

Air Permitting Requirements for Group 2 Grain Elevators

Disclaimer

This document, entitled "Air Permitting Requirements for Group 2 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 November 13, 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 2 grain elevators if they have a facility-wide potential to emit (PTE) of PM-10 that is greater than or equal to 15 tons of PM₁₀ per year and is less than or equal to 50 tons of PM₁₀ 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 Group 2 Grain Elevator permit application may be submitted to the Iowa DNR. The Group 2 Grain Elevator permit application may be completed and printed out from the PTE Calculation Tool. PTE calculations must be included with the Group 2 Grain Elevator permit application when it is submitted. Alternatively, an air construction permit application may be submitted for each piece of air pollutant emitting equipment located at the facility.

Owners or operators of existing facilities are required to submit a completed Group 2 Grain Elevator permit application or the appropriate construction permit applications to the Iowa DNR anytime on or after December 4, 2007 and on or before March 31, 2008. Submittals 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 completed Group 2 Grain Elevator permit application or the appropriate construction permit applications to the Iowa DNR prior to initiating construction or reconstruction of a facility.

The Group 2 Grain Elevator permit application or the construction permit applications will be processed and a permit(s) will be issued and mailed to the facility owner or operator. Upon issuance, the Grain Elevator Amnesty will no longer apply.

Group 2 Grain Elevator Permit Update Requirements: Emissions units may be added, removed and modified, or the throughput or operations changed at the facility without modifying the Group 2 Grain Elevator permit. However, the PTE for PM₁₀ 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 PM₁₀ calculations) that are specified in the Group 2 Grain Elevator permit. Changes at a facility that would result in a change

in the emission limits and operating limits specified in the Group 2 Grain Elevator permit PTE calculations included with the previously submitted Group 2 permit application would have to be documented by the submittal of a new Group 2 Grain Elevator permit application to the Iowa DNR with supporting PTE calculations. The new Group 2 Grain Elevator permit application must be submitted prior to making the changes that trigger the need to submit a new Group 2 Grain Elevator permit application.

Status of Existing Air Permits: 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 Group 2 Grain Elevator permit application. However, the owner or operator may request that the Iowa DNR incorporate any equipment with a previously issued air construction permit into the Group 2 Grain Elevator permit. The Iowa DNR will grant such requests on a case-by-case basis and if the request is granted the owner or operator is responsible for requesting that the previously issued air construction permits be rescinded.

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 as specified in the Group 2 Grain Elevator permit. The 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.

Emission Inventory Submittals: An emissions inventory of all regulated air pollutants emitted from the facility will be required to be submitted to the Iowa DNR once every three years. The inventory will be submitted when requested and on forms provided 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 3 or Group 4 facilities must be met if the PM₁₀ emissions from the facility will increase to more than 50 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 PM₁₀ 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 PM₁₀ such that the facility PTE increases to more than 50 tons per year, the permitting requirements for Group 3 or Group 4 facilities, as applicable, must be complied with prior to making the change.