

## **Air Permitting Requirements for Group 1 Grain Elevators**

### **Disclaimer**

This document, entitled "Air Permitting Requirements for Group 1 Grain Elevators," is intended to serve as guidance only, and is not to be construed as taking the place of any statute, rule or other applicable law or any policy of the Department. This document was compiled on December 11, 2007, and may not reflect changes in statutes, rules or other law that occur after this date. In the event that any information contained in this document conflicts with any enacted statute, rule or other applicable law, the statute, rule or other applicable law controls. The purpose of this document is to simplify the permitting process for parties unfamiliar with the Department's rules. Please contact the Department for the most recent applicable rules.

**Applicability:** Existing and new country grain elevators, country grain terminal elevators or grain terminal elevators are considered to be Group 1 grain elevators if they have a facility-wide potential to emit (PTE) of PM-10 that is less than 15 tons per year. PTE is calculated using the PTE Calculation Tool provided by the Iowa DNR. An existing facility is one that construction or reconstruction commenced on before February 6, 2008. A new facility is one that construction or reconstruction commenced on or after February 6, 2008.

**Submittal Requirements and Processing:** A "Registration for Group 1 Grain Elevators" must be submitted to the Iowa DNR. This registration may be completed and printed out from the PTE Calculation Tool. PTE calculations must be included with the registration when it is submitted. Owners or operators of existing facilities may submit the registration to the Iowa DNR anytime on or after December 4, 2007 and on or before March 31, 2008. Registrations and PTE calculations should be mailed to Iowa DNR, Air Quality Bureau, 7900 Hickman Rd, Suite 1, Urbandale, Iowa 50322. The owner or operator of a new facility must submit a registration to the Iowa DNR prior to initiating construction or reconstruction of a facility.

The registration will become effective upon the later of either March 19, 2008 or the Iowa DNR's receipt of the signed registration form and the PTE calculations. At that time, the Grain Elevator Amnesty will no longer apply. The Iowa DNR will notify you in writing by mail of receipt of your registration within 2 weeks of receipt. If you do not receive written notification within this time period please contact (515) 242-5100.

**Registration Update Requirements:** Emissions units may be added, removed and modified, or the throughput or operations changed at the facility without modifying the registration. However, the PTE for PM<sub>10</sub> must be recalculated using the PTE Calculation Tool prior to making any additions to, removals of or modifications to equipment, and only if the facility continues to meet the emission limits and operating limits (including restrictions on material throughput and hours of operation, if applicable, as specified in the PTE for PM<sub>10</sub> calculations) that were specified in the registration. Changes at a facility that would result in a change in the emission limits and operating limits specified in the PTE calculations included with the previously submitted registration would have to be documented by the submittal of a new registration to the Iowa DNR with supporting PTE calculations. The new registration must be submitted prior to making the changes that trigger the need to submit a new registration.

Status of Existing Air Permits: The registration exempts owners and operators from the requirement to obtain air construction permits for air pollution emitting equipment. For equipment that currently has an air construction permit, that permit shall remain in full force and effect, and the permit shall not be invalidated by the subsequent submittal of a registration form.

Enforceable Emission Limits: For country grain terminal elevators and grain terminal elevators, the operating limits, including grain throughput limits, specified in the PTE calculations that are submitted with the registration are enforceable limits.

Best management practices (BMP) Requirements: Best management practices (BMP) for controlling air pollution at the facility and for limiting fugitive dust at the facility from crossing the property line must be implemented. BMP are included in the “Best Management Practices (BMP) for Grain Elevators” document. This document is available from the Iowa DNR upon request and is also included in the PTE Calculation Tool. Applicable BMP must be implemented at an existing facility no later than March 31, 2009. At a new facility, the applicable BMP must be fully implemented upon equipment start-up.

Record keeping Requirements: Records of the previous five calendar years of total annual grain handled must be retained on site. The facility’s potential PM<sub>10</sub> emissions must also be calculated annually by January 31 for the previous calendar year. These records and calculations do not need to be submitted to the Iowa DNR but must be kept on site for a period of five years and be made available upon request by the Iowa DNR.

Future Emissions Increases: Emissions increases must be calculated using the PTE Calculation Tool prior to making any additions, removals or modifications to equipment. The applicable requirements for Group 2, Group 3 or Group 4 facilities must be met if the PM<sub>10</sub> emissions from the facility will increase to 15 or more tons per year, and the requirements must be met prior to making any additions to, removals of or modifications to equipment.

Changes to facility classification or permanent grain storage capacity: If the facility’s operations are changed or the facility’s permanent grain storage capacity is increased to more than 2.5 million U.S. bushels, the facility’s classification and the allowed method for calculating PTE must be reevaluated to determine if any increases to the PTE for PM<sub>10</sub> will occur, prior to making the change. If the proposed change will alter the facility’s classification or will increase the facility’s PTE for PM<sub>10</sub> such that the facility PTE increases to 15 or more tons per year, the permitting requirements for Group 2, Group 3 or Group 4 facilities, as applicable, must be complied with prior to making the change.