, Fort Madison, IA 52627**

**Phone #: (515) 779-9084**

**Permit Contact Person for the Facility**

**Name: Michelle Mutchler**

**Title: EHS Manager**

**Mailing Address: 2597 Hwy 61 South, Fort Madison, IA 52627**

**Phone #: (319) 669-0126**

---

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

# Table of Contents

<b>I. Facility Description and Equipment List .....</b>	<b>4</b>
<b>II. Plant - Wide Conditions.....</b>	<b>6</b>
<b>III. Emission Point Specific Conditions .....</b>	<b>9</b>
<b>IV. General Conditions.....</b>	<b>44</b>
G1.Duty to Comply	
G2.Permit Expiration	
G3.Certification Requirement for Title V Related Documents	
G4.Annual Compliance Certification	
G5.Semi-Annual Monitoring Report	
G6.Annual Fee	
G7.Inspection of Premises, Records, Equipment, Methods and Discharges	
G8.Duty to Provide Information	
G9.General Maintenance and Repair Duties	
G10. Recordkeeping Requirements for Compliance Monitoring	
G11. Evidence used in establishing that a violation has or is occurring.	
G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification	
G13. Hazardous Release	
G14. Excess Emissions and Excess Emissions Reporting Requirements	
G15. Permit Deviation Reporting Requirements	
G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations	
G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification	
G18. Duty to Modify a Title V Permit	
G19. Duty to Obtain Construction Permits	
G20. Asbestos	
G21. Open Burning	
G22. Acid Rain (Title IV) Emissions Allowances	
G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements	
G24. Permit Reopenings	
G25. Permit Shield	
G26. Severability	
G27. Property Rights	
G28. Transferability	
G29. Disclaimer	
G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification	
G31. Prevention of Air Pollution Emergency Episodes	
G32. Contacts List	
<b>V. Appendix A: Links to Standards.....</b>	<b>58</b>
<b>V. Appendix B: Executive Order 10 (EO10) Rules Crosswalk.....</b>	<b>59</b>

## Abbreviations

acfm.....	actual cubic feet per minute
CFR.....	Code of Federal Regulation
CE .....	control equipment
CEM.....	continuous emission monitor
°F.....	degrees Fahrenheit
EIQ.....	emissions inventory questionnaire
EP .....	emission point
EU .....	emission unit
gr./dscf .....	grains per dry standard cubic foot
IAC.....	Iowa Administrative Code
IDNR.....	Iowa Department of Natural Resources
MVAC.....	motor vehicle air conditioner
NAICS.....	North American Industry Classification System
NSPS .....	new source performance standard
NESHAP.....	National Emission Standards for Hazardous Air Pollutants
ppmv .....	parts per million by volume
lb./hr .....	pounds per hour
lb./MMBtu .....	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

### Pollutants

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
VOC .....	volatile organic compound
CO.....	carbon monoxide
HAP.....	hazardous air pollutant

# I. Facility Description and Equipment List

Facility Name: Siemens Gamesa Renewable Energy, Inc.

Permit Number: 11-TV-001R3

Facility Description: Turbine Generator Blades (SIC 3511)

---

## Equipment List

---

<b>Emission Point Number</b>	<b>Emission Unit Number</b>	<b>Emission Unit Description</b>	<b>IDNR Construction Permit Number</b>
EP-AB1	EU-AB1	Abrasive Blasting	07-A-265-S1
EP-D1	EU-D1	Machine Drilling	07-A-264-S4
EP-D2	EU-D2	Machine Drilling	08-A-290-S1
EP-F2	EU-F2	Finishing and Roll-on Paint Operations	08-A-294-S2
EP-ML1	EU-ML1	Blade Molding	07-A-260-S1
EP-PB1	EU-PB1	Paint Booth#1/Cure Oven	07-A-266-S4
EP-PB2A.1	EU-PB2	Paint Booth #2/Cure Oven	11-A-256-S2
EP-PB2A.2			11-A-257-S2
EP-PB2B.1			11-A-258-S2
EP-PB2B.2			11-A-259-S2
EP-PK1	EU-PK1	Paint Kitchen #1	NA
EP-PK2	EU-PK2	Paint Kitchen #2	NA
EP-RF5	EU-RF5	Rough Finishing	08-A-291-S2
EP-RF6		Rough Finishing	08-A-292-S2
EP-RF7		Rough Finishing	08-A-293-S2
EP-RF8		Rough Finishing	09-A-144-S1
EP-21	EU-21	Primer Blade Curing Oven	NA
EP-27	EU-27	Top-Coat Blade Curing Oven	NA
EP-29	EU-29	Bay 7 Paint Area	20-A-092
EP-30	EU-30	Green Blade Curing Oven	NA

---

## Insignificant Activities Equipment List

---

Insignificant Emission Unit Number	Insignificant Emission Unit Description
EU10-13	Natural Gas Heaters (39 heaters in total)
EU-15	Turbo Recycler
EU-16	Solvent Reclaim System
EU-17	Diesel Fuel Emergency Generator
EU-22	Cooling Tower #1
EU-24	Four (4) 2 MMBtu/hr Natural Gas Boilers (<120 gallons capacity)
EU-26	Cooling Tower #2
EU-31	North, South, and Prime Cure Boiler Ovens
EU-32	PB1 Primer Booth Down Draft Heated Ventilation
EU-33	PB2 Top-Coat Booth Down Draft Heated Ventilation
EU-34	Sandblast Heated Ventilation
T1	500 Gallon Gasoline Tank
T2	1,000 Gallon Diesel Tank
T3	1,000 Gallon Diesel Tank

## II. Plant-Wide Conditions

Facility Name: Siemens Gamesa Renewable Energy, Inc.

Permit Number: 11-TV-001R3

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: 5 years from permit issuance date

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"

Fugitive Dust: Attainment and Unclassified Areas - 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, with the exception of farming operations or dust generated by ordinary travel on unpaved public roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance, as defined in Iowa Code section 657.1, from becoming airborne. 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 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 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, fertilizers 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.

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

---

#### **40 CFR 63 Subpart A Requirements**

This facility is an affected source and these General Provisions apply to the facility. Applicable requirements are incorporated in the Emission Point Specific conditions.

Authority for Requirements: 40 CFR 63 Subpart A

#### **40 CFR 63 Subpart P PPP Requirements**

This facility is subject to National Emission Standard for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products. The affected units are EP-AB1, EP-F2, EP-PB1, EP-RF5, EP-RF6, EP-RF7, EP-RF8, EP-PK1, EP-PK2, EP-PB2A.1, EP-PB2A.2, EP-PB2B.1 and EP-PB2B.2. Applicable requirements are incorporated in the Emission Point Specific conditions.

Authority for Requirements: 40 CFR 63 Subpart PPP

567 IAC 23.1(4) "cp"

#### **40 CFR 63 Subpart D D D D D Requirements**

The process heaters and boilers at this facility are subject to the requirements of 40 CFR, Part 63, Subpart D D D D D, "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters". The affected units are EP-21, 27, & 30.

Authority for Requirement: 40 CFR 63, Subpart D D D D D

---

#### **Facility-Wide Emission Limits**

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 230.0 ton/yr <sup>(1)</sup>

Authority for Requirement: See "Emission Point-Specific Conditions" for permit citations

<sup>(1)</sup> This emission limit does not include VOC emissions from combustion sources and sources meeting a qualifying exemption found in 567 IAC 22.1(2).

### III. Emission Point-Specific Conditions

Facility Name: Siemens Gamesa Renewable Energy, Inc.  
Permit Number: 11-TV-001R3

---

#### **Emission Point ID Number: EP-AB1**

##### Associated Equipment

Associated Emission Unit ID Numbers: EU-AB1  
Emissions Control Equipment ID Number: CE-AB1  
Emissions Control Equipment Description: Baghouse  
Continuous Emissions Monitors ID Numbers: None

---

Emission Unit vented through this Emission Point: EU-AB1  
Emission Unit Description: Abrasive Blasting  
Raw Material/Fuel: Abrasive  
Rated Capacity: 36 tons of abrasive per day

#### **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%<sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 07-A-265-S1  
567 IAC 23.3(2) "d"

<sup>(1)</sup>An exceedance of the indicator opacity of "25%" 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<sub>10</sub>)

Emission Limit(s): 0.80 lb/hr

Authority for Requirement: DNR Construction Permit 07-A-265-S1

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: DNR Construction Permit 07-A-265-S1  
567 IAC 23.3(2) "a"

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): See "Plant-Wide Conditions"

Authority for Requirement: DNR Construction Permit 07-A-265-S1

Pollutant: Organic HAPs

Emission Limit(s): 0.16 lb HAP/lb Solid

Authority for Requirement: DNR Construction Permit 07-A-265-S1  
40 CFR Part 63 Subpart PPPP  
567 IAC 23.1(4) "cp"

**Operational Limits & Reporting/Record keeping Requirements**

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

*Records shall be kept on site for at least five years and shall be available for inspection by the Department.*

**Reporting and Recordkeeping**

- A. The owner or operator shall keep a log of all materials used in this emission unit and their respective VOC, individual HAP, and total HAP contents.
- B. The owner or operator shall keep a copy of the Material Safety Data Sheet (MSDS) or other product information showing the VOC and HAP contents.
- C. The owner or operator shall record daily the amount of each VOC containing material used at Siemens Gamesa Renewable Energy, Inc. from all operations, excluding combustion sources and sources meeting a qualifying exemption found in 567 IAC 22.1(2), in applicable units of weight/mass or volume. Calculate and record 12-month rolling totals. For the purposes of determining daily usages, the facility may track the amount of each VOC containing material used per blade. Recording the material usage per blade shall be considered equivalent to daily recordkeeping for this operation.
- D. Calculate the VOC emissions from all operations, excluding combustion sources and sources meeting a qualifying exemption found in 567 IAC 22.1(2), in tons for Siemens Gamesa Renewable Energy, Inc. on a monthly basis and keep a 12-month rolling total. Records for VOC emissions shall be kept on a monthly basis until the VOC emissions exceed 173.0 tons/yr. At this point the owner or operator shall immediately begin keeping a 365-day rolling total amount of VOC emitted at this facility. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned to below 173.0 tons/yr for VOC.
- E. The permittee shall submit notifications as required by §63.4510; the permittee shall submit required reports in accordance with §63.4520.
- F. The permittee shall maintain the necessary records in accordance with §63.4530 and §63.4531.
- G. If using the Compliant Material Option to comply with the HAP limit, the permittee shall follow the requirements of §63.4540, §63.4541, and §63.4542.
- H. If using the Emission Rate without Add-on Control Option to comply with the HAP limit, the permittee shall follow the requirements of §63.4550, §63.4551, and §63.4552.

Authority for Requirement: DNR Construction Permit 07-A-265-S1  
40 CFR 63 Subpart PPPP  
567 IAC 23.1(4)"cp"

**Emission Point Characteristics**

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

- Stack Height, (ft, from the ground): 40
- Stack Opening, (inches): 39×39
- Exhaust Flow Rate (scfm): 9,500
- Exhaust Temperature (°F): Ambient
- Discharge Style: Vertical, Unobstructed
- Authority for Requirement: DNR Construction Permit 07-A-265-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.*

- 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)

## Baghouse Agency Operation and Maintenance Plan

---

Facility:	Siemens Gamesa Renewable Energy, Inc.
EIQ Number	92-6809
Emission Unit:	EU-AB1
Emission Point:	EP-AB1
Control Equipment:	Baghouse

---

### Baghouse Parameters

Baghouse type:	<input checked="" type="checkbox"/> Pulse Jet	<input type="checkbox"/> Reverse Air	<input type="checkbox"/> Shaker
Material handled:	Garnet abrasive		
Moisture problems possible:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Material corrosive:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Operating temperature (°F):	Ambient		

---

### Monitoring Guidelines

The facility makes a commitment to take timely corrective action during periods of excursion where the indicators are out of range. A corrective action may include an investigation of the reason for the excursion, evaluation of the situation and necessary follow-up action to return operation within the indicator range. An excursion is determined by the averaged discrete data point over a period of time. An excursion does not necessarily indicate a violation of an applicable requirement. If the corrective action measures fail to return the indicators to the appropriate range, the facility will report the exceedance to the department and conduct source testing within 90 days of the exceedance to demonstrate compliance with applicable requirements. If the test demonstrates compliance with emission limits then new indicator ranges must be set for monitoring and the new ranges must be incorporated in the operating permit. If the test demonstrates noncompliance with emission limits, then the facility, within 60 days, proposes a schedule to implement corrective action to bring the source into compliance and demonstrate compliance.

### General

Periodic Monitoring is not required during periods of time greater than one day in which the source does not operate.

### Weekly

- Visible emissions shall be observed on a weekly basis to ensure no visible emissions occur during the material handling operation of the unit. If visible emissions are observed this would be an excursion not a violation, and corrective action will be taken as soon as possible, but no later than 8 hours. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity (>40%) is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake readings at approximately 2-hour intervals throughout the day. If unsuccessful that day due to weather, an observation shall be made the following day.

- Check and document the baghouse pressure drop. If the pressure drop falls out of the normal operating range, specified by the manufacturer, corrective action will be taken within 8 hours to return the pressure drop to normal.

Maintain a written record of the observation and any action resulting from the inspection.

### **Monthly**

- Check the cleaning sequence of the baghouse.
- Pulse jet baghouse - check the air delivery system
- Check the hopper functions and performance.

If leaks or abnormal conditions are detected the appropriate measures for remediation will be implemented within eight (8) hours. Maintain a written record of the inspection and any action resulting from the inspection.

### **Quarterly**

- Thoroughly inspect bags for leaks and wear. (Look for obvious holes or tears in the bags.)

If leaks or abnormal conditions are detected the appropriate measures for remediation will be implemented within eight (8) hours. Bag replacement should be documented by identifying the date, time and location of the bag in relationship to the other bags. The location should be identified on an overhead drawing of the bag layout in the baghouse. Maintain a written record of the inspection and any action resulting from the inspection.

### **Semiannual**

- Inspect every 6 months all components that are not subject to wear or plugging, including structural components, housing, ducts and hoods.

If leaks or abnormal conditions are detected the appropriate measures for remediation will be implemented within eight (8) hours. Maintain a written record of the inspection and any action resulting from the inspection.

### **Record Keeping and Reporting**

Maintenance and inspection records will be kept for five years and available upon request.

### **Quality Control**

- The filter equipment will be operated and maintained according to the manufacturer's recommendations.
- An adequate inventory of spare parts shall be kept.

Authority for Requirement: 567 IAC 24.108(3)"b"

## **Emission Point ID Number: EP-D1**

### Associated Equipment

Associated Emission Unit ID Numbers: EU-D1  
Emissions Control Equipment ID Number: CE-D1-2  
Emissions Control Equipment Description: Baghouse  
Continuous Emissions Monitors ID Numbers: None

---

Emission Unit vented through this Emission Point: EU-D1  
Emission Unit Description: Drilling/Machining  
Raw Material/Fuel: Dust  
Rated Capacity: 3,120 wind turbine blades/year

### **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%<sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 07-A-264-S4  
567 IAC 23.3(2) "d"

<sup>(1)</sup>An exceedance of the indicator opacity of "25%" 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): 0.1 gr/dscf

Authority for Requirement: DNR Construction Permit 07-A-264-S4  
567 IAC 23.3(2) "a"

#### **Operational Limits & Reporting/Record keeping Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.*

#### Operating Limits

- A. The Baghouse (CE-D1-2) shall be operated and maintained according to the manufacturer specifications with inspections occurring at a minimum of once per year.

#### Reporting and Recordkeeping

- A. A log of all maintenance and inspection activities performed on the Baghouse (CE-D1-2). This log shall include, but is not necessarily limited to:
  - a. The date and time any inspection and/or maintenance was performed on the Baghouse (CE-D1-2);
  - b. Any issues identified during the inspection and the date each issue was resolved;
  - c. Any issues addressed during the maintenance activities and the date each issue

was resolved; and

d. Identification of the staff member performing the maintenance or inspection.

Authority for Requirement: DNR Construction Permit 07-A-264-S4

**Emission Point Characteristics**

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

Stack Height, (ft, from the ground): 36

Stack Opening, (inches, dia.): 9.84

Exhaust Flow Rate (scfm): 1,750

Exhaust Temperature (°F): Ambient

Discharge Style: Vertical, Obstructed

Authority for Requirement: DNR Construction Permit 07-A-264-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 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

*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 shall 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.*

Authority for Requirement: 567 IAC 24.108(3)

## **Emission Point ID Number: EP-D2**

### Associated Equipment

Associated Emission Unit ID Numbers: EU-D2  
Emissions Control Equipment ID Number: CE-D2  
Emissions Control Equipment Description: Baghouse  
Continuous Emissions Monitors ID Numbers: None

---

Emission Unit vented through this Emission Point: EU-D2  
Emission Unit Description: Drilling/Machining  
Raw Material/Fuel: Dust  
Rated Capacity: 3,120 wind turbine blades/year

### **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%<sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 08-A-290-S1  
567 IAC 23.3(2) "d"

<sup>(1)</sup>An exceedance of the indicator opacity of "25%" 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): 0.1 gr/dscf

Authority for Requirement: DNR Construction Permit 08-A-290-S1  
567 IAC 23.3(2) "a"

**Emission Point Characteristics**

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

- Stack Height, (ft, from the ground): 36
- Stack Opening, (inches, dia.): 9.84
- Exhaust Flow Rate (scfm): 1,177
- Exhaust Temperature (°F): Ambient
- Discharge Style: Vertical, Unobstructed
- Authority for Requirement: DNR Construction Permit 08-A-290-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 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

*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 shall 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.*

Authority for Requirement: 567 IAC 24.108(3)

## **Emission Point ID Number: EP-F2**

### Associated Equipment

Associated Emission Unit ID Numbers: EU-F2  
Emissions Control Equipment ID Number: None  
Emissions Control Equipment Description: None  
Continuous Emissions Monitors ID Numbers: None

---

Emission Unit vented through this Emission Point: EU-F2  
Emission Unit Description: Finishing and Roll-on Paint Operations  
Raw Material/Fuel: Paint, Solvent, Adhesive  
Rated Capacity: 3,120 wind turbine blades/year

### **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%<sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 08-A-294-S2  
567 IAC 23.3(2) "d"

<sup>(1)</sup> An exceedance of the indicator opacity of 10% 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): 0.01 gr/dscf

Authority for Requirement: DNR Construction Permit 08-A-294-S2  
567 IAC 23.4(13)

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): See "Plant-Wide Conditions"

Authority for Requirement: DNR Construction Permit 08-A-294-S2

Pollutant: Organic HAPs

Emission Limit(s): 0.16 lb HAP/lb Solid

Authority for Requirement: DNR Construction Permit 08-A-294-S2  
40 CFR Part 63 Subpart PPPP  
567 IAC 23.1(4) "cp"

## **Operational Limits & Reporting/Record keeping Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.*

### **Operating Limits**

- A. The owner or operator shall lay out filter paper over the grill system prior to initiating any surface coating in this paint booth.

### **Reporting and Recordkeeping**

- A. The owner or operator shall keep a log of all materials used in this emission unit and their respective VOC, individual HAP, and total HAP contents.
- B. The owner or operator shall keep a copy of the Material Safety Data Sheet (MSDS) or other product information showing the VOC and HAP contents.
- C. The owner or operator shall record daily the amount of each VOC containing material used at this facility (Plant Number 56-02-053) from all operations, excluding combustion sources and sources meeting a qualifying exemption found in 567 IAC 22.1(2) in applicable units of weight/mass or volume. For the purposes of determining daily usages, the facility may track the amount of each VOC containing material used per blade. Recording the material usage per blade shall be considered equivalent to daily recordkeeping for this operation.
- D. The owner or operator shall calculate and record the total amount of VOC containing materials on a 12-month rolling basis.
- E. The owner or operator shall calculate the VOC emissions from all operations, excluding combustion sources and sources meeting a qualifying exemption found in 567 IAC 22.1(2), in tons for this facility (Plant Number 56-02-053) on a monthly basis and keep a 12-month rolling total. Records for VOC emissions shall be kept on a monthly basis until the VOC emissions exceed 173.0 tons/yr. At this point the owner or operator shall immediately begin keeping a 365-day rolling total amount of VOC emitted at this facility. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned to below 173.0 tons/yr for VOC.
- F. The owner or operator shall submit notifications as required by 40 CFR §63.4510; the owner or operator shall submit required reports in accordance with 40 CFR §63.4520.
- G. The owner or operator shall maintain the necessary records in accordance with 40 CFR §63.4530 and §63.4531.
- H. If using the Compliant Material Option to comply with the HAP limit, the owner or operator shall follow the requirements of 40 CFR §63.4540, §63.4541, and §63.4542.
- I. If using the Emission Rate without Add-on Control Option to comply with the HAP limit, the owner or operator shall follow the requirements of 40 CFR §63.4550, §63.4551, and §63.4552.

Authority for Requirement: DNR Construction Permit 08-A-294-S2  
40 CFR 63 Subpart P  
567 IAC 23.1(4)"cp"

**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)

## **Emission Point ID Number: EP-ML1**

### Associated Equipment

Associated Emission Unit ID Numbers: EU-ML1  
Emissions Control Equipment ID Number: None  
Emissions Control Equipment Description: None  
Continuous Emissions Monitors ID Numbers: None

---

Emission Unit vented through this Emission Point: EU-ML1  
Emission Unit Description: Blade Molding  
Raw Material/Fuel: Paint, Solvent, Adhesive  
Rated Capacity: 3,120 wind turbine blades /year

### **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%<sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 07-A-260-S1  
567 IAC 23.3(2) "d"

<sup>(1)</sup>An exceedance 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 exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 1.0 lb/hr

Authority for Requirement: DNR Construction Permit 07-A-260-S1

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: DNR Construction Permit 07-A-260-S1  
567 IAC 23.3(2) "a"

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): See "Plant-Wide Conditions"

Authority for Requirement: DNR Construction Permit 07-A-260-S1

### **Operational Limits & Reporting/Record keeping Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.*

#### **Reporting and Recordkeeping**

- A. The owner or operator shall keep a log of all materials used in this emission unit and their respective VOC, individual HAP, and total HAP contents.
- B. The owner or operator shall keep a copy of the Material Safety Data Sheet (MSDS) or other product information showing the VOC and HAP contents.
- C. The owner or operator shall record daily the amount of each VOC containing material used at Siemens Gamesa Renewable Energy, Inc. from all operations, excluding combustion sources and sources meeting a qualifying exemption found in 567 IAC 22.1(2) in applicable units of weight/mass or volume. Calculate and record 12-month rolling totals. For the purposes of determining daily usages, the facility may track the amount of each VOC containing material used per blade. Recording the material usage per blade shall be considered equivalent to daily recordkeeping for this operation.
- D. Calculate the VOC emissions from all operations, excluding combustion sources and sources meeting a qualifying exemption found in 567 IAC 22.1(2), in tons for Siemens Gamesa Renewable Energy, Inc. on a monthly basis and keep a 12-month rolling total. Records for VOC emissions shall be kept on a monthly basis until the VOC emissions exceed 173.0 tons/yr. At this point the owner or operator shall immediately begin keeping a 365-day rolling total amount of VOC emitted at Siemens Gamesa Renewable Energy, Inc. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned to below 173.0 tons/yr for VOC.
- E. The permittee, for the purpose of calculating the VOC emissions from the molding process, may assume that 0.01%, by weight, of the VOC in the resin is emitted during the molding process with the rest being retained in the final polymerized product. In addition, a brief description of the rationale for the amount of VOC retained shall be kept with the emission calculations. Assume all of the VOC in the adhesives, catalysts, curing agents, hardeners and similar materials used in the process are emitted at the facility.

Authority for Requirement: DNR Construction Permit 07-A-260-S1

**Emission Point Characteristics**

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

- Stack Height, (ft, from the ground): 27
- Stack Opening, (inches, dia.): 24
- Exhaust Flow Rate (scfm): 4,500
- Exhaust Temperature (°F): Ambient
- Discharge Style: Horizontal
- Authority for Requirement: DNR Construction Permit 07-A-260-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 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)

## **Emission Point ID Number: EP-PB1**

### Associated Equipment

Associated Emission Unit ID Numbers: EU-PB1  
Emissions Control Equipment ID Number: CE-PB1  
Emissions Control Equipment Description: Paint Filters  
Continuous Emissions Monitors ID Numbers: None

---

Emission Unit vented through this Emission Point: EU-PB1  
Emission Unit Description: Paint Booth #1/Cure Oven  
Raw Material/Fuel: Paint & Primer  
Rated Capacity: Roll on or two spray guns each rated at 10.5 gal/hr on primer and  
5.6 gal/hr on topcoat

### **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%<sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 07-A-266-S4  
567 IAC 23.3(2) "d"

<sup>(1)</sup> An exceedance of the indicator opacity of 10% 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<sub>10</sub>)

Emission Limit(s): 3.29 lb/hr

Authority for Requirement: DNR Construction Permit 07-A-266-S4

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.01 gr/dscf, 3.29 lb/hr

Authority for Requirement: DNR Construction Permit 07-A-266-S4  
567 IAC 23.4(13)

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): See "Plant-Wide Conditions"

Authority for Requirement: DNR Construction Permit 07-A-266-S4

Pollutant: Organic HAPs

Emission Limit(s): 0.16 lb HAP/lb Solid

Authority for Requirement: DNR Construction Permit 07-A-266-S4  
40 CFR Part 63 Subpart PPPP  
567 IAC 23.1(4) "cp"

### **Operational Limits & Reporting/Record keeping Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.*

#### **Operating Limits**

- A. The owner or operator shall lay out filter paper over the grill system prior to initiating any surface coating in this paint booth.

#### **Reporting and Recordkeeping**

- A. The owner or operator shall keep a log of all materials used in this emission unit and their respective VOC, individual HAP, and total HAP contents.
- B. The owner or operator shall keep a copy of the Material Safety Data Sheet (MSDS) or other product information showing the VOC and HAP contents.
- C. The owner or operator shall record daily the amount of each VOC containing material used at this facility (Plant Number 56-02-053) from all operations, excluding combustion sources and sources meeting a qualifying exemption found in 567 IAC 22.1(2) in applicable units of weight/mass or volume. For the purposes of determining daily usages, the facility may track the amount of each VOC containing material used per blade. Recording the material usage per blade shall be considered equivalent to daily recordkeeping for this operation.
- D. The owner or operator shall calculate and record the total amount of VOC containing materials on a 12-month rolling basis.
- E. The owner or operator shall calculate the VOC emissions from all operations, excluding combustion sources and sources meeting a qualifying exemption found in 567 IAC 22.1(2), in tons for this facility (Plant Number 56-02-053) on a monthly basis and keep a 12-month rolling total. Records for VOC emissions shall be kept on a monthly basis until the VOC emissions exceed 173.0 tons/yr. At this point the owner or operator shall immediately begin keeping a 365-day rolling total amount of VOC emitted at this facility. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned to below 173.0 tons/yr for VOC.
- F. The owner or operator shall submit notifications as required by 40 CFR §63.4510; the owner or operator shall submit required reports in accordance with 40 CFR §63.4520.
- G. The owner or operator shall maintain the necessary records in accordance with 40 CFR §63.4530 and §63.4531.
- H. If using the Compliant Material Option to comply with the HAP limit, the owner or operator shall follow the requirements of 40 CFR §63.4540, §63.4541, and §63.4542.

- I. If using the Emission Rate without Add-on Control Option to comply with the HAP limit, the owner or operator shall follow the requirements of 40 CFR §63.4550, §63.4551, and §63.4552.

Authority for Requirement: DNR Construction Permit 07-A-266-S4  
40 CFR Part 63 Subpart PPPP  
567 IAC 23.1(4) "cp"

**Emission Point Characteristics**

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

Stack Height, (ft, from the ground): 41.6

Stack Opening, (inches): 86×78

Exhaust Flow Rate (scfm): 52,360

Exhaust Temperature (°F): Ambient

Discharge Style: Vertical, Unobstructed

Authority for Requirement: DNR Construction Permit 07-A-266-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 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

**Paint Booth Agency Operation & Maintenance Plan**

---

Facility:	Siemens Gamesa Renewable Energy, Inc.
EIQ Number	92-6809
Emission Unit:	EU-PB1
Emission Point:	EP-PB1
Control Equipment:	Paint Filters

---

**Weekly**

- Inspect the paint booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.
- Maintain a written record of the observation and any action resulting from the inspection.

**Record Keeping and Reporting**

- Maintenance and inspection records will be kept for five years and available upon request.

**Quality Control**

- The filter equipment will be operated and maintained according to the manufacturer's recommendations.

Authority for Requirement: 567 IAC 24.108(3)

**Emission Point ID Number: See Table Below**

Associated Equipment

Associated Emission Unit ID Numbers: See Table Below

<b>Emission Point</b>	<b>Emission Unit</b>	<b>EU Description</b>	<b>Raw Material / Fuel</b>	<b>Rated Capacity</b>	<b>Control Equipment ID</b>	<b>CE Description</b>
EP-PB2A.1	EU-PB2	Paint Booth #2 / Cure Oven	Paint & Primer	Roll on or two spray guns each rated at 10.5 gal/hr on primer and 5.6 gal/hr on top coat	CE-PB2A.1	Paint Filters
EP-PB2A.2					CE-PB2A.2	
EP-PB2B.1					CE-PB2B.1	
EP-PB2B.2					CE-PB2B.2	

**Applicable Requirements**

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

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

Pollutant: Opacity

Emission Limit(s): 40%<sup>(1)</sup>

Authority for Requirement: DNR Construction Permits: 11-A-256-S2, 11-A-257-S2  
11-A-258-S2, 11-A-259-S2

567 IAC 23.3(2) "d"

<sup>(1)</sup> An exceedance of the indicator opacity of 10% 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<sub>10</sub>)

Emission Limit(s): 0.82 lb/hr

Authority for Requirement: DNR Construction Permits: 11-A-256-S2, 11-A-257-S2  
11-A-258-S2, 11-A-259-S2

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.01 gr/dscf, 0.82 lb/hr

Authority for Requirement: DNR Construction Permits: 11-A-256-S2, 11-A-257-S2  
11-A-258-S2, 11-A-259-S2

567 IAC 23.4(13)

Pollutant: Volatile Organic Compounds (VOC)  
Emission Limit(s): See "Plant-Wide Conditions"

Authority for Requirement: DNR Construction Permits: 11-A-256-S2, 11-A-257-S2  
11-A-258-S2, 11-A-259-S2

Pollutant: Organic HAPs

Emission Limit(s): 0.16 lb HAPs/lb Solid

Authority for Requirement: DNR Construction Permits: 11-A-256-S2, 11-A-257-S2  
11-A-258-S2, 11-A-259-S2

40 CFR Part 63 Subpart PPPP

567 IAC 23.1(4) "cp"

### **Operational Limits & Reporting/Record keeping Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.*

#### **Operating Limits**

- A. The owner or operator shall lay out filter paper over the grill system prior to initiating any surface coating in this paint booth.

#### **Reporting and Recordkeeping**

- A. The owner or operator shall keep a log of all materials used in this emission unit and their respective VOC, individual HAP, and total HAP contents.
- B. The owner or operator shall keep a copy of the Material Safety Data Sheet (MSDS) or other product information showing the VOC and HAP contents.
- C. The owner or operator shall record daily the amount of each VOC containing material used at this facility (Plant Number 56-02-053) from all operations, excluding combustion sources and sources meeting a qualifying exemption found in 567 IAC 22.1(2) in applicable units of weight/mass or volume. For the purposes of determining daily usages, the facility may track the amount of each VOC containing material used per blade. Recording the material usage per blade shall be considered equivalent to daily recordkeeping for this operation.
- D. The owner or operator shall calculate and record the total amount of VOC containing materials on a 12-month rolling basis.
- E. The owner or operator shall calculate the VOC emissions from all operations, excluding combustion sources and sources meeting a qualifying exemption found in 567 IAC 22.1(2), in tons for this facility (Plant Number 56-02-053) on a monthly basis and keep a 12-month rolling total. Records for VOC emissions shall be kept on a monthly basis until the VOC emissions exceed 173.0 tons/yr. At this point the owner or operator shall immediately begin keeping a 365-day rolling total amount of VOC emitted at this facility. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned to below 173.0 tons/yr for VOC.
- F. The owner or operator shall submit notifications as required by 40 CFR §63.4510; the owner or operator shall submit required reports in accordance with 40 CFR §63.4520.
- G. The owner or operator shall maintain the necessary records in accordance with 40 CFR §63.4530 and §63.4531.

- H. If using the Compliant Material Option to comply with the HAP limit, the owner or operator shall follow the requirements of 40 CFR §63.4540, §63.4541, and §63.4542.
- I. If using the Emission Rate without Add-on Control Option to comply with the HAP limit, the owner or operator shall follow the requirements of 40 CFR §63.4550, §63.4551, and §63.4552.

Authority for Requirement: DNR Construction Permits: 11-A-256-S2, 11-A-257-S2  
11-A-258-S2, 11-A-259-S2  
40 CFR Part 63 Subpart PPPP  
567 IAC 23.1(4) "cp"

**Emission Point Characteristics**

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

Stack Height, (ft, from the ground): 41

Stack Opening, (inches, dia): 43

Exhaust Flow Rate (scfm): 10,300

Exhaust Temperature (°F): Ambient

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permits: 11-A-256-S2, 11-A-257-S2  
11-A-258-S2, 11-A-259-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 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)

**Paint Booth Agency Operation & Maintenance Plan**

---

Facility:	Siemens Gamesa Renewable Energy, Inc.
EIQ Number	92-6809
Emission Unit:	EU- PB2
Emission Points:	EP-PB 2A.1, EP-PB2A.2, EP-PB2B.1, EP-PB2B.2
Control Equipment:	Paint Filters

---

**Weekly**

- Inspect the paint booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.
- Maintain a written record of the observation and any action resulting from the inspection.

**Record Keeping and Reporting**

- Maintenance and inspection records will be kept for five years and available upon request.

**Quality Control**

- The filter equipment will be operated and maintained according to the manufacturer's recommendations.

Authority for Requirement: 567 IAC 24.108(3)

**Emission Point ID Number: EP-PK1 & EP-PK2**

Associated Equipment

Associated Emission Unit ID Number: EU-PK1 & EU-PK2

---

Emission Unit vented through this Emission Point: EU-PK1 & EU-PK2  
Emission Unit Description: Paint Kitchens #1 & #2  
Raw Material/Fuel: Paint  
Rated Capacity: N/A

**Applicable Requirements**

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

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

Pollutant: Organic HAPs  
Emission Limit(s): 0.16 lb HAPs/lb Solid  
Authority for Requirement: 40 CFR Part 63 Subpart P  
567 IAC 23.1(4) "cp"

**Operational Limits & Reporting/Record keeping Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.*

**NSPS and NESHAP Applicability**

These units are subject to National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart A – General Provisions and Subpart P for Surface Coating of Plastic Parts and Products. In accordance with 40 CFR §63.4482, the paint kitchens meet the definition of an existing affected source that is used for surface coating of plastic parts and products.

Authority for Requirement: 40 CFR Part 63 Subpart P  
567 IAC 23.1(4) "cp"

**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)

**Emission Point ID Number: EP-RF5, EP-RF6, EP-RF7, and EP-RF8**

Associated Equipment

Associated Emission Unit ID Numbers: EU-RF5  
 Emissions Control Equipment ID Number: None  
 Emissions Control Equipment Description: None  
 Continuous Emissions Monitors ID Numbers: None

Emission Unit Descriptions, Raw Material/Fuel and Rated Capacity are listed in the following table:

EP	EU	Emission Unit Description	Raw Material	Rated Capacity
EP-RF5	EU-RF5	Rough Finishing*	Paint, Solvent, Adhesive	3,120 wind turbine blades/yr
EP-RF6		Rough Finishing*	Paint, Solvent, Adhesive	
EP-RF7		Rough Finishing*	Paint, Solvent, Adhesive	
EP-RF8		Rough Finishing*	Paint, Solvent, Adhesive	

\*Includes rough finishing, repair, and roll-on painting of wind turbine blades

**Applicable Requirements**

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

*The emissions from these emission points shall not exceed the levels specified below.*

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): See "Plant-Wide Conditions"

Authority for Requirement: DNR Construction Permits 08-A-291-S2; 08-A-292-S2  
 08-A-293-S2; 09-A-144-S1

Pollutant: Organic HAPs

Emission Limit(s): 0.16 lb HAP/lb Solid

Authority for Requirement: DNR Construction Permits 08-A-291-S2; 08-A-292-S2  
 08-A-293-S2; 09-A-144-S1

40 CFR Part 63 Subpart PPPP  
 567 IAC 23.1(4) "cp"

## **Operational Limits & Reporting/Record keeping Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.*

### **Reporting and Recordkeeping**

- A. The owner or operator shall keep a log of all materials used in this emission unit and their respective VOC, individual HAP, and total HAP contents.
- B. The owner or operator shall keep a copy of the Material Safety Data Sheet (MSDS) or other product information showing the VOC and HAP contents.
- C. The owner or operator shall keep records of the daily amount of each VOC containing material used at Plant Number 56-02-053 from all operations, excluding combustion sources and sources meeting a qualifying exemption found in 567 IAC 22.1(2) in applicable units of weight/mass or volume. Calculate and record 12-month rolling totals. For the purposes of determining daily usages, the facility may track the amount of each VOC containing material used per blade. Recording the material usage per blade shall be considered equivalent to daily recordkeeping for this operation.
- D. The owner or operator shall calculate the VOC emissions from all operations, excluding combustion sources and sources meeting a qualifying exemption found in 567 IAC 22.1(2), in tons for Plant Number 56-02-053 on a monthly basis and keep a 12-month rolling total. Records for VOC emissions shall be kept on a monthly basis until the VOC emissions exceed 173.0 tons/yr. At this point the owner or operator shall immediately begin keeping a 365-day rolling total amount of VOC emitted at Plant Number 56-02-053. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned to below 173.0 tons/yr for VOC.
- E. The owner or operator shall assume that 100% of the VOC component used in the rough finishing process is emitted. Assume all of the VOC in the adhesives, catalysts, curing agents, hardeners and similar materials used in the process are emitted at the facility.
- F. The owner or operator shall submit notifications as required by 40 CFR §63.4510; the owner or operator shall submit required reports in accordance with 40 CFR §63.4520.
- G. The owner or operator shall maintain the necessary records in accordance with 40 CFR §63.4530 and 40 CFR §63.4531.
- H. If using the Compliant Material Option to comply with the HAP limit, the owner or operator shall follow the requirements of 40 CFR §63.4540, 40 CFR §63.4541, and 40 CFR §63.4542.
- I. If using the Emission Rate Without Add-on Control Option to comply with the HAP limit, the owner or operator shall follow the requirements of 40 CFR §63.4550, 40 CFR §63.4551, and 40 CFR §63.4552.

Authority for Requirement: DNR Construction Permits 08-A-291-S2; 08-A-292-S2  
08-A-293-S2; 09-A-144-S1  
40 CFR Part 63 Subpart PPPP  
567 IAC 23.1(4) "cp"

**Emission Point Characteristics**

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

Stack Height, (ft, from the ground): 36

Stack Opening, (inches): 47.5×47.5

Exhaust Flow Rate (scfm): 32,368

Exhaust Temperature (°F): Ambient

Discharge Style: Vertical, Unobstructed

Authority for Requirement: DNR Construction Permits 08-A-291-S2; 08-A-292-S2  
08-A-293-S2; 09-A-114-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 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)

## **Emission Point ID Number: EP-21 & EP-27**

### Associated Equipment

Associated Emission Unit ID Numbers: EU-21 & EU-27

---

Emission Unit vented through this Emission Point: EU-21  
Emission Unit Description: Primer Blade Curing Oven  
Raw Material/Fuel: Natural Gas  
Rated Capacity: 1.195 MMBtu/hr

Emission Unit vented through this Emission Point: EU-27  
Emission Unit Description: Top-Coat Blade Curing Oven  
Raw Material/Fuel: Natural Gas  
Rated Capacity: 1.195 MMBtu/hr

### **Applicable Requirements**

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

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

Pollutant: Opacity  
Emission Limit(s): 40%  
Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM)  
Emission Limit: 0.8 lb/MMBtu  
Authority for Requirement: 567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)  
Emission Limit(s): 500 ppmv  
Authority for Requirement: 567 IAC 23.3(3)

#### **Operational Limits & Reporting/Record keeping Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.*

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

The process heaters and boilers at this facility are subject to the requirements of 40 CFR, Part 63, Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters".

Authority for Requirement: 40 CFR 63, Subpart DDDDD

**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)

## **Emission Point ID Number: EP-29**

### Associated Equipment

Associated Emission Unit ID Numbers: EU-29  
Emissions Control Equipment ID Number: CE-29A, CE-29B  
Emissions Control Equipment Description: Paint Filters  
Continuous Emissions Monitors ID Numbers: None

---

Emission Unit vented through this Emission Point: EU-29  
Emission Unit Description: Bay 7 Paint Area  
Raw Material/Fuel: Paint, Primer  
Rated Capacity: Roll on and spray gun rated at 9.0 gal/hr combined. 5.0 gal/hr for roll on and 4.5 gal/hr for spray gun

### **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%<sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 20-A-092  
567 IAC 23.3(2) "d"

<sup>(1)</sup> 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: Particulate Matter (PM<sub>10</sub>)

Emission Limit(s): 2.27 lb/hr

Authority for Requirement: DNR Construction Permit 20-A-092

Pollutant: Particulate Matter (PM)

Emission Limit(s): 0.01 gr/dscf

Authority for Requirement: DNR Construction Permit 20-A-092  
567 IAC 23.4(13)

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): See "Plant-Wide Conditions"

Authority for Requirement: DNR Construction Permit 20-A-092

Pollutant: Organic HAPs

Emission Limit(s): 0.16 lb HAP/lb Solid

Authority for Requirement: DNR Construction Permit 20-A-092  
40 CFR Part 63 Subpart PPPP  
567 IAC 23.1(4) "cp"

**Operational Limits & Reporting/Record keeping Requirements**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.*

**Reporting and Recordkeeping**

- A. The owner or operator shall keep a log of all materials used in this emission unit and their respective VOC, individual HAP, and total HAP contents.
- B. The owner or operator shall keep a copy of the Material Safety Data Sheet (MSDS) or other product information showing the VOC and HAP contents.
- C. The owner or operator shall keep records of the daily amount of each VOC containing material used at Plant Number 56-02-053 from all operations, excluding combustion sources and sources meeting a qualifying exemption found in 567 IAC 22.1(2) in applicable units of weight/mass or volume. Calculate and record 12-month rolling totals. For the purposes of determining daily usages, the facility may track the amount of each VOC containing material used per blade. Recording the material usage per blade shall be considered equivalent to daily recordkeeping for this operation.
- D. The owner or operator shall calculate the VOC emissions from all operations, excluding combustion sources and sources meeting a qualifying exemption found in 567 IAC 22.1(2), in tons for Plant Number 56-02-053 on a monthly basis and keep a 12-month rolling total. Records for VOC emissions shall be kept on a monthly basis until the VOC emissions exceed 173.0 tons/yr. At this point the owner or operator shall immediately begin keeping a 365-day rolling total amount of VOC emitted at Plant Number 56-02-053. Calculation requirements will revert back to a monthly basis if the 365-day rolling total is returned to below 173.0 tons/yr for VOC.
- E. The owner or operator shall assume that 100% of the VOC components used in the Bay 7 paint area process is emitted, unless as specified in Condition F below. Assume all of the VOC in the adhesives, catalysts, curing agents, hardeners and similar materials used in the process are emitted at the facility.
- F. If assuming less than 100% VOC emission loss in the Bay 7 paint area emission calculations:
  - a. The owner or operator shall conduct a VOC stack test and use the average VOC control efficiency measured during the test to calculate emissions from EP 29. One-time stack test shall be conducted prior to applying any control efficiency in calculating VOC emissions. Test shall be conducted per specifications in "Monitoring Requirements" below.
  - b. The owner or operator shall monitor the control equipment for VOC concentrations. When VOC concentrations reach 2% of the Lower Explosive Limit (LEL), and the control equipment indicator light changes color, the operator shall change the carbon filters.

- c. The owner or operator shall keep records of date and time the when they change the carbon filter.
- G. The owner or operator shall submit notifications as required by 40 CFR §63.4510; the owner or operator shall submit required reports in accordance with 40 CFR §63.4520.
- H. The owner or operator shall maintain the necessary records in accordance with 40 CFR §63.4530 and 40 CFR §63.4531.
- I. If using the Compliant Material Option to comply with the HAP limit, the owner or operator shall follow the requirements of 40 CFR §63.4540, 40 CFR §63.4541, and 40 CFR §63.4542.
- J. If using the Emission Rate Without Add-on Control Option to comply with the HAP limit, the owner or operator shall follow the requirements of 40 CFR §63.4550, 40 CFR §63.4551, and 40 CFR §63.4552
- K. All process and control equipment for this process shall be operated and maintained according to manufacturer specifications and maintenance schedule.
  - a. The owner or operator shall keep a record of all inspections and maintenance and any actions resulting from the inspections and maintenance for all the control and process equipment for this process.
- L. The owner or operator shall monitor the Pressure Drop weekly. Once the pressure drop reaches 3" H<sub>2</sub>O, the owner or operator shall change the appropriate filter, as recommended by the manufacturer.
  - a. The owner or operator shall keep records of weekly pressure drop values and the pressure drop values when they change the filters.

Authority for Requirement: DNR Construction Permit 20-A-092  
 40 CFR Part 63 Subpart PPPP  
 567 IAC 23.1(4) "cp"

**Emission Point Characteristics**

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

Stack Height, (ft, from the ground): Vented Internally

Stack Opening, (inches): Vented Internally

Exhaust Flow Rate (scfm): 60,000

Exhaust Temperature (°F): Building Ambient

Discharge Style: Vented Internally

Authority for Requirement: DNR Construction Permit 20-A-092

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.*

**Stack Testing:**

Pollutant – VOC

Stack Test to be Completed by (date) – Prior assigning of a VOC control efficiency to this source<sup>(1)</sup>

Test Method – 40 CFR 63, Appendix A Method 320 or  
40 CFR 60, Appendix A Method 18

Authority for Requirement – DNR Construction Permit 20-A-092

<sup>(1)</sup> The facility shall conduct a stack test to demonstrate average VOC control efficiency, when utilizing a control efficiency for filters (CE 29A or CE 29B) to calculate VOC emissions.

**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-30**

### Associated Equipment

Associated Emission Unit ID Numbers: EU-30

---

Emission Unit vented through this Emission Point: EU-30

Emission Unit Description: Green Blade Curing Oven

Raw Material/Fuel: Natural Gas

Rated Capacity: 1.979 MMBtu/hr

### **Applicable Requirements**

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

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

Pollutant: Opacity

Emission Limit(s): 40%

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

Pollutant: Particulate Matter (PM)

Emission Limit: 0.8 lb/MMBtu

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

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

Emission Limit(s): 500 ppmv

Authority for Requirement: 567 IAC 23.3(3)

#### **Operational Limits with Associated Monitoring and Recordkeeping**

*The owner/operator of this equipment shall comply with the operational limits and requirements listed below. Records shall be kept on site for at least five years and shall be available for inspection by the Department.*

### **NSPS and NESHAP Applicability**

The process heaters and boilers at this facility are subject to the requirements of 40 CFR, Part 63, Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters".

Authority for Requirement: 40 CFR 63, Subpart DDDDD

**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

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".

### **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 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 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(3), 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.**

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.

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:

- 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 not required if the permit has a remaining term of less than three years;

b. Reopening and revision on this ground is not 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 not 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;
- 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 2**

2300-15th St., SW  
Mason City, IA 50401  
(641) 424-4073

**Field Office 3**

1900 N. Grand Ave.  
Spencer, IA 51301  
(712) 262-4177

**Field Office 4**

1401 Sunnyside Lane  
Atlantic, IA 50022  
(712) 243-1934

**Field Office 5**

6200 Park Ave  
Suite 200  
Des Moines, IA 50321  
(515) 725-0268

**Field Office 6**

1023 West Madison Street  
Washington, IA 52353-1623  
(319) 653-2135

**Polk County Public Works Dept.**

Air Quality Division  
5885 NE 14th St.  
Des Moines, IA 50313  
(515) 286-3351

**Linn County Public Health**

Air Quality Branch  
1020 6<sup>th</sup> Street SE  
Cedar Rapids, IA 52401  
(319) 892-6000

## V. Appendix A: Links to Standards

40 CFR 63 Subpart A – General Provisions

<https://www.ecfr.gov/cgi-bin/text-idx?SID=016654e87ff23556a362529828a08728&mc=true&node=sp40.11.63.a&rgn=div6>

40 CFR 63 Subpart PPPP – National Emission Standard for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products

<https://www.ecfr.gov/cgi-bin/text-idx?node=sp40.13.63.pppp>

40 CFR 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-DDDDD>

## **VI. Appendix B: Executive Order 10 (EO10) Rules Crosswalk**

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
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 Measurement of Emissions	Kept and combined with rules from Chapters 24, 25, 26, and 29.
22	22	Controlling Pollution-Permits	Controlling Air Pollution - Construction Permitting	Kept construction permit rules and combined with Ch. 20 (definitions) and Ch. 28 (NAAQS). 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 Measurement of Emissions	Moved rules and combined with Ch. 21. Moved TV rules here (to Ch. 24).
25	(New) 21	Emissions Measurement	Compliance, Excess Emissions, and Measurement of Emissions	Moved rules and combined with Ch. 21. Rescinded Ch. 25. (Reserved)
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)
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 Measurement of Emissions	Moved rules and combined with Ch. 21. 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 requirements for major stationary sources—Prevention of significant deterioration (PSD) of air quality	Construction permit requirements for major stationary sources—Prevention of significant deterioration (PSD)	Kept
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)

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
<b>20</b>	<b>20 (Reserved)</b>	<b>Scope of Title - Definitions</b>	<b>N/A</b>	<b>Definitions moved to Ch. 21, 22 and 23.</b> <b>Rescinded Ch. 20. (Reserved)</b>
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	

<b>21</b>	<b>21</b>	<b>Compliance</b>	<b>Compliance, Excess Emissions, and Measurement of Emissions</b>	<b>Kept and combined with rules from Chapters 24, 25, 26, and 29.</b>
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 or is occurring	Evidence used in establishing that a violation has occurred or is occurring	21.5(2) Reserved, some language updated
21.6	21.6	Temporary electricity generation for disaster situations	Temporary electricity generation for disaster situations	Minor language updated
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 equipment	Testing and sampling of new and existing equipment	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	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 - 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 26 Table 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

<b>22</b>	<b>22</b>	<b>Controlling Pollution-Permits</b>	<b>Controlling Air Pollution - Construction Permitting</b>	<b>Kept construction permit rules and combined with Ch. 20 (definitions) and Ch. 28 (NAAQS).</b> <b>Moved operating permit rules to Chapter 24.</b>
22.1	22.1	Permits required for new or existing stationary sources	Definitions and permit requirements for new or existing stationary sources	Added definitions from Ch. 20, some language updated
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 sources located in areas designated attainment or unclassified (PSD)	Major stationary sources located in areas designated attainment 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	

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
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	Permitting requirements for country grain elevators, country grain terminal elevators, grain terminal elevators and feed mill equipment	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 requirements	Applicability of Title V operating permit requirements	Moved from Ch. 22, some language updated to correct punctuation and remove old dates
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	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

22.129	24.129	Information requirements for acid rain permit applications	Information requirements for acid rain permit applications	Moved from Ch. 22, no changes to rule text
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
22.130	24.130	Acid rain permit application shield and binding effect of permit application	Acid rain permit application shield and binding effect of permit application	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
22.131	24.131	Acid rain compliance plan and compliance options—general	Acid rain compliance plan and compliance options—general	Moved from Ch. 22, language updated to adopt 40 CFR 70 rules by reference
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 procedures—completeness	Acid rain permit issuance procedures—completeness	Moved from Ch. 22, no changes to rule text
22.137	24.137	Acid rain permit issuance procedures—statement of basis	Acid rain permit issuance procedures—statement of basis	Moved from Ch. 22, no changes to rule text
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 voluntary operating permits	Reserved	Moved from Ch. 22, no changes to rule text
22.209	24.200 - 24.299	Change of ownership for facilities with voluntary operating permits	Reserved	Moved from Ch. 22, no changes to rule text
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

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 concept”)	Reserved	Removed

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
<b>24</b>	<b>(New) 21</b>	<b>Excess Emissions</b>	<b>Compliance, Excess Emissions, and Measurement of Emissions</b>	<b>Moved rules and combined with Ch. 21.</b> <b>Moved operating permit rules here (to Ch. 24).</b>
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
<b>25</b>	<b>(New) 21</b>	<b>Emissions Measurement</b>	<b>Compliance, Excess Emissions, and Measurement of Emissions</b>	<b>Moved rules and combined with Ch. 21.</b> <b>Rescinded Ch. 25. (Reserved)</b>
25.1	21.10	Testing and sampling of new and existing equipment	Testing and sampling of new and existing equipment	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
<b>26</b>	<b>(New) 21</b>	<b>Emergency Air Pollution Episodes</b>	<b>Compliance, Excess Emissions, and Measurement of Emissions</b>	<b>Moved rules and combined with Ch. 21.</b> <b>Rescinded Ch. 26. (Reserved)</b>
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 26 Table 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
<b>27</b>	<b>27</b>	<b>Local Program Acceptance</b>	<b>Local Program Acceptance</b>	<b>Kept</b>
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
<b>28</b>	<b>22</b>	<b>NAAQS</b>	<b>N/A</b>	<b>Moved rules and combined with Ch. 22.</b> <b>Rescinded Ch. 28. (Reserved)</b>
28.1	22.11	Ambient air quality standards - Statewide standards	Ambient air quality standards	<b>Moved from Ch. 28, minor language updated</b>  Rescinded Ch. 28. (Reserved)
<b>29</b>	<b>(New) 21</b>	<b>Opacity Qualifications</b>	<b>Compliance, Excess Emissions, and Measurement of Emissions</b>	<b>Moved rules and combined with Ch. 21.</b> <b>Rescinded Ch. 29. (Reserved)</b>
29.1	21.13	Methodology and qualified observer	Methodology and qualified observer	Moved from Ch. 29, some language updated

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
<b>30</b>	<b>30</b>	<b>Fees</b>	<b>Fee</b>	<b>Kept</b>
30.1	30.1	Purpose	Purpose	Kept, language updated
30.2	30.2	Fees associated with new source review applications	Fees associated with new source review applications	Kept, some language updated
30.3	30.3	Fees associated with asbestos demolition or renovation notification	Fees associated with asbestos demolition or renovation notification	Kept, some language updated
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 notification of fee rates	Process to establish or adjust fees and notification of fee rates	Kept, some language updated
30.7	30.7	Fee revenue	Reserved	Language removed

<b>31</b>	<b>31</b>	<b>Nonattainment Areas</b>	<b>Nonattainment New Source Review</b>	<b>Kept</b>
31.1	31.1	Permit requirements relating to nonattainment areas	Permit requirements relating to nonattainment areas	Kept, some language updated
31.2	31.2	Conformity of general federal actions to the Iowa state implementation plan or federal implementation plan - Rescinded	Reserved	Language removed
31.3	31.3	Nonattainment new source review requirements for areas designated nonattainment on or after May 18, 1998	Nonattainment new source review (NNSR) requirements for areas designated nonattainment	Kept, some language updated
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 designated before May 18, 1998	N/A	Rescinded and removed

<b>32</b>	<b>N/A</b>	<b>AFO Field Study</b>	<b>N/A</b>	<b>Rescinded Ch. 32. (Reserved)</b>
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 hydrogen sulfide	N/A	Rescinded, reserved, and language removed
32.4	N/A	Exceedance of the health effects standard (HES) for hydrogen sulfide	N/A	Rescinded, reserved, and language removed
32.5	N/A	Iowa Air Sampling Manual	N/A	Rescinded, reserved, and language removed

<b>33</b>	<b>33</b>	<b>Special regulations and construction permit requirements for major stationary sources—Prevention of significant deterioration (PSD) of air quality</b>	<b>Construction permit requirements for major stationary sources—Prevention of significant deterioration (PSD)</b>	<b>Kept</b>
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 major stationary sources in areas designated attainment or unclassified (PSD)	PSD construction permit requirements for major stationary sources	Kept, some language updated
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	33.10	Exceptions to adoption by reference	Exceptions to adoption by reference	Kept, some language updated

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
<b>34</b>	<b>N/A</b>	<b>Emissions Trading-CAIR-CAMR</b>	<b>N/A</b>	<b>Rescinded Ch. 34. (Reserved)</b>
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 requirements for the Clean Air Interstate Rule (CAIR) - rescinded	N/A	Rescinded, reserved, and language removed
34.201	N/A	CAIR NOx annual trading program general provisions - rescinded	N/A	Rescinded, reserved, and language removed
34.202	N/A	CAIR designated representative for CAIR NOx sources - rescinded	N/A	Rescinded, reserved, and language removed
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 provisions - rescinded	N/A	Rescinded, reserved, and language removed
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 - rescinded	N/A	Rescinded, reserved, and language removed
34.226	N/A	CAIR NOx ozone season allowance tracking system - rescinded	N/A	Rescinded, reserved, and language removed
34.227	N/A	CAIR NOx ozone season allowance transfers - rescinded	N/A	Rescinded, reserved, and language removed
34.228	N/A	CAIR NOx ozone season monitoring and reporting - rescinded	N/A	Rescinded, reserved, and language removed
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 requirements for the Clean Air Mercury Rule (CAMR) - rescinded	N/A	Rescinded, reserved, and language removed
34.301	N/A	Mercury (Hg) budget trading program general provisions - rescinded	N/A	Rescinded, reserved, and language removed
34.302	N/A	Hg designated representative for Hg budget sources - rescinded	N/A	Rescinded, reserved, and language removed
34.303	N/A	General Hg budget trading program permit requirements - rescinded	N/A	Rescinded, reserved, and language removed
34.304	N/A	Hg allowance allocations - rescinded	N/A	Rescinded, reserved, and language removed
34.305	N/A	Hg allowance tracking system - rescinded	N/A	Rescinded, reserved, and language removed

AQB Rule Tracking Crosswalk

34.306	N/A	Hg allowance transfers - rescinded	N/A	Rescinded, reserved, and language removed
<b>Previous Chapter Number (Prior to 5/15/2024)</b>	<b>Current Chapter Number</b>	<b>Previous Title and Description (Prior to 5/15/2024)</b>	<b>Current Title and Description</b>	<b>Actions Taken</b>
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

<b>35</b>	<b>N/A</b>	<b>Grant Assistance Programs</b>	<b>N/A</b>	<b>Rescinded Ch. 35. (Reserved)</b>
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

# 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:

<b>Pollutant</b>	<b>Abbreviation</b>	<b>Potential Emissions (Tons per Year)</b>
Particulate Matter ( $\leq 2.5 \mu\text{m}$ )	PM <sub>2.5</sub>	6.01
Particulate Matter ( $\leq 10 \mu\text{m}$ )	PM <sub>10</sub>	8.02
Particulate Matter	PM	9.49
Sulfur Dioxide	SO <sub>2</sub>	0.01
Nitrogen Oxides	NO <sub>x</sub>	1.88
Volatile Organic Compounds	VOC	230.10
Carbon Monoxide	CO	1.58
Lead	Lead	0.00
Hazardous Air Pollutants <sup>(1)</sup>	HAP	147.12

<sup>(1)</sup> 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.

Zane Peters  
Iowa Department of Natural Resources - Air Quality Bureau  
6200 Park Ave  
Ste #200  
Des Moines, Iowa 50321  
Phone: (515) 808-0458  
E-mail: [zane.peters@dnr.iowa.gov](mailto:zane.peters@dnr.iowa.gov)

---

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:	<b>Siemens Gamesa Renewable Energy Inc.</b>
SIC Code:	<b>3511 (Turbine Generator Blades)</b>
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

<b>Pollutant</b>	<b>Major for Title V?</b>
PM <sub>10</sub>	<input type="checkbox"/>
SO <sub>2</sub>	<input type="checkbox"/>
NO <sub>x</sub>	<input type="checkbox"/>
VOC	<input checked="" type="checkbox"/>
CO	<input type="checkbox"/>
Lead	<input type="checkbox"/>
Individual HAP	<input checked="" type="checkbox"/>
Total HAPs	<input checked="" type="checkbox"/>

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 WWW
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.1 through 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."